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26 UNITED STATES DISTRICT COURT
27 CENTRAL DISTRICT OF CALIFORNIA

28 IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 8:10ML2151 JVS (FMOx)
OPERATIVE THIRD AMENDED
ECONOMIC LOSS MASTER
CONSOLIDATED COMPLAINT

This Document Relates To:
ALL ECONOMIC LOSS ACTIONS

JURY TRIAL DEMANDED

OPERATIVE THIRD AMENDED ECONOMIC LOSS
MASTER CONSOLIDATED COMPLAINT

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1 Pursuant to Scheduling Order No. 3, and the Court’s Order Granting in Part
2 and Denying in Part Defendants’ Motion to Dismiss, filed on May 4, 2012, Plaintiffs
3 in the “Economic Loss” cases file this Amended Economic Loss Master
4 Consolidated Complaint.
5

6 I. INTRODUCTION

7 1. Since 2001, Toyota Motor Corporation (“TMC”) and its United States
8 sales and marketing arm Toyota Motor Sales, U.S.A., Inc. (“TMS”) (together,
9 “Toyota” or “Defendants”) have sold tens of millions of vehicles (under the Toyota,
10 Lexus, and Scion brand names) throughout the United States and worldwide that use
11 an electronic throttle control system (“ETCS” or “ETCS-i”).
12

13 2. ETCS vehicles operate with an electronic throttle control system that
14 severs the mechanical link between the accelerator pedal and the engine. In place of
15 the cable that connects the two components, complex computer and sensor systems
16 communicate an accelerator pedal’s position to the engine throttle, telling the vehicle
17 how fast it should go. Toyota began installing these electronic control systems in
18 some Lexus models in 1998, in Camry and Prius models in 2001 and 2002, and in all
19 Toyota-made vehicles by 2006.¹ Toyota promised that these new systems would
20 operate safely and reliably. This promise turned out to be false in several material
21 respects. In reality, Toyota concealed and did not fix a serious quality and safety
22 problem plaguing all ETCS cars – the vehicles had a propensity to runaway or
23 accelerate contrary to the driver’s intent that was greater in vehicles without ETCS.
24
25
26
27

28 ¹ See U.S. Bound Vehicle Models and MY with ETCS-i, at TOYEC-0000577.

1 3. In press releases, sales literature, brochures and other consumer-oriented
2 documents, Toyota has consistently promoted “quality,” “safety” and “reliability” as
3 top priorities in all of its vehicles and has specifically promoted ETCS. Toyota
4 promised that a “fundamental component of building safe cars” was testing and
5 analyzing why accidents occur. In fact, despite being on notice of an increased trend
6 in UA related accidents, Toyota did not meaningfully investigate why these UA
7 accidents were occurring.
8

9 4. From 2002 to the present Toyota received reports of crashes and injuries
10 that put Toyota on notice of the serious safety issues presented by sudden unintended
11 acceleration (“SUA” or “UA”). Two of the top five categories of injury claims in
12 NHTSA’s Early Warning Reporting Database involved “speed control” issues on the
13 2007 Lexus ES 350 and Toyota Camry. As one internal document observed, the
14 issues presented by a SUA-related defect are “catastrophic.”² Despite the
15 catastrophic nature of this defect, Toyota has concealed its existence and has failed
16 to repair the problem.
17

18 5. Complaint data lodged with NHTSA reveals a SUA defect in vehicles
19 with ETCS. Within the first year of changing from non-ETCS to ETCS, for most
20 Toyota and Lexus models there was a material increase in SUA events such that
21 Toyota knew or recklessly disregarded safety-related defect:
22

23 Lexus RX	1.8-fold increase
24 4Runner	6-fold increase
25 Avalon	2-fold increase

26

27
28 ² TOY-MDLID00003908.

1	Camry	3.7-fold increase
2	Highlander	2.8-fold increase
3	RAV4	2-fold increase
4	Sienna	2-fold increase
5	Tacoma	14-fold increase
6	Lexus ES	5-fold increase

7
8 6. This trend is greater once the complaints known only to Toyota are
9 analyzed. Toyota has received at least 89,000 complaints, and possibly as many as
10 100,000 or more, involving SUA incidents. The reported number of UA incidents
11 ranges between 47,992 and 173,232. This is a conservative number and does not
12 reflect the known factor of underreporting of adverse events. It is well-recognized in
13 academic studies that the actual number of adverse events exceeds those that are self-
14 reported. The concept of underreporting of adverse events indicates that the actual
15 number of UA events might be far greater than the number reported to NHTSA and
16 Toyota, and is estimated to be as high as 380,000 UA events since ETCS was
17 introduced in Toyota vehicles.
18
19

20 7. As a result of this statistically significant increase in UA, irrespective of
21 whether these SUA events are caused by floor mats, pedals, failures in the ETCS, or a
22 failure in other aspects of the electrical and mechanical systems, all Toyota vehicles
23 with ETCS are defective and are not the safe vehicles plaintiffs bargained for.

24 8. This defect renders the vehicles unsafe and are not what a reasonable
25 consumer expected to be purchasing. For example, from 2003-2009, there were 23
26 claims of death or injury involving speed control on the 2005 Camry, 20 on the 2007
27 Camry, and 18 on the 2007 Lexus ES.
28

1 9. Despite notice of the SUA defect in ETCS vehicles, Toyota did not
2 disclose to consumers that its vehicles – which Toyota for years had advertised as
3 “safe” and “reliable” – were in fact not as safe or reliable as a reasonable consumer
4 expected due to the heightened risk of unintended acceleration. Consumers did not
5 know that Toyota ETCS vehicles were more prone to UA than any other
6 manufacturer’s vehicles. Toyota never disclosed that it had no credible or scientific
7 explanation for SUA events in ETCS vehicles. Rather than disclose the truth, Toyota
8 concealed the existence of this defect. Toyota’s strategy was to “stop this from
9 moving forward” – referring to the possibility of a public hearing before the United
10 States Congress on SUA years before the congressional hearings in 2010.³
11

12 10. By late 2009 and early 2010, as NHTSA and Toyota received more and
13 more reports of SUA, Toyota finally admitted there might be “mechanical
14 problems.” After years of consistently blaming such events on driver error and
15 emphatically denying the existence of any defect, Toyota claimed that some SUA
16 events could be explained by the entrapment of the accelerator pedal by the floor
17 mats, or by so-called “sticky pedals.” Toyota recalled certain vehicles to address
18 these potential problems and publicly proclaimed that these recalls resolved all
19 concerns of SUA in Toyota vehicles. But SUA events kept occurring, even in
20 vehicles that did not have floor mats and vehicles that were not subject to the sticky
21 pedal recall. In 2010 there were 14,000 UA customer complaints investigated by
22 Toyota, most of these vehicles had supposedly been “fixed” by the sticky pedal and
23 floor mat recalls. For 99% of these UA complaints Toyota concluded “NTF,” *i.e.*, no
24
25
26

27 ³ TOY-MDLID00050747.
28

1 trouble found and has wrongfully blamed the incidents on driver error, and thus has
2 not fixed the cause of the UA in these vehicles.

3 11. In response to a Congressional Committee's January 28, 2010 request
4 for internal Toyota documents involving SUA complaints, Toyota provided a
5 representative sample of reports describing calls received through the company's
6 telephone complaint line. To produce this sample, Toyota first identified 37,900
7 customer contact reports in its database as potentially related to SUA. Toyota then
8 randomly selected 3,430 of those complaints for review. Toyota ultimately
9 determined that 1,008 of those complaints were directly related to SUA and provided
10 these 1,008 reports to the Committee.
11

12 12. In responding to Congress, Toyota unilaterally excluded calls after
13 October 1, 2009, calls that it claimed did not involve SUA incidents, and calls
14 involving vehicles produced before 2001. Toyota then acknowledged 233 reports of
15 SUA from the random sample of 3,430 complaints Toyota produced to the
16 Committee. Of these 233 complaints, Toyota claimed 69 involved vehicle crashes.
17

18 13. These 233 incidents occurred in a broad variety of Toyota vehicles and
19 were reported in vehicles produced in every model year from 2001 through 2010.⁴
20 Assuming the 3,430 complaints selected by Toyota for review were in fact a random
21 sample of the 37,900 complaints in the Toyota database, Toyota would have received
22 an estimated 2,600 complaints of sudden unintended acceleration from Toyota and
23
24

25 ⁴ Twenty-nine percent of the complaints involved Camry models, 13% involved
26 Lexus models, 10% involved Corollas, and 9% involved Tacoma models. Model
27 year 2007 vehicles were the subject of 17% of all sudden unintended acceleration
28 complaints, and model year 2002 and 2004 vehicles were each the subject of 13% of
these complaints.

1 Lexus drivers between January 2000 and October 2009. These complaints would
2 have included an estimated 760 crashes.

3 14. In the data the Committee reviewed, operators on the Toyota customer
4 complaint line (who relied on customer reports and information from dealer
5 inspections) identified floor mats or pedals as the cause of only 16% of the SUA
6 incident reports. Approximately 70% of the SUA events in Toyota's own customer
7 call database involved vehicles that are not subject to the 2009 and 2010 floor mat
8 and "sticky pedal" recalls.
9

10 15. Analyses of publicly available databases by other researchers indicate
11 that from 1999 to the present there were more than 5,800 SUA reported incidents
12 involving Toyotas that resulted in 2,166 crashes, 1,011 injuries and 78 deaths.
13 Internally, Toyota was tallying the deaths caused by SUA. As noted, since many
14 drivers do not report a UA incident, the actual number of UA incidents is much
15 higher.
16

17 16. Despite years of warnings that its vehicles had an unacceptable number
18 of UA events after the introduction of ETCS and in comparison to other
19 manufacturers, Toyota has still failed to properly disclose, explain or fix the
20 underlying problem with ETCS. This leaves millions of Toyota owners with
21 vehicles that potentially could race out of control.
22

23 17. SUA is preventable. For example, "brake-override" systems ("BOS")
24 designed to recognize an attempt by the driver to brake while at the same time
25 requesting an open throttle have been employed in vehicles sold in the United States
26 by other manufacturers for years. As admitted by TMS President James Lentz in his
27 deposition, the tragic Saylor accident would not have happened if the vehicle had a
28

1 BOS. Toyota, however, failed to incorporate a brake-override or other appropriate
2 fail-safe mechanism. Indeed, until late 2009, no Toyota vehicle had a “brake-
3 override” system or other adequate fail-safe mechanical system that was sufficient to
4 prevent SUA. Only after extensive publicity concerning the SUA defect in Toyota
5 vehicles and after the Plaintiffs in this litigation alleged a lack of BOS did Toyota
6 add a brake-override as standard equipment in 2011 model-year vehicles. In
7 response Toyota first addressed BOS by announcing it would provide brake-
8 overrides to the following models: 2005-2010 Tacoma, 2009-2010 Venza, 2008-
9 2010 Sequoia, 2007-2010 Camry, 2005-2010 Avalon, 2007-2010 Lexus ES 350,
10 2006-2010 IS 350 and 2006-2010 IS 250. But this announcement is not an effective
11 remedy or repair. First, it was announced not as a safety recall but as a “confidence
12 booster.” Most consumers did not and will not take their vehicles in for a brake-
13 override remedy described misleadingly as a “confidence” measure. Second, the
14 “confidence booster” does not cover all vehicles with the SUA defect. Toyota did
15 not offer BOS in a wider range of vehicles because the memory limitations in these
16 vehicles would have required a new ECM – and Toyota did not want to spend the
17 money to do so – even though a BOS can save lives when a pedal is trapped. Third,
18 the brake-override system being offered is not as robust or effective as an override as
19 implemented by other manufacturers, or as robust as the BOS in 2012 models.
20 Fourth, whatever is causing 14,000 UA complaints in just 2010, has not been
21 addressed by Toyota either by way of a design change or change in the ETCS.
22
23
24
25

26 18. Many of the major automobile manufacturers have had a brake-override
27 or smart pedal for years. Not so for Toyota. Toyota recognized the need for a brake-
28 override” as early as 2007, if not before: when discussing the “floor mat issue,” it

1 was suggested that “a fail safe option similar to that used by other companies to
2 prevent unintended acceleration” should be investigated. The fail-safe referred to,
3 used by both GM and Audi at the time, was a brake-override. Belatedly, in 2009
4 Toyota engineers again addressed this issue after the well-publicized death of a
5 police officer due to unintended acceleration.
6

7 During the floor mat sticking issue of 2007, TMS
8 suggested that there should be “a fail safe option similar to
9 that used by other companies to prevent unintended
10 acceleration.” I remember being told by the accelerator
11 pedal section Project General Manager at the time (Mr. M)
12 that “This kind of system will be investigated by Toyota,
13 not by Body Engineering Div.” Also, that information
14 concerning the sequential inclusion of a fail safe system
15 would be given by Toyota to NHTSA when Toyota was
16 invited in 2008. (The NHTSA knows that Audi has
17 adopted a system that closes the throttle when the brakes
18 are applied and that GM will also introduce such a
19 system.)⁵
20
21

22 19. Toyota admits that the recalls have not addressed the problem. James
23 Lentz, Toyota’s second-highest ranking North American executive was asked: “Do
24 you [] believe that the recall on the carpet changes and the recall on the sticky pedal
25 will solve the problem of sudden unintended acceleration?” His reply: “Not totally.”
26

27 _____
28 ⁵ TOY-MDLID00041130T-0001.

1 20. In prepared testimony before the Committee on Oversight and
2 Government Reform of the U.S. House of Representatives on February 24, 2010,
3 TMC President and Chief Executive Officer Akio Toyoda admitted that Toyota's
4 growth in recent years was "too quick" and the company's priorities of "first, safety;
5 second, quality; third, volume" had become "confused." Mr. Toyoda went on to
6 apologize to American consumers: "I regret that this has resulted in the safety issues
7 described in the recalls we face today, and I am deeply sorry for any accidents that
8 Toyota drivers have experienced."

9
10 21. Yoshimi Inaba, President and Chief Executive Officer of Toyota Motor
11 North America, Inc., likewise acknowledged that Toyota had failed its customers.
12 Mr. Inaba testified in the United States Senate Sub-Committee hearings on Toyota
13 recalls:
14

15 In recent months we have not lived up to the high standard
16 our customers and the public have come to expect from
17 Toyota, despite our good faith efforts. As our president,
18 Akio Toyoda, told members of Congress last week, we
19 sincerely regret that our shortcomings have resulted in the
20 issues associated with our recent recalls.
21

22 22. Shinichi Sasaki, TMC's Executive Vice President admitted before
23 Congress that Toyota "did not listen to its customers":

24 How this issue came about is because there were many
25 vehicle – excuse me – many voices were sent to us from
26 the customers, but we really did not listen to every one of
27 them very carefully, one by one. We should have really
28

1 listened to them carefully and rendered some technical
2 analysis so that it would be connected to our following
3 product improvement. However, the quality of this work
4 or the efficiency of our work or speed with which we
5 worked had become sluggish, or sort [sic] failed gradually,
6 and this has come to a much larger issue.
7

8 23. In testifying to Congress, Toyota made no mention of instances where
9 its own “reliable” employees replicated SUA events not caused by pedals or mats. In
10 one instance, a “reliable” service manager had the vehicle accelerate to 95 mph in
11 “five to 10 seconds.” When these SUA events were replicated by Toyota
12 technicians; Toyota repurchased the vehicles and if possible made the vehicle owner
13 sign a confidentiality agreement.
14

15 24. Rather than disclose these confirmed SUA events Toyota concealed the
16 defect. Additionally, these confirmed SUA events revealed another aspect of the
17 defect – the failure of the vehicle’s diagnostic tools to capture the malfunction. In
18 other words, no diagnostic trouble code (“DTC”) or fault code was triggered during
19 many of these SUA events.
20

21 25. As the long-concealed SUA defect finally began to see the light of day
22 and the public realized that Toyota had no fail-safe mechanisms to prevent SUA, the
23 value of Toyota cars diminished. Many consumers sought to return their cars out of
24 fear that SUA could occur and cause catastrophic injury or death. One class member
25 and SUA victim wrote: “I drive a 4 year old and 3 year old child around and am
26 extremely thankful they were not in the car.... Had this happened on the freeway,
27 we would have all been dead.” Her request for the “original purchase price of the car
28

1 refunded” was rejected.⁶ Her concerns and request for revocation of her purchase is
2 not an isolated incident. Toyota has refused to take class members’ vehicles back,
3 and has refused to and cannot provide an adequate repair.

4 26. Plaintiffs seek class action status pursuant to Fed. R. Civ. P. 23(b)(2)
5 and (b)(3) on behalf of nationwide Consumer and Commercial Classes of Toyota
6 vehicle owners/lessors of all vehicles with ETCS.⁷

7
8 27. Toyota does substantial business in California, the principal offices of
9 Toyota Motor Sales, U.S.A., Inc. (“TMS”) are in California, and much of the
10 conduct that forms the basis of the complaint emanated from Toyota’s headquarters
11 in Torrance, California. California has a larger percentage of class members than
12 any other state.
13

14 II. JURISDICTION AND VENUE

15 28. This Court has subject matter jurisdiction pursuant to the Class Action
16 Fairness Act of 2005, 28 U.S.C. § 1332(d), because at least one class member is of
17 diverse citizenship from one Defendant, there are more than 100 class members; and
18 the aggregate amount in controversy exceeds \$5,000,000 and minimal diversity
19 exists.
20

21 29. Venue is proper in this District under 28 U.S.C. § 1391(a) because a
22 substantial part of the events or omissions giving rise to the claims occurred and/or
23 emanated from this District, and Defendants have caused harm to class members
24 residing in this District.
25

26 ⁶ TOY-MDLID90011054.

27 ⁷ The class definition in this paragraph is asserted to preserve on appeal Plaintiffs’
28 position on choice of law.

III. PARTIES⁸

A. Consumer Plaintiffs from the Bellwether States

1. California

30. Plaintiff Kathleen Atwater is a resident and citizen of California. She owned a 2009 Toyota RAV4 Sport. After learning about the risk of SUA, Ms. Atwater called Toyota's Customer Experience Center and was assigned claim number 1001133126. Ms. Atwater's RAV4 was included in the "sticky pedal" recall. Pursuant to the recall, Ms. Atwater's local Toyota dealership installed an accelerator reinforcement bar. At that time, she asked a Toyota service advisor if the installation of the accelerator reinforcement bar would eliminate the risk of SUA. The service advisor responded that "to be honest" he did not believe the "shim" would suffice because he thought the problem was probably electronic. Ms. Atwater asked both her dealership and Toyota to take back the RAV4; neither would do so. On February 13, 2010, Ms. Atwater traded in her 2009 RAV4 for a 2010 Ford Fusion. Ms. Atwater received less for the sale of her RAV4 than she would have received if the vehicle did not have a SUA defect. She saw advertisements for Toyota vehicles on television, in magazines, on billboards, in brochures at the dealership, and on the Internet for several years before she purchased her Toyota RAV4 Sport on April 5, 2009. Although she does not recall the specifics of the many Toyota advertisements she saw before she purchased her RAV4 Sport, she does recall that safety and reliability were consistent themes across the

⁸ As noted above, all allegations of the SAMCC as well as the Danzinger and Gudmundson complaints are incorporated by reference for the purposes of appeal. In the TAMCC only those claims of Plaintiffs not dismissed are asserted in the document itself.

1 advertisements she saw. Those representations about safety and reliability
2 influenced her decision to purchase her RAV4 Sport. She also reviewed the window
3 sticker affixed to the window of her RAV4 Sport. Had those advertisements,
4 window sticker, or any other materials disclosed that Toyota vehicles could
5 accelerate suddenly and dangerously out of the driver's control and lacked a fail-safe
6 mechanism to overcome this, she would not have purchased her RAV4 Sport, or
7 would have paid less than she did.
8

9 31. Plaintiff Dale Baldisseri is a resident and citizen of California. He owns
10 a 2009 Toyota Camry. In November 2009, Mr. Baldisseri received a notice from
11 Toyota that described UA. Mr. Baldisseri was concerned, based on the notice, about
12 UA, and eventually rented a car rather than continuing to drive his Camry.
13 Mr. Baldisseri called Toyota's Customer Experience Center and asked that Toyota
14 supply him with a substitute car, but Toyota refused. Mr. Baldisseri and his wife are
15 afraid to drive the Camry because of its SUA defect, so the vehicle has remained
16 parked since December 2009. He saw advertisements for Toyota vehicles on
17 television, in magazines, on billboards, in brochures at the dealership, and on the
18 Internet during the five to ten years before he purchased his Toyota Camry on
19 September 1, 2008. Although he does not recall the specifics of the many Toyota
20 advertisements he saw before he purchased his Camry, he does recall that safety and
21 reliability were a very frequent theme across the advertisements he saw. Those
22 advertisements about safety and reliability influenced his decision to purchase his
23 Camry. Had those advertisements or any other materials disclosed that Toyota
24 vehicles could accelerate suddenly and dangerously out of the driver's control, and
25 lacked a fail-safe mechanism to overcome this, he would not have purchased his
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1 Camry. He certainly would not have paid as much for it, but regardless of that, he
2 wouldn't have purchased it.

3 32. Plaintiff Karina Brazdys is a resident and citizen of California. She
4 owns a 2009 Toyota Highlander. In April 2010, Ms. Brazdys experienced a SUA
5 incident. While driving to work, Ms. Brazdys was going approximately 65 mph on
6 the highway when her car suddenly accelerated to 85 mph. Ms. Brazdys was able to
7 slow the car by applying the brake. During the 18 months leading up to the purchase
8 of her Toyota Highlander in June 2009, Ms. Brazdys saw advertisements for Toyota
9 vehicles in magazines, in brochures at the dealership, and on Toyota's website.
10 Although she does not recall the specifics of the many Toyota advertisements she
11 saw before she purchased her Highlander, she does recall that safety and reliability
12 were consistent themes across the advertisements she saw. Those representations
13 about safety and reliability influenced her decision to purchase her Highlander. Had
14 those advertisements or any other materials disclosed that Toyota vehicles could
15 accelerate suddenly and dangerously out of the driver's control and lacked a fail-safe
16 mechanism to overcome this, she would not have purchased her Highlander, and at a
17 minimum has overpaid for her vehicle.
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21 33. Plaintiff Joseph Hauter is a resident and citizen of California. He owns a
22 2008 Toyota Tundra. Mr. Hauter experienced two SUA incidents. The first incident,
23 in late December 2009 or early January 2010, occurred when Mr. Hauter was pulling
24 into a gas station. When Mr. Hauter had his foot on the brake pedal, the car suddenly
25 accelerated. He slammed on his brakes, but his engine continued to race. When his
26 vehicle slowed down, he was able to put the vehicle in park. The second incident
27 occurred on January 19, 2010, when Mr. Hauter was approaching a left turn lane and
28

1 began to apply the brakes. The vehicle suddenly accelerated. Mr. Hauter stood on the
2 brake pedal with both feet while the vehicle continued to lurch forward, until the
3 vehicle finally slowed and stopped. After the second incident, Mr. Hauter notified his
4 dealer of the two incidents. The dealer performed the recall repair for the pedal on
5 March 30, 2010. Mr. Hauter saw advertisements for Toyota vehicles on television, in
6 magazines, on billboards, in brochures at the dealership, and on the Internet during the
7 many years before he purchased his Tundra on March 8, 2008. Although he does not
8 recall the specifics of the many Toyota advertisements he saw before he purchased his
9 Tundra, he recalls that safety and reliability were consistent themes across the
10 advertisements he saw. Those representations about safety and reliability influenced
11 his decision to purchase his Tundra. Had those advertisements or any other materials
12 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
13 driver's control and lacked a fail-safe mechanism to overcome this, he would not have
14 purchased his Tundra. He certainly would not have paid as much for it.

17 34. Plaintiffs Dr. Aly A. Mahmoud and Lucinda K. Mahmoud are residents
18 and citizens of California. They owned a 2004 Corolla, which they purchased new.
19 The Mahmouds were pulling into a parking spot with Dr. Mahmoud's foot on the
20 brake. The car had almost come to a complete stop when suddenly the engine surged
21 and the car shot forward about six feet. It ran over the parking stop and came to a rest
22 up against a chain link fence. Dr. Mahmoud turned off the vehicle. Mrs. Mahmoud
23 then got into the driver's seat to back the car away from the fence. When she started
24 the car, it initially ran at idle, then without any input from her, the engine again surged
25 to a high RPM. The car was then towed to the Toyota dealership. Mr. Craig Smith,
26 from the Toyota Collision Center, called Dr. Mahmoud, informed him that when he
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1 had attempted to move the car at the dealership, the engine had once again surged out
2 of control, and that he had determined that the throttle was stuck in the open position.
3 He told them he had emailed Toyota “Corporate” to advise them of the situation.
4 Dr. and Mrs. Mahmoud later received a letter from Toyota stating that there was
5 nothing wrong with the vehicle other than the crash damage. Dr. Mahmoud attempted
6 to sell the car to the Toyota dealership, but was offered only \$7,000.00 due to its
7 depreciated value. Dr. Mahmoud was later able to sell the car to a private party, but
8 still lost money on the sale. The Mahmouds understood that Toyota had a reputation
9 for safety. This understanding was acquired, in part, from Toyota advertising they
10 viewed on television, on billboards, in newspapers, and in magazines. If they had
11 known or if Toyota had disclosed that Toyota vehicles could accelerate suddenly and
12 dangerously out of the driver’s control and lacked a fail-safe mechanism to overcome
13 this, they would not have purchased their Corolla, and suffered depreciation in value
14 due to their overpayment at the time of purchase due to existence of the defects.
15

16
17 35. Plaintiff John Moscicki is a resident and citizen of California. He owns a
18 2007 Toyota Camry LE, which he purchased as a certified used vehicle from a Toyota
19 dealer in Oregon. Mr. Moscicki has experienced five sudden unintended acceleration
20 incidents while living in Oregon. During these incidents, the “gas pedal went to the
21 floor.” Mr. Moscicki saw advertisements for Toyota vehicles on television, in
22 magazines, on billboards, in brochures at the dealership, and on the Internet for many
23 years before he purchased his Toyota Camry in November 2007. Although he does
24 not recall the specifics of the many advertisements he saw before he purchased his
25 Camry, he recalls that safety and reliability were consistent themes across the
26 advertisements he saw. Those representations about safety and reliability influenced
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28

1 his decision to purchase his Camry. Had those advertisements or any other materials
2 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
3 driver's control and lacked a fail-safe mechanism to overcome this, he would not have
4 purchased his Camry, or he certainly would not have paid as much for it, and suffered
5 depreciation in value due to the existence of the defects.
6

7 36. Plaintiff Peggie Perkin is a resident and citizen of California. She
8 owned a 2005 Lexus ES 330. She was involved in a collision as a result of SUA on
9 May 24, 2010. Ms. Perkin was driving between 5-10 mph in a parking lot when the
10 engine revved and the car suddenly accelerated rapidly up to 35 mph, despite
11 application of the brakes. Ms. Perkin made a 90-degree turn to avoid a collision with
12 vehicles and pedestrians around the store front, but ended up hitting three cars and
13 then stopping. She tried to turn off the car with such force that the key broke. After
14 the collision, Ms. Perkin demanded in writing that either the dealer or Toyota Motor
15 Sales, U.S.A., Inc. repurchase the vehicle; neither did so. After the ES 330 was
16 repaired, Ms. Perkin traded it in and received substantially less value than she would
17 have received if the vehicle did not have the SUA defect. Ms. Perkin saw
18 advertisements for Lexus vehicles on television, in magazines, on billboards, in
19 brochures at the dealership, and on the Internet during the year before she purchased
20 her Lexus ES 330 on February 28, 2009. Although she does not recall the specifics
21 of the many Lexus advertisements she saw before she purchased her ES 330, she
22 does recall that reliability was a consistent theme across the advertisements she saw.
23 Those representations about reliability influenced her decision to purchase her
24 ES 330. Had those advertisements or any other materials disclosed that Lexus
25 vehicles could accelerate suddenly and dangerously out of the driver's control and
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1 lacked a fail-safe mechanism to overcome this, she would not have purchased her
2 ES 330. She certainly would not have paid as much for it.

3 37. Plaintiffs Thomas F. and Catherine A. Roe are residents and citizens of
4 California. They own a 2006 Lexus ES 330. On July 24, 2009, Mrs. Roe
5 experienced a collision as a result of SUA. When she was pulling into a driveway
6 and slowing to a stop, the engine of the car unexpectedly roared, the vehicle surged
7 forward, then crashed over a low cement wall and knocked down a metal rail fence.
8 The car finally came to a rest on top of the collapsed fence with the right front wheel
9 partially submerged in a backyard pool. The Roes sent a letter to Toyota Motor
10 Sales reporting the SUA incident. Toyota stated that the car could not be inspected
11 because it had already been repaired from the collision, and Toyota was “unable to
12 offer further assistance in this matter.” The Roes saw advertisements for Lexus
13 vehicles on television and in newspapers during the years prior to purchasing the
14 ES 330 on March 29, 2009. Although they do not recall the specifics of the many
15 Lexus advertisements they saw before they purchased the ES 330, they do recall that
16 safety and reliability were consistent themes across the advertisements they saw.
17 They also reviewed the window sticker on their vehicle, warranty information, and
18 news reports based on information supplied from Toyota press releases. Those
19 representations about safety and reliability influenced their decision to purchase their
20 ES 330. Had those advertisements, window sticker, warranty information, news
21 reports, or any other materials disclosed that Lexus vehicles could accelerate
22 suddenly and dangerously out of the driver’s control and lacked a fail-safe
23 mechanism to overcome this, they would not have purchased their ES 330. They
24 certainly would not have paid as much for it.
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1 38. Plaintiffs Janette and Tully Seymour are residents and citizens of
2 California. They own a 2002 Lexus ES 300. In November or December 2008,
3 Mrs. Seymour experienced a SUA incident when she was pulling out of the garage at
4 her home. She had her foot on the brake, put the transmission in reverse and then
5 moved her foot off the brake and lightly applied the accelerator. At that moment the
6 vehicle accelerated rapidly, and the car shot out of the garage and down the driveway.
7 Mrs. Seymour sensed the car continuing to accelerate even as she applied the brake.
8 The car traveled the length of the driveway (30-40 feet), and she was unable to stop
9 the car until the rear wheels had extended into the street. Shortly after learning of the
10 accident involving CHP Officer Saylor and his family, Mr. Seymour took the Lexus to
11 the dealership and asked if there was a plan to remedy the SUA problem; the
12 dealership stated there was no problem with this model. The Seymours saw
13 advertisements for Lexus vehicles on television, on the Internet, in newspapers, in
14 brochures at the dealership, and in magazines during the period before they leased and
15 then purchased their Lexus ES 300. They also reviewed the window sticker and
16 warranty information. Although they do not recall the specifics of the many Lexus
17 advertisements they saw before they leased and then purchased their Lexus ES 300,
18 they do recall that safety and reliability were a consistent theme across the
19 advertisements they saw. Those representations about safety and reliability influenced
20 their decision to purchase their Lexus ES 300. Had those advertisements, window
21 sticker, warranty information, or any other materials disclosed that Lexus ES 300
22 vehicles could accelerate suddenly and dangerously out of the driver's control and
23 lacked a fail-safe mechanism to overcome this, they would not have leased and then
24 purchased their Lexus ES 300. They certainly would not have paid as much for it.

1 39. Plaintiff Linda Tang is a resident and citizen of California. She owned a
2 2007 Camry. On March 1, 2010, nine days after Toyota performed the pedal recall
3 repair on Ms. Tang's vehicle, she had a SUA incident. Ms. Tang was making a left
4 turn when her vehicle began accelerating on its own. Her vehicle continued to
5 accelerate as she turned; she felt she had no control over her vehicle. She stepped on
6 the brake and was able to turn the engine off in the middle of the street. She waited a
7 few minutes, restarted the vehicle, and the RPMs immediately increased again. She
8 again turned the engine off. Ms. Tang never drove the vehicle again after her SUA.
9 In June 2010, she traded the vehicle in for a non-Toyota vehicle at a substantial loss.
10 She saw advertisements for Toyota vehicles on television, in magazines, on
11 billboards, in brochures at the dealership, and on the Internet during the many years
12 before she purchased her Toyota Camry on February 3, 2007. Although she does not
13 recall the specifics of the many Toyota advertisements she saw before she purchased
14 her Camry, she does recall that safety and reliability were consistent themes across
15 the advertisements she saw. Those representations about safety and reliability
16 influenced her decision to purchase her Camry. Had those advertisements or any
17 other materials disclosed that Toyota vehicles could accelerate suddenly and
18 dangerously out of the driver's control and lacked a fail-safe mechanism to overcome
19 this, she would not have purchased her Camry, or she certainly would not have paid
20 as much for it, and suffered depreciation in value due to the existence of the defects.

24 **2. Florida**

25 40. Plaintiff Israel Flor is a resident and citizen of Florida. Mr. Flor is the real
26 party in interest for Ziva Goldstein, who also is a resident and citizen of Florida, and
27 who was previously the named plaintiff in this lawsuit. Mr. Flor is Ms. Goldstein's
28

1 brother in law. In January, 2010 Ms. Goldstein leased a 2010 Camry LE for Mr. Flor
2 and his wife (Ms. Goldstein's sister). Although Ms. Goldstein's name is on the lease,
3 Mr. Flor was the person who made the decision to lease the Camry and he is the
4 primary driver of the vehicle. Mr. Flor has made all of the lease payments on the
5 vehicle, including the down payment and all monthly payments, and he has paid for the
6 vehicle's upkeep and insurance. Mr. Flor saw advertisements for Toyota vehicles on
7 television and in newspapers during the years prior to leasing the Toyota Camry LE in
8 January, 2010. Although he does not recall the specifics of the many Toyota
9 advertisements he saw before leasing the Camry LE, he does recall that safety and
10 reliability were consistent themes in Toyota advertisements, and particularly in
11 television advertisements. He also reviewed the window sticker on her vehicle,
12 warranty information, and news reports based on information supplied from Toyota
13 press releases. Those representations about safety and reliability influenced his
14 decision to lease the Camry LE. Had those advertisements, window sticker, warranty
15 information, news reports, or any other materials disclosed that Toyota vehicles could
16 accelerate suddenly and dangerously out of the driver's control and lacked a fail-safe
17 mechanism to overcome this, Mr. Flor would not have leased the Camry LE. He
18 certainly would not have paid as much for it. During the time that Mr. Flor has been
19 leasing the Camry LE, he has experienced several SUA incidents at various places near
20 his home. Although the SUA incidents did not result in a collision, Mr. Israel brought
21 the vehicle in to his Toyota dealership for repairs and notified the service department
22 and a salesperson at the Toyota dealership about the SUA incidents.

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27 41. Charles Henry is a resident and citizen of Florida. He bought a 2007
28 Toyota Avalon new from a dealer in 2007. Five months later, Mr. Henry

1 experienced a SUA, which ended only when the vehicle hit a ditch. He and his two
2 children escaped injuries and the vehicle was not damaged. Mr. Henry immediately
3 called the dealer who towed it to its shop for an inspection. The dealer blamed the
4 floor mats and gave Mr. Henry a new set of mats to use. In 2009, Mr. Henry's wife,
5 Sharon, experienced another SUA while driving the Avalon. Even though
6 Mrs. Henry was pressing the brake, the Avalon accelerated out of control and
7 collided with a guardrail, bouncing off it several times before finally stopping. The
8 driver of the vehicle behind her called the police and explained that he saw the
9 Avalon brake lights while this happened. The Avalon was totaled. The Henrys had
10 put their savings into the Avalon and couldn't afford to buy a new car. Mr. Henry
11 suffered economic loss because he was not fully compensated for the value of his
12 Toyota Avalon. The Henrys wrote to Toyota about their experiences but have not
13 been offered any compensation. Mr. Henry chose the Avalon because he thought
14 Toyotas were good cars and would last. Before purchasing his Avalon, Mr. Henry
15 saw advertisements for Toyota vehicles on television and billboards, and in
16 newspapers and brochures. Although Mr. Henry does not recall the specifics of the
17 many advertisements he saw before he purchased the Avalon, he does recall that
18 safety and reliability were consistent themes across the advertisements he saw.
19 Those representations about safety and reliability influenced his decision to purchase
20 the Avalon. Had those advertisements, or any other materials, disclosed that Avalon
21 vehicles could accelerate suddenly and dangerously out of the driver's control and
22 lacked a fail-safe mechanism to overcome this, he would not have purchased his
23 Avalon. He certainly would not have paid as much for it.
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1 42. Plaintiff Linda Savoy is a resident and citizen of Florida. She owns a
2 2009 Camry LE. Ms. Savoy saw advertisements for Toyota vehicles on television
3 and in newspapers during the years prior to purchasing her Toyota Camry LE on
4 September 20, 2008, from a Toyota dealer in Florida. Since purchasing her Camry
5 LE, Ms. Savoy has experienced multiple SUA events in the vehicle. After the first
6 event, she took the car to her Toyota dealership to notify them of the problem and to
7 have it diagnosed and repaired. The vehicle was also subject to the floor mat and gas
8 pedal recalls, and Ms. Savoy brought the Camry LE into the dealership to have that
9 work performed. Although she does not recall the specifics of the many Toyota
10 advertisements she saw before she purchased her Camry, she does recall that safety
11 and reliability were consistent themes across the advertisements that she saw. She
12 also reviewed the window sticker on her vehicle, warranty information, and news
13 reports based on information supplied from Toyota press releases. Those
14 representations about safety and reliability influenced her decision to purchase her
15 Camry. Had those advertisements, window sticker, warranty information, news
16 reports, or any other materials disclosed that Toyota vehicles could accelerate
17 suddenly and dangerously out of the driver's control and lacked a fail-safe
18 mechanism to overcome this, she would not have purchased her Camry. She
19 certainly would not have paid as much for it.

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23 43. Plaintiff Elizabeth I. Van Zyl is a resident and citizen of Florida. She
24 leases a 2010 Toyota Camry LE. Ms. Van Zyl has experienced numerous SUA
25 incidents since she has leased the Camry LE. During the SUA incidents, the vehicle
26 surges forward with varying degrees of strength, speed and duration. Ms. Van Zyl
27 has reported the surging to her dealer and has brought her car in to the dealership on
28

1 numerous occasions seeking a solution to the SUA problem, including recall work
2 pursuant to Toyota's notifications. She has also reported the problem to the Toyota
3 Customer Experience Center. Yet despite her efforts, the problem persists, and the
4 Camry continues to exhibit its propensity for SUA. Ms. Van Zyl tried to trade in her
5 Toyota for a Honda, but the dealer did not want her Toyota as a trade-in. In June
6 2012, after experiencing further SUA incidents in her leased Camry such that
7 Ms. Van Zyl felt that the vehicle could no longer be driven safely, Ms. Van Zyl again
8 contacted Toyota in an attempt to secure Toyota's agreement to accept the early
9 return of her leased Camry and waive the final three lease payments and the vehicle
10 return fee. Ms. Van Zyl was informed that she needed to contact a Toyota customer
11 service department in California, which she did. The Toyota representative told
12 Ms. Van Zyl that he needed to consult with his superiors before he could inform her
13 whether Toyota would accept the early return of her leased Camry. A few days later,
14 the representative contacted Ms. Van Zyl and informed her that Toyota would only
15 accept the early return of her vehicle and waive the remaining lease payments and
16 vehicle return fee if she dismissed her class action claim. Ms. Van Zyl declined, and
17 later returned her vehicle to the dealership where she had leased the vehicle.

21 Ms. Van Zyl paid more for her lease than she would have otherwise agreed to
22 pay had she known of the defect. Because of that defect, Ms. Van Zyl's lease
23 payments went toward a vehicle that had failed of its essential purpose. She saw
24 advertisements for Toyota vehicles on television, in newspapers, in magazines, in
25 brochures at the dealership, and on the Internet, during the ten years before she
26 leased her Toyota Camry on August 23, 2009. Although Ms. Van Zyl does not recall
27 the specifics of the many Toyota advertisements she saw before she leased her
28

1 Camry, she does recall that safety and reliability were a consistent theme across the
2 advertisements she saw. Those representations about safety and reliability
3 influenced her decision to lease her Camry. Had those advertisements or any other
4 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
5 out of the driver's control and lacked a fail-safe mechanism to overcome this, she
6 would not have leased her Camry. She certainly would not have paid as much for it.
7

8 **3. New York**

9 44. Plaintiff Charmayne Bennett is a resident and citizen of New York. She
10 owned a 2008 Toyota Camry that she had purchased in or about April or May 2008
11 from a dealer in New York. On October 14, 2010, she experienced a collision caused
12 by SUA while parking her vehicle. While driving forward into a parking space, with
13 her foot on the brake, the Camry suddenly shot forward, jumped the curb and went into
14 a building. The Camry was totaled and Ms. Bennett suffered head, neck and shoulder
15 injuries. Two weeks before the SUA accident Ms. Bennett had taken the vehicle in for
16 the pedal recall work pursuant to her third recall notice. Ms. Bennett suffered
17 economic loss because she was not fully compensated for the value of her Toyota
18 Camry. Before purchasing her Camry, Ms. Bennett saw advertisements for Toyota
19 vehicles on television and in newspapers and brochures and billboards. Although
20 Ms. Bennett does not recall the specifics of the many advertisements she saw before
21 she purchased her Camry, she does recall that reliability was a consistent theme across
22 the advertisements she saw. Had those advertisements or any other materials disclosed
23 that Camry vehicles could accelerate suddenly and dangerously out of the driver's
24 control and lacked a fail-safe mechanism to overcome this, she would not have
25 purchased her Camry. She certainly would not have paid as much for it.
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1 45. Plaintiffs Rocco and Bridie Doino are residents and citizens of New
2 York. They owned a 2010 Toyota Camry. On April 21, 2010, the Doinos
3 experienced a collision caused by SUA while entering a parking lot. The Camry
4 suddenly accelerated and landed on two parked cars. The Camry was totaled. When
5 purchasing their car, the dealer assured the Doinos that SUA was a floor mat
6 problem, and that they would not have a floor mat or SUA issue. The Doinos
7 suffered economic loss because they were not fully compensated for the value of
8 their Toyota Camry. The Doinos saw advertisements for Toyota vehicles on
9 television and in brochures at the dealership during the period before they purchased
10 their Camry. They also reviewed the window sticker and warranty information.
11 Although they do not recall the specifics of the many Camry advertisements they
12 saw before they purchased their Camry, they do recall that safety was a consistent
13 theme across the advertisements they saw. Those representations about safety
14 influenced their decision to purchase their Camry. Had those advertisements,
15 window sticker, warranty information, or any other materials disclosed that Camry
16 vehicles could accelerate suddenly and dangerously out of the driver's control and
17 lacked a fail-safe mechanism to overcome this, they would not have purchased their
18 Camry. They certainly would not have paid as much for it.

19 46. Plaintiffs John and Mary Ann Laidlaw are residents and citizens of New
20 York. They leased a 2010 Toyota Camry LE in December 2009. After the sudden
21 acceleration issues were uncovered by the media, the Laidlaws were afraid to drive
22 the vehicle, even though they had leased it only weeks earlier. The news regarding
23 Toyota vehicles' propensity for sudden unintended acceleration completely
24 undermined the Laidlaws' faith in the vehicle – it was not the reliable and safe

1 vehicle they believed they were getting when they entered into the lease agreement.
2 As a result, the Laidlaws took the Camry back to the dealer with just 980 miles on it
3 and having leased the car for just one month. The dealer refused to give them their
4 money back. The Laidlaws surrendered the vehicle by leaving it in the dealer's lot.
5 During this time, the Laidlaws actively sought a solution to their problem by filing
6 complaints with the Better Business Bureau and the New York State Attorney
7 General's Office, and by contacting Toyota directly in an attempt to get Toyota to
8 agree to rescind the lease and refund their money. When the Laidlaws leased the
9 vehicle, they were required to pay \$2,712.10, comprised of a \$2,343.60 "Capitalized
10 Cost Reduction" payment, the first month's lease payment of \$180.00, and other
11 costs and fees. If the Laidlaws' Camry had been the safe and reliable car they
12 thought they were leasing and not a dangerous vehicle prone to SUA events, the
13 Laidlaws would have kept the vehicle. Had they been able to do so, the Laidlaws'
14 lease payments and their Capitalized Cost Reduction Payment would effectively
15 have served as a down payment on the car – if they chose to purchase the car at the
16 end of the lease for its "Residual Value." Instead, because they were forced to return
17 their vehicle because it was unsafe, they lost the benefit of their down payment.
18 Furthermore, after the Laidlaws returned the vehicle to the dealership, Toyota
19 Financial Services took possession of the vehicle and sold it at auction. Toyota
20 Financial Services used the Auction Price to determine the amount it claimed the
21 Laidlaws owed to it for terminating their lease. Toyota Financial Services then
22 notified the Laidlaws that they owed \$4,648.21 to TFS as a result of their lease
23 termination. When the Laidlaws refused to pay and disputed the charge, TFS
24 reported the alleged debt to a credit bureau; the Laidlaws were also contacted by a

1 collection agency law firm in an attempt to collect the alleged debt. When the
2 Laidlaws' car was sold at auction by TFS, it fetched a price that was far lower than it
3 would have been if Toyota vehicles were not prone to SUA events. As a result, the
4 Laidlaws' debt to TFS was higher than it would have been if the car was not prone to
5 the SUA defect – the lower sales price directly resulted in a higher debt owing by the
6 Laidlaws to TFS. Before the Laidlaws leased the Camry, they saw advertisements
7 for Toyota vehicles on television and in brochures at the dealership for a few months
8 before they purchased their Camry on December 23, 2009. Although they do not
9 recall the specifics of the many Toyota advertisements they saw before they
10 purchased their Avalon, they recall that safety and reliability were consistent themes
11 across the advertisements they saw. Had advertisements or any other materials
12 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
13 driver's control and lacked a fail-safe mechanism to overcome this, they would not
14 have leased their Camry. They certainly would not have paid as much for the lease.
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17 47. Plaintiff Judy Veitz is a resident and citizen of New York. She
18 purchased a new 2005 Prius from a dealer in New York in or about July 2005. She
19 bought the Prius because she believed Toyotas were safe and reliable vehicles. This
20 understanding was acquired, in part, from Toyota advertising she viewed on
21 television, on billboards, in newspapers, in magazines, in brochures and on the
22 Internet during the ten years before buying her Prius. Ms. Veitz had dreamed of
23 buying a new Toyota. Ms. Veitz does not recall the specifics of the many Toyota
24 advertisements she saw before she purchased her Prius, but she does recall that
25 safety and reliability were consistent themes across the advertisements she saw. Had
26 those advertisements or any other materials disclosed that Toyota vehicles could
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1 accelerate suddenly and dangerously out of the driver's control and lacked a fail-safe
2 mechanism to overcome this, she would not have purchased her Prius. She certainly
3 would not have paid as much for it. Ms. Veitz traded in her Prius in 2010 when she
4 and her daughter became concerned it could experience a SUA. She received far less
5 than she would have expected for the Prius if it had not been prone to SUA.
6

7 48. Each of the Consumer Plaintiffs have purchased or leased a car with a
8 defect and in a transaction that occurred in the context of a multibillion dollar
9 longstanding nationwide advertising campaign that involved representations as to
10 safety, reliability and quality. During the transaction no disclosure occurred of the
11 defects rendering their vehicles unsafe, unreliable and of inferior quality. As a
12 result, each Plaintiff did not receive the benefit of their bargain and/or overpaid for
13 their vehicles, made lease payments that were too high and/or sold their vehicles at a
14 loss when the public gained partial awareness of the defect.
15

16 **B. Non-Consumer Plaintiffs**

17 49. G&M Motors, Inc. is an Ohio corporation headquartered in Cleveland,
18 Ohio. G&M is in the business of purchasing and reselling used automobiles. G&M
19 saw advertisements and other marketing materials for Toyota vehicles, in print
20 communication in the industry and on television and in magazines, during the two to
21 three years before it purchased the used Toyota models described below. G&M
22 recalls that safety was a consistent theme represented by Toyota in the materials and
23 advertisements. Those representations about safety influenced G&M's decision to
24 purchase these models. G&M would not have purchased these used models for the
25 purpose of resale to the consumers if those advertisements had truthfully disclosed
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1 that Toyota vehicles could accelerate suddenly and dangerously out of the driver's
2 control and lacked fail-safe mechanisms to overcome this.

3 50. At the time of the Toyota's Stop Sale Order in January, 2010, G&M was
4 the owner of a used 2008 Toyota Tundra and a used 2007 Toyota Camry XLE which
5 it had purchased for the specific purpose of resale to the general public for a profit.
6 The Stop Sale Order applied to all vehicles subject to the Toyota "recall." The
7 above-described Toyota Camry and the Toyota Tundra were covered by the Stop Sale
8 Order. Because of the Stop Sale Order from Toyota, G&M was not able to sell these
9 vehicles to the general public. Although Toyota lifted the Stop Sale Order in cases of
10 new cars for its Toyota dealerships, it did not do so for used car dealers like G&M
11 Motors nor for the rest of those in the class of non-consumer plaintiffs. G&M and
12 others similarly situated were burdened with and damaged by the continuing Stop
13 Sale Order issued in January, 2010, and never lifted for G&M or members of the
14 class of used car dealers. When it lifted the Stop Sale Order for its own dealers of
15 new cars, Toyota informed the LOS ANGELES TIMES, February 5, 2010,

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18 "We now have more than enough parts at dealers to take
19 care of the flow of repairs. Dealers may sell a new car if
20 the repair is made," said Mike Michels, a Toyota
21 spokesman. "There is no single point in time when the
22 stop sale would be lifted. It will be car by car."
23

24 <http://articles.latimes.com/2010/feb/05/business/la-fi-toyota-earns5-2010feb05>

25 51. Toyota did not afford this lift of the stop sale order to private used car
26 dealers, like G&M, which were not holding new Toyota cars, but used ones. G&M
27 and others similarly situation used car dealers did not have the benefit of Toyota
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1 sending “parts to take care of the flow of repairs.” Toyota did not notify anyone
2 other than its own dealers that it would bear the cost to provide and install retrofit
3 parts. Just the opposite, Toyota warned that the Stop Sale Order remained in force
4 and had not been lifted, “There is no single point in time when the stop sale would be
5 lifted. It will be car by car.” G&M and others therefore continued to honor the Stop
6 Sale Order. This resulted in damage to them, regardless of the “defective” status of
7 the vehicles. These losses include the daily cost for holding the used vehicle in
8 inventory. They also include the loss suffered by G&M and others when – seeing no
9 fix by Toyota for them like what Toyota gave its own dealers – they shouldered the
10 cost of parts and labor for a retrofit. Finally, the loss included the diminution of sale
11 price due to the Stop Sale Order. G&M lost money not only from the cost of
12 carrying the vehicles but also from the cost of parts and labor to retrofit, as well as
13 the ultimate reduced sale price despite the retrofit. For the Tundra, G&M lost
14 \$973.35 which it spent in repair costs for the retrofit, and it lost profit because of the
15 diminution of value in the sale of the Tundra to a consumer despite the retrofit. For
16 the Camry, G&M lost profit when it sold the vehicle at a diminished price at auction
17 to another dealer to avoid incurring the cost for retrofit.

21 52. Plaintiff Green Spot Motors Co. (“Green Spot Motors”) is a California
22 corporation with its principal place of business in Salinas, California. Plaintiff Green
23 Spot Motors is an auto dealership. In mid-2009, Green Spot Motors purchased a
24 2007 Toyota Camry. Later that year, Green Spot Motors purchased a 2009 Toyota
25 Camry from Toyota. Green Spot Motors purchased Toyota vehicles that were not up
26 to the safety and reliability standards touted in the television and magazine
27 advertising media which it reviewed prior to the purchase of the Camry vehicles
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1 identified in this complaint, which were acquired for re-sale in the late summer and
2 early fall of 2009. As a result of the wrongful and deceptive actions and business
3 practices of Toyota, Green Spot Motors purchased vehicles that were not of the
4 quality or reliability that was advertised. As a result, Green Spot Motors overpaid
5 for the vehicles and has been unable to re-sell them even at substantially reduced
6 prices. If Toyota had disclosed the nature and extent of the problems alleged herein,
7 Green Spot Motors would not have purchased a vehicle from Toyota, or would not
8 have purchased the vehicles for the prices paid. The value of Green Spot Motors'
9 two Camry vehicles has diminished as a result of the SUA defect. In addition, Green
10 Spot Motors has suffered lost profits and other economic losses due to its inability to
11 sell the Toyota vehicles.
12

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14 53. Plaintiff Jerry Baker Auto Sales, LLC is a family-owned and operated
15 independent automotive sales business in Sedalia, Missouri. It has been in
16 continuous operation for almost 40 years, since 1972. Jerry Baker Auto Sales, LLC
17 employs 10 people in its sales and service departments. Jerry Baker Auto Sales,
18 LLC obtains vehicles for sale from a variety of sources, such as trade-ins, auctions,
19 and direct purchases from individuals and licensed franchisees of various
20 manufacturers, including Toyota. Jerry Baker Auto Sales purchased vehicles that
21 were not of the safety and reliability that was advertised in the advertisements that
22 Jerry Baker Auto Sales saw on television in the years before it purchased the 2008
23 Highlander and 2007 Tacoma for re-sale or lease at the dealership. Normally, it
24 carries some Defective Vehicles (defined in Paragraph 80, *infra*) for sale on its lot.
25 At the time of Toyota's Stop Sales Order, Jerry Baker Auto Sales, LLC owned a
26 2008 Toyota Highlander and a 2007 Toyota Tacoma. Both of these vehicles were
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1 the subject of Toyota's Stop Sales Order and had been purchased by Jerry Baker
2 Auto Sales, LLC for the purpose of reselling them at a profit to the general public.
3 Because of Toyota's Stop Sales Order, Jerry Baker Auto Sales, LLC was required to
4 hold the vehicles and not place them for sale to the general public. As a result, Jerry
5 Baker Auto Sales, LLC overpaid for the vehicles. The value of Jerry Baker Auto
6 Sales, LLC's Highlander and Tacoma have diminished as a result of the SUA defect.
7 In addition, Jerry Baker Auto Sales, LLC has suffered lost profits and other
8 economic losses due to its inability to sell the Toyota vehicles.
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10 54. Plaintiff Auto Lenders Liquidation Center, Inc. ("Auto Lenders") was
11 established over twenty years ago and is a New Jersey S corporation with no
12 partnerships. Auto Lenders is a residual value insurer, guarantor and lease maturity
13 vehicle liquidator. In addition to its wholesale division, Auto Lenders also operates
14 five New Jersey retail automobile dealerships and service centers. Its retail
15 operations help maximize overall performance of the residual guarantee. In addition,
16 Auto Lenders supports both its retail and wholesale operations with a state-of-the-art,
17 40-thousand-square-foot reconditioning facility located on nineteen acres. Auto
18 Lenders is contracted directly to a third party, a regional new vehicle lessor, Hann
19 Financial Service Corporation ("Hann"). Hann is a wholly owned subsidiary of
20 Susquehanna Bankshares, Inc. Acting as Hann's residual insurer and guarantor,
21 Auto Lenders is ultimately responsible, upon lease maturity, for a vehicle's residual
22 value. Hann's lease portfolio currently consists of over a billion dollars in
23 receivables and includes various Toyota and Lexus vehicles. Auto Lenders insured
24 the residual value for hundreds of Defective Vehicles and has suffered (and
25 continues to suffer) economic harm as a direct and legal result of the diminished
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1 value of these vehicles. Plaintiff Auto Lenders saw advertisements for Toyota and
2 Lexus vehicles on television, in magazines, and on billboards during the entire time
3 it insured and guaranteed residuals on the Toyota and Lexus models in its portfolio.
4 Although Auto Lenders does not recall the specifics of the many Toyota and Lexus
5 advertisements it saw before deciding to include the vehicles in its portfolio, it does
6 recall that safety and reliability were consistent themes across the advertisements it
7 saw. Those representations about safety and reliability influenced the decision to
8 engage in the transactions. Had those advertisements disclosed that Toyota and/or
9 Lexus vehicles could accelerate suddenly and dangerously out of the driver's control
10 and lacked a fail-safe mechanism to overcome this, it would not have insured or
11 guaranteed the residuals on the vehicles for the amount that it did. Indeed, if Auto
12 Lenders decided to engage in the transactions at all in light of such advertising, it
13 would have insured and guaranteed the residuals on them in a lower amount.

16 55. As alleged above, Plaintiff Auto Lenders is a residual value insurer and
17 guarantor and a lease maturity vehicle liquidator. In other words, before a new
18 vehicle's initial lease begins, Auto Lenders sets a residual value for the vehicle,
19 using a proprietary and confidential process developed and refined over several years
20 and at a considerable cost. The residual value is used in calculating the financial
21 particulars of the vehicle lease. Auto Lenders then adds to the residual the predicted
22 cost of reconditioning and liquidating the vehicle and an appropriate profit margin.
23 Auto Lenders is ultimately responsible, at lease maturity, for reconditioning and
24 liquidating the off-lease vehicles and paying the residual to the leasing bank, which,
25 in the case of the Subject Vehicles, was Hann Financial Services Corporation ("Hann
26 Financial"), a subsidiary of Susquehanna Bankshares, Inc.
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1 56. As a result of its contracts with Hann Financial, off-lease vehicles are
2 delivered to Auto Lenders for reconditioning and sale, and Auto Lenders becomes
3 the owner of each off-lease vehicle upon its contractually required payment of the
4 residual. Ownership then transfers from Auto Lenders to the vehicle purchaser.

5
6 57. For several years prior to September 2009, Auto Lenders insured and
7 guaranteed residuals on Toyota and Lexus vehicles. Those vehicles – for example,
8 the Toyota Camry and the Toyota Corolla – became staples of Auto Lenders' fleet
9 because they predictably and consistently maintained resale value, they had a
10 seemingly well-deserved reputation for quality, dependability and reliability, and
11 they seemed to conform to Defendants' claims that Toyota and Lexus vehicles were
12 safe. As set forth in detail above, that changed in mid-2009, when the propensity of
13 Toyota vehicles to suddenly and uncontrollably accelerate against the intentions of
14 the driver – a defect known to Toyota for years – became known publicly.

15
16 58. On September 1, 2009, Auto Lenders was insuring the residual values
17 of approximately 3,456 Toyota vehicles still on lease or off-lease and in inventory,
18 and approximately 2,231 Lexus vehicles still on lease or off-lease and in inventory.

19
20 59. Beginning in September 2009, the resale values for Toyota Vehicles
21 plummeted. In an effort to liquidate the flood of off-lease Toyota and Lexus
22 Vehicles, Auto Lenders made a business decision to lower prices on these vehicles.
23 The price reductions were, in large part, made systematically. At a certain price
24 point, the market reacted, and the vehicles began selling. Additionally, some of the
25 Toyota and Lexus vehicles were liquidated at auction.
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1 60. Between September 30, 2009, and September 20, 2010, Auto Lenders
2 sold approximately 1,668 Toyota vehicles. The difference between the predicted
3 market value of those vehicles and the actual sales revenue was \$5,465,325.90.

4 61. Between September 17, 2009, and September 20, 2010, Auto Lenders
5 sold approximately 895 Lexus vehicles. The difference between the predicted
6 market value of those vehicles and the actual sales revenue was \$5,873,527.18.

7 62. In a further attempt to mitigate losses and sell the Toyota and Lexus
8 vehicles, Auto Lenders transported 538 vehicles to Prestige Toyota in Mahwah, New
9 Jersey for administration of recall-related repairs. Auto Lenders spent \$80 per
10 vehicle to have the vehicles transported to the dealer, for a total of \$43,040.00.

11 63. Plaintiff Deluxe Holdings Inc. ("Deluxe Holdings"), dba Deluxe Rent a
12 Car, a Nevada corporation, operates a rental car business and has its "nerve center"
13 and principal place of business at 5315 W. 102nd Street, Los Angeles, California
14 90045. As of the date of the filing of the consolidated master complaint, Plaintiff
15 owns about 258 of the Subject Vehicles manufactured and sold by the Defendants, and
16 has previously owned about 105 of the Subject Vehicles during the relevant time
17 frame. The value of the Subject Vehicles owned by Deluxe Holdings has diminished
18 as a result of the SUA defect. Deluxe Holdings has also suffered damages for the
19 Subject Vehicles that it previously owned and sold at a loss. In addition, Deluxe
20 Holdings has suffered lost profits and other economic losses. Deluxe Holdings, by
21 and through its employees/agents, has had direct dealing during the relevant time
22 frame with the Defendants regarding the purchase of Toyota vehicles, so that Deluxe
23 Holdings is in privity with those Defendants. Deluxe has suffered a loss in sales of
24 more than 200 Toyotas from September 1, 2009, to the present as well as through a

1 diminution in value of the fleet of Toyotas it still owns. Deluxe has also lost rental
2 income due to the public's refusal to rent Toyota vehicles. Plaintiff Deluxe Holdings
3 saw advertisements for Toyota vehicles in marketing materials that Toyota provided
4 to fleet purchasers, and on television and in magazines during the two to three years
5 before it purchased the Toyota models on various dates as indicated in Deluxe's
6 Responses to Fact Information Sheets. Although Deluxe Holdings does not recall the
7 specifics of the many Toyota advertisements it saw before purchasing those models, it
8 does recall that safety was a consistent theme across the advertisements it saw. Those
9 representations about safety influenced its decision to purchase these models. Had
10 those advertisements disclosed that Toyota vehicles could accelerate suddenly and
11 dangerously out of the driver's control and lacked a fail-safe mechanism to overcome
12 this, Deluxe Holdings would not have purchased these models for use as a rental car
13 for Deluxe Holding's customers. It certainly would not have paid as much for them.

16 64. G&M, Green Spot Motors, Jerry Baker Auto Sales, Deluxe Holdings
17 and Auto Lenders are hereinafter referred to as the "Commercial Plaintiffs" or "Non
18 Consumer Plaintiffs."

19
20 **C. Additional Consumer Plaintiffs from Non Bellwether States**

21 65. Plaintiff Adam Aleszczyk is a resident of Illinois and the owner of a
22 2006 Toyota Tacoma. Mr. Aleszczyk is a police officer in Chicago, Illinois. He
23 experienced more than one SUA event in his Tacoma and also had a collision due to
24 SUA. While driving to work, his truck accelerated near an intersection; when the
25 brakes would not respond to stop the vehicle, Mr. Aleszczyk steered the vehicle into
26 two concrete barriers to avoid hitting other motorists. He has had the pedal and floor
27 mat recall repairs performed on the Tacoma. The floor mats were not near the pedal
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1 during any of the SUA events. He saw advertisements for Toyota vehicles on
2 television during the time before he purchased his Tacoma in September 2005.
3 Although he does not recall the specifics of the many Toyota advertisements he saw
4 before he purchased his 2006 Toyota Tacoma, he does recall that safety and
5 reliability were consistent themes across the advertisements he saw. Those
6 representations about safety and reliability influenced his decision to purchase his
7 Tacoma. Had those advertisements or any other materials disclosed that Toyota
8 vehicles could accelerate suddenly and dangerously out of the driver's control and
9 lacked a fail-safe mechanism to overcome this, he would not have purchased his
10 2006 Toyota Tacoma, or he certainly would not have paid as much for it. He has
11 also suffered loss due to the depreciation in value of his car due to the defect.
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14 66. Plaintiff Kathleen Allen is a resident of Indiana and owns a 2010 Toyota
15 Camry LE. She has experienced SUA in her vehicle. She saw advertisements
16 misrepresenting the safety of Toyota vehicles on television and in magazines during
17 the years prior to when she purchased her Toyota in August 2009. She also reviewed
18 the window sticker of her vehicle, warranty information, and news programs, which
19 she understood provided information supplied from Toyota press releases. Based on
20 these representations as to the safety of Toyota vehicles, Mrs. Allen purchased her
21 2010 Camry. Had these advertisements, window sticker, warranty information, news
22 programs, or any other materials disclosed that Toyota vehicles could accelerate
23 suddenly and dangerously out of the driver's control and lacked a fail-safe
24 mechanism to overcome this, Mrs. Allen would not have purchased her 2010 Camry,
25 or would not have paid as much for it. Mrs. Allen overpaid for her car as a car
26 subject to the defects at issue is not worth the same as a car free of defects.
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1 67. Plaintiff Jude Anheluk is a resident and citizen of Minnesota. He owns
2 a 2008 Toyota Camry. He saw advertisements for Toyota vehicles on television, in
3 magazines, on billboards, in brochures at the dealership, and on the Internet for at
4 least seven years before he purchased his Camry. Although he does not recall the
5 specifics of the many Toyota advertisements he saw before he purchased his Camry
6 in December 2007, he recalls that safety, reliability and quality were consistent
7 themes across the advertisements he saw. Those representations about safety,
8 reliability and quality influenced his decision to purchase his Camry. Had those
9 advertisements or any other materials disclosed that Toyota vehicles could accelerate
10 suddenly and dangerously out of the driver's control and lacked a fail-safe
11 mechanism to overcome this, he would not have purchased his Camry, or he
12 certainly would not have paid as much for it, and suffered depreciation in value due
13 to the existence of the defects.

14 68. Plaintiffs Joel and Lucy Barker are residents and citizens of Washington
15 State and own a 2010 Toyota Corolla. The Barkers purchased their Corolla on
16 March 3, 2010. The dealer did not tell the Barkers that their Corolla was subject to
17 the Toyota recall, and they did not become aware of this fact until they registered the
18 Corolla at the Toyota website. Dismayed with the dealer's failure to disclose the
19 recall at the time of sale, the Barkers met with the general manager of their dealer on
20 March 9, 2010, to discuss their concerns. At the meeting, the Barkers requested that
21 the dealer repurchase the Corolla and return their cash down payment along with the
22 trade in allowance, or at a minimum address their concerns about the car's resale
23 value. The dealer refused to repurchase the car or address their concerns about the
24 resale value. The Barkers saw advertisements for Toyota vehicles on television, in
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1 magazines, on billboards, in brochures at the dealership, and display ads while
2 driving past the dealership during the 10 years before they purchased their Toyota
3 Corolla on March 3, 2010. Although they do not recall the specifics of the many
4 Toyota advertisements they saw before they purchased their Corolla, they do recall
5 that safety and reliability were a consistent theme across the advertisements they
6 saw. Those representations about safety and/or reliability influenced their decision
7 to purchase their Corolla. Had those advertisements or any other materials disclosed
8 that Toyota vehicles could accelerate suddenly and dangerously out of the driver's
9 control and lacked a fail-safe mechanism to overcome this, they would not have
10 purchased their Corolla. If they had purchased it, they certainly would not have paid
11 as much for it.
12

13
14 69. Plaintiff Richard Benjamin is a resident and citizen of Missouri. He
15 owns a 2007 Toyota Sienna. Mr. Benjamin began investigating a trade of his 2007
16 Sienna for a 2011 Sienna just before the recalls were made public. He has seen his
17 trade-in value drop \$2,000 since the recalls according to KELLEY BLUE BOOK, NADA
18 GUIDE, and Edmunds.com. Mr. Benjamin saw advertisements for Toyota vehicles on
19 television, in magazines, on billboards, in brochures at the dealership, and on the
20 Internet for several years before he purchased his Toyota Sienna on October 25,
21 2007. Although he does not recall the specifics of the many Toyota advertisements
22 he saw before he purchased his Sienna, he recalls that safety and reliability were a
23 consistent theme across the advertisements he saw. Those representations about
24 safety and reliability influenced his decision to purchase his Sienna. Had those
25 advertisements or any other materials disclosed that Toyota vehicles could accelerate
26 suddenly and dangerously out of the driver's control and lacked a fail-safe
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1 mechanism to overcome this, he would not have purchased his Toyota Sienna, or he
2 would not have paid as much for it as he did.

3 70. Plaintiffs Albert and Wanda Bosse are residents and citizens of
4 Kentucky. They owned a 2002 Toyota Camry and currently own a 2006 Avalon and
5 a 2009 Corolla. They sold their Camry below market value after they experienced
6 SUA in the Camry. For years prior to purchasing their Toyotas on July 16, 2002,
7 and August 26, 2008, the Bosses reviewed information about Toyota in brochures at
8 the dealership, on the window stickers, in warranty information, and in news reports
9 based on Toyota press releases. Based on these misrepresentations as to the safety
10 and reliability of Toyota vehicles, the Bosses purchased their 2002 Camry and 2009
11 Corolla. Had these brochures, window stickers, warranty information, news reports,
12 or any other materials disclosed that Toyota vehicles could accelerate suddenly and
13 dangerously out of the driver's control and lacked a fail-safe mechanism to
14 overcome this, the Bosses would not have purchased their 2002 Camry and 2009
15 Corolla, or would not have paid as much for them, and suffered depreciation in value
16 due to the existence of the defects.

17 71. Plaintiffs Rich and Jan Bowling are residents of Maryland. They own a
18 2005 Toyota Avalon. While Mrs. Bowling was pulling into a parking spot with her
19 husband, the car suddenly accelerated. The car hit an iron railing and some steps,
20 causing five thousand dollars in damage to the car. The Bowlings had the car
21 inspected, but Toyota said the collision was caused by driver error. The Bowlings
22 saw advertisements for Toyota vehicles on television, in magazines, on billboards, in
23 newspapers, and in brochures at the dealership for a few months before they
24 purchased their Avalon. Although they do not recall the specifics of the many
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1 Toyota advertisements they saw before they purchased their Avalon, they do recall
2 that safety and reliability were consistent themes across the advertisements they saw.
3 The Bowlings specifically remember Toyota advertising that their cars were still on
4 the road after several years. These representations about safety and reliability
5 influenced their decision to purchase their Avalon. Had those advertisements or any
6 other materials disclosed that Toyota vehicles could accelerate suddenly and
7 dangerously out of the driver's control and lacked a fail-safe mechanism to
8 overcome this, they probably would not have purchased their Avalon, or they
9 certainly would not have paid as much for it, and suffered depreciation in value due
10 to the existence of the defects.
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12
13 72. Plaintiff Brandon Bowron is a resident and citizen of Arizona. He
14 owned a 2007 Lexus IS 350. He sold his Lexus on July 7, 2010. Mr. Bowron
15 received less value for the car due to the SUA defect. Mr. Bowron saw
16 advertisements for Toyota vehicles on television, in magazines, on billboards, in
17 brochures at the dealership, and on the Internet during the six to eight months before
18 he purchased his Lexus IS 350. Although he does not recall the specifics of the
19 many Toyota advertisements he saw before he purchased his IS 350, he recalls that
20 safety and reliability were a consistent theme across the advertisements he saw.
21 Those representations about safety and reliability influenced his decision to purchase
22 his Lexus IS 350. Had those advertisements or any other materials disclosed that
23 Lexus vehicles could accelerate suddenly and dangerously out of the driver's control
24 and lacked a fail-safe mechanism to overcome this, he would not have purchased his
25 Lexus IS 350, or he would not have paid as much for it.
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1 73. Plaintiff Vanessa Bozeman is a resident of West Virginia and owns a
2 2007 Toyota Camry XLE. Ms. Bozeman, an elementary school principal, has
3 experienced multiple SUA events. During the first event, with her parents in the car,
4 the brakes would not respond to stop the vehicle; Ms. Bozeman was able to shift the
5 vehicle into neutral and bring it to a stop to avoid hitting the motorist in front of her.
6 The second SUA incident took place on a busy highway in Barboursville, West
7 Virginia. Again, the vehicle began accelerating and did not respond when
8 Ms. Bozeman applied the brake. Ms. Bozeman shifted the vehicle into neutral and
9 was able to bring the vehicle to a stop. Ms. Bozeman has had both the accelerator
10 pedal and floor mat recall repairs implemented on her vehicle. She has also had the
11 vehicle inspected at a local Toyota dealership multiple times, with no resolution to
12 the problem. *After the dealer performed the recall repairs, Ms. Bozeman*
13 *experienced another SUA event in the summer of 2010* when taking her parents to a
14 doctor – the vehicle again accelerated, did not respond to the brakes, and had to be
15 stopped by putting it in neutral. Ms. Bozeman cannot afford to trade the vehicle due
16 to the diminished value. She saw advertisements for Toyota vehicles on television
17 for years before purchasing her Camry on May 13, 2008. Although she does not
18 recall the specifics of the many Toyota advertisements she saw before she purchased
19 her Camry, she does recall that safety and reliability were consistent themes across
20 the advertisements she saw. Those representations about safety and reliability
21 influenced her decision to purchase her Camry. Had those advertisements or any
22 other materials disclosed that Toyota vehicles could accelerate suddenly and
23 dangerously out of the driver's control and lacked a fail-safe mechanism to
24 overcome this, she would not have purchased her 2007 Camry XLE, or she certainly

1 would not have paid as much for it, and has suffered depreciation in value due to the
2 existence of the defects.

3 74. Plaintiff Ebony Brown is a resident and citizen of Illinois. She owns a
4 2009 Toyota Camry. Ms. Brown saw advertisements for Toyota vehicles on
5 television, in magazines, on billboards, in brochures at the dealership, on the Internet,
6 in newspapers, and on banners in front of the dealership, during the two years before
7 she purchased her Camry on July 26, 2008. Although she does not recall the specifics
8 of the many Toyota advertisements she saw before she purchased her Camry, she does
9 recall that safety and reliability were a consistent theme across the advertisements she
10 saw. Those representations about safety and reliability influenced her decision to
11 purchase her Camry. Had those advertisements or any other materials disclosed that
12 Toyota vehicles could accelerate suddenly and dangerously out of the driver's control
13 and lacked a fail-safe mechanism to overcome this, she would not have purchased her
14 Camry. She certainly would not have paid as much for it.

17 75. Plaintiff Deshawna Carter is a resident of West Virginia and owns a
18 2008 Toyota Camry LE. Ms. Carter has experienced a persistent SUA problem in
19 her Camry; the engine revs high and then pulls back on its own. It does not drive at
20 a steady speed. Ms. Carter has reported this problem frequently to the local Toyota
21 dealership and has had the Camry inspected, but the dealer stated there were no error
22 codes. The issues persisted after Ms. Carter had the recall repairs implemented. She
23 saw advertisements for Toyota vehicles on television during the three years before
24 she purchased her Camry in October 2008. Although she does not recall the specifics
25 of the many Toyota advertisements she saw before she purchased her Camry, she
26 does recall that reliability was a consistent theme across the advertisements she saw.
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1 Those representations about reliability influenced her decision to purchase her
2 Camry. Had those advertisements or any other materials disclosed that Toyota
3 vehicles could accelerate suddenly and dangerously out of the driver's control and
4 lacked a fail-safe mechanism to overcome this, she would not have purchased her
5 Camry, or she certainly would not have paid as much for it, and has suffered
6 depreciation in value due to the existence of the defects.
7

8 76. Plaintiffs David and Arlene Caylor are residents of Arizona. They own
9 a 2002 Toyota Camry. On June 2, 2010, Mrs. Caylor experienced a collision as a
10 result of SUA. Mrs. Caylor was backing out of a parking space when her car rapidly
11 accelerated. She shot back two or three car lengths and hit a parked car. The
12 Caylor's saw advertisements for Toyota vehicles on television, in magazines, on
13 billboards, in brochures at the dealership, and on the Internet, several years before
14 they purchased their Toyota Camry on July 6, 2002. Although they do not recall the
15 specifics of the many Toyota advertisements they saw before they purchased their
16 Camry, they recall that safety and reliability were a consistent theme across the
17 advertisements they saw. Those representations about safety and reliability
18 influenced their decision to purchase their Camry. Had those advertisements or any
19 other materials disclosed that Toyota vehicles could accelerate suddenly and
20 dangerously out of the driver's control and lacked a fail-safe mechanism to
21 overcome this, they would not have purchased their Camry. They certainly would
22 not have paid as much for it.
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25 77. Plaintiff Susan Chambers is a resident and citizen of Iowa. She owns a
26 2005 Toyota Camry. On November 12, 2009, Ms. Chambers experienced a collision
27 as a result of SUA. Ms. Chambers had slowed her vehicle to a near stop to park her
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1 car. Just before she put the car in park, the car suddenly accelerated and slammed
2 into the car parked in front of her. Ms. Chambers had pressed the brake, but it had
3 no effect on the vehicle's speed. Ms. Chambers' Camry had Toyota floor mats that
4 were secured by both clips at the time of the collision. Ms. Chambers called her
5 dealer, which told her to call Toyota's Customer Experience Center. Ms. Chambers
6 called Toyota's Customer Experience Center. Toyota subsequently inspected the
7 vehicle, and on December 1, 2009, Toyota wrote a letter to Ms. Chambers stating
8 there was nothing wrong with the vehicle. During the years before she purchased her
9 Toyota Camry on November 17, 2008, Ms. Chambers saw advertisements for Toyota
10 vehicles on television, in magazines, and on billboards. Furthermore, during the
11 years before she purchased her Toyota Camry, she viewed the news regularly on
12 television, in magazines, and on the Internet. Had these advertisements, news
13 reports, or any other materials disclosed that Toyota vehicles could accelerate
14 suddenly and dangerously out of the driver's control and lacked a fail-safe
15 mechanism to overcome this, she probably would not have purchased her Camry.
16 She certainly would not have paid as much for it.

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20 78. Plaintiff Joseph John Chant is a resident and citizen of Idaho. He owns
21 a 2010 Toyota Camry LE. Mr. Chant saw advertisements for Toyota vehicles on
22 television, in magazines, on billboards, in brochures at the dealership, and on the
23 Internet for at least ten years before he purchased his Camry. Although he does not
24 recall the specifics of the many Toyota advertisements he saw before he purchased
25 his Camry, he recalls that safety and reliability were consistent themes across the
26 advertisements he saw. Those representations about safety and reliability influenced
27 his decision to purchase his Camry. Had those advertisements or any other materials
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1 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
2 driver's control and lacked a fail-safe mechanism to overcome this, he would not
3 have purchased his Camry, or he certainly would not have paid as much for it, and
4 suffered depreciation in value due to the existence of the defects.
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6 79. Plaintiff Demetra Christopher owns a 2006 Toyota Avalon XL and
7 resides in Kentucky. She experienced SUA in her vehicle as she turned the corner at
8 an intersection. After making the turn, the vehicle accelerated on its own, causing
9 her to hit a curb and then a fire hydrant. Ms. Christopher saw advertisements
10 misrepresenting the safety of Toyota vehicles on television, in magazines, and on
11 billboards for years prior purchasing her Avalon in December 2005. She also
12 reviewed the window sticker and warranty information and saw news reports based
13 on Toyota press releases. Based on these representations as to the safety of Toyota
14 vehicles, she purchased her Avalon. Had these advertisements, window sticker,
15 warranty information, news reports, or any other materials disclosed that Toyota
16 vehicles could accelerate suddenly and dangerously out of the driver's control and
17 lacked a fail-safe mechanism to overcome this, Ms. Christopher would not have
18 purchased her Avalon, and/or paid as much for it, and suffered depreciation in value
19 due to the existence of the defects.
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22 80. Plaintiff Maria Cisneros is a resident of Texas. She owned a 2009
23 Toyota Corolla. After purchasing her Corolla, Ms. Cisneros noticed that the engine
24 idled at more than 2000 rpms and that sometimes the idle rate would fluctuate up and
25 down while the car was in park. She also noticed that the engine sometimes "roared"
26 while she was driving it. She took the car to the dealer on multiple occasions, but the
27 problem was never fixed. On April 7, 2009, Ms. Cisneros was driving between 30-35
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1 mph when the vehicle jerked and accelerated to 50-55 mph. She applied the brakes,
2 regained control of the vehicle, and drove to the dealer. The dealer did not find a
3 problem. Ms. Cisneros had a similar experience later April 13, 2009, when the car
4 suddenly accelerated while she was driving 40-45 mph. She was able to regain
5 control after applying the brakes. On August 15, 2009, while exiting a parking lot, the
6 Corolla accelerated and shot out of the parking lot and into traffic. Ms. Cisneros
7 applied the brakes, but was not able to regain control of the Corolla before it collided
8 with a vehicle in oncoming traffic. The Corolla was totaled. Ms. Cisneros suffered
9 economic loss because she overpaid for the defective Corolla and because she would
10 not have purchased it had she known about the SUA defect. Ms. Cisneros saw and
11 heard advertisements for Toyota vehicles on television, in magazines, and on
12 billboards during the several years before she purchased her Toyota Corolla.
13 Although she does not recall the specifics of the many Toyota advertisements she saw
14 and heard before she purchased her Corolla, she does recall that safety and reliability
15 were consistent themes across the advertisements. Those representations about safety
16 and reliability influenced her decision to purchase her Corolla. Had those
17 advertisements or any other materials disclosed that Toyota vehicles could accelerate
18 suddenly and dangerously out of the driver's control and lacked a fail-safe mechanism
19 to overcome this, she would not have purchased it. She has overpaid for her car and
20 suffered depreciation in value due to the existence of the defects.

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24 81. Plaintiff Donna Cramer is a resident of Georgia and owns a 2005
25 Toyota 4Runner. Ms. Cramer experienced SUA while driving with her sister; her
26 vehicle accelerated out of control into a group of mangrove trees before coming to a
27 stop. Ms. Cramer had Toyota inspect the vehicle and filed a complaint with
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1 NHTSA. She saw advertisements for Toyota vehicles on television and on the
2 Internet for approximately ten years before she purchased her 4Runner in February
3 2006. Although she does not recall the specifics of the many Toyota advertisements
4 she saw before she purchased her 4Runner, she does recall that safety and reliability
5 were a consistent theme across the advertisements she saw. Those representations
6 about safety and reliability influenced her decision to purchase her 4Runner. Had
7 those advertisements or any other materials disclosed that Toyota vehicles could
8 accelerate suddenly and dangerously out of the driver's control and lacked a fail-safe
9 mechanism to overcome this, she would not have purchased her 4Runner, or she
10 certainly would not have paid as much for it, and suffered depreciation in value due
11 to the existence of the defects.
12

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14 82. Plaintiff Walter Crigler is a resident and citizen of Arizona. He owned a
15 2008 Toyota Prius. Due to his concerns regarding the Toyota SUA defect,
16 Mr. Crigler traded his Prius in for another vehicle. He incurred a significant loss on
17 the trade. He received less for his trade because of the defects now associated with
18 Toyota vehicles, yet purchased the vehicle because he believed it would have a high
19 resale value. Mr. Crigler saw advertisements for Toyota vehicles on television, in
20 magazines, on billboards, in brochures at the dealership, and on the Internet for
21 several years before he purchased his Prius on December 31, 2007. Although he
22 does not recall the specifics of the many Toyota advertisements he saw before he
23 purchased his Prius, he does recall that safety and reliability were consistent themes
24 across the advertisements he saw. Those representations about safety and reliability
25 influenced his decision to purchase his Prius. Had those advertisements or any other
26 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
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1 out of the driver's control and lacked a fail-safe mechanism to overcome this, he
2 would not have purchased his Prius, or he certainly would not have paid as much for
3 it, and suffered depreciation in value due to the existence of the defects.

4 83. Plaintiff Gary Davis is a resident and citizen of Tennessee, and he owns
5 a 2008 Toyota Camry LE. Mr. Davis purchased his Toyota based on its reputation
6 for safety. Mr. Davis saw advertisements for Toyota vehicles on television, in
7 magazines, on billboards, in brochures at the dealership, and on the Internet for
8 several months, if not years, before he purchased his Camry on January 17, 2008.
9 Although he does not recall the specifics of the many Toyota advertisements he saw
10 before he purchased his Camry, he does recall that safety and reliability were
11 consistent themes across the advertisements he saw. Those representations about
12 safety and reliability influenced his decision to purchase his Camry. Had those
13 advertisements or any other materials disclosed that Toyota vehicles could accelerate
14 suddenly and dangerously out of the driver's control and lacked a fail-safe
15 mechanism to overcome this, he would not have purchased his Camry. He certainly
16 would not have paid as much for it.

17 84. Plaintiff Hal Farrington is a resident and citizen of Massachusetts. He
18 owns a 2009 Toyota Camry. Mr. Farrington has experienced two SUA incidents.
19 On January 21, 2010, he pulled his car into his neighbor's driveway. His car
20 suddenly accelerated, and he hit his neighbor's car. He took the car to the dealer; it
21 did not identify a problem. Two weeks later, he was moving his car closer to his
22 garage door to make room for his wife's car in the driveway, but it accelerated when
23 he took his foot off the brake. He pressed the brake again, but the car did not stop
24 and hit the garage door. The car was towed to the dealer for inspection and repair.

1 Mr. Farrington saw advertisements for Toyota vehicles on television and on the
2 Internet for several months before he purchased his Camry. Although he does not
3 recall the specifics of the many Toyota advertisements he saw before he purchased
4 his Camry on January 5, 2010, he does recall that safety and reliability were
5 consistent themes across the advertisements he saw. Those representations about
6 safety and reliability influenced his decision to purchase his Camry. When he
7 purchased his Camry, he asked the salesman about the “sticky pedal” issue but was
8 told it was no big deal, and that a correction would be issued shortly. Had those
9 advertisements or any other materials disclosed that Toyota vehicles could accelerate
10 suddenly and dangerously out of the driver’s control and lacked a fail-safe
11 mechanism to overcome this, he would not have purchased his Camry, or he
12 certainly would not have paid as much for it, and suffered depreciation in value due
13 to the existence of the defects.
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16 85. Plaintiff Carole Fisher is a resident and citizen of Nevada and owns a
17 2010 Toyota Prius. Ms. Fisher saw advertisements for Toyota vehicles on television
18 for several months before she purchased her Prius on June 6, 2009. Although she
19 does not recall the specifics of the many Toyota advertisements she saw before she
20 purchased her Prius, she does recall that safety and reliability were consistent themes
21 across the advertisements she saw. Those representations about safety and reliability
22 influenced her decision to purchase her Prius. Had those advertisements or any other
23 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
24 out of the driver’s control and lacked a fail-safe mechanism to overcome this, she
25 would not have purchased her Prius. She certainly would not have paid as much for it.
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1 86. Plaintiff Maureen Fitzgerald is a resident and citizen of Michigan. She
2 owns a 2009 Toyota Corolla LE. The first time Ms. Fitzgerald drove the Corolla with
3 the salesman, it accelerated at the corner to turn into a busy four-lane road. She
4 slammed on the brakes and remarked to the salesman that everything felt too “loose.”
5 The salesman told her that she just had to “get used to it.” Class representative
6 Maureen Fitzgerald had the pedal recall repair performed by Metro Toyota on her
7 2009 Toyota Corolla LE on February 8, 2010. Ms. Fitzgerald then experienced a
8 SUA on October 6, 2010. While coasting and looking for a parking spot, the car
9 suddenly accelerated. She applied the brake, but the car did not respond. She
10 swerved into a parking space to avoid hitting a pedestrian and another car. She hit the
11 handicapped bar, and the car stopped so violently that her dog nearly went through the
12 windshield. Ms. Fitzgerald saw advertisements for Toyota vehicles on television, in
13 magazines, on billboards, in brochures at the dealership, and on the Internet for
14 several years before she purchased her Corolla on March 31, 2009. Although she does
15 not recall the specifics of the many Toyota advertisements she saw before she
16 purchased her Corolla, she does recall that safety and/or reliability were consistent
17 themes across the advertisements she saw. Those representations about safety and
18 reliability influenced her decision to purchase her Corolla. Had those advertisements
19 or any other materials disclosed that Toyota vehicles could accelerate suddenly and
20 dangerously out of the driver’s control and lacked a fail-safe mechanism to overcome
21 this, she would not have purchased her Corolla. She certainly would not have paid as
22 much for it.

23
24 87. Plaintiff Ann Fleming-Weaver is a resident and citizen of North
25 Carolina. Ms. Fleming-Weaver owns a 2005 Toyota Avalon and has experienced

1 several SUA incidents. During these incidents, the car suddenly accelerates, forcing
2 Ms. Fleming-Weaver to put the car in neutral to slow down. On one occasion, her
3 car suddenly accelerated in a parking lot, and she was able to slow the car.
4 Ms. Fleming-Weaver then returned home, and when pulling into her driveway, the
5 car suddenly accelerated again, causing her to collide with her garage door. Toyota
6 inspected the car, and the inspector told her there were “serious problems with the
7 car.” Nevertheless, Toyota later informed her the car was not defective and claimed
8 the SUA incidents had been caused by driver error. Ms. Fleming-Weaver saw
9 advertisements for Toyota vehicles on television, in magazines, on billboards, in
10 brochures at the dealership, and on the Internet for several years before she
11 purchased her Avalon. Although she does not recall the specifics of the many
12 Toyota advertisements she saw before she purchased her Avalon, she does recall that
13 safety and reliability were consistent themes across the advertisements she saw.
14 Those representations about safety and reliability influenced her decision to purchase
15 her Avalon. Had those advertisements or any other materials disclosed that Toyota
16 vehicles could accelerate suddenly and dangerously out of the driver’s control and
17 lacked a fail-safe mechanism to overcome this, she would not have purchased her
18 Avalon, or she certainly would not have paid as much for it, and suffered
19 depreciation in value due to the existence of the defects.

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23 88. Plaintiff John Geddis is a resident and citizen of Washington. He owns
24 a 2010 Toyota RAV4. Within a month of his purchase, the news broke about the
25 acceleration issues. Mr. Geddis’s vehicle only has about 600 miles on it, but it sits in
26 the driveway practically unused for fear of a SUA event. When the recall repairs
27 were performed by the dealer, Mr. Geddis told the service person that he wanted to
28

1 be rid of the car and that he wanted all of his money back, but the dealer refused to
2 accept the RAV4. He believes that the value of the vehicle is greatly diminished
3 because of the recall. Mr. Geddis saw advertisements for Toyota vehicles on
4 television, in magazines, in brochures at the dealership, and on the Internet during
5 the six to eight months before he purchased his Toyota RAV4 on October 24, 2009.
6 Although he does not recall the specifics of the many Toyota advertisements he saw
7 before he purchased his RAV4, he recalls that safety and reliability were a consistent
8 theme across the advertisements he saw. Those representations about safety and
9 reliability influenced his decision to purchase his Toyota RAV4. Had those
10 advertisements or any other materials disclosed that Toyota vehicles could accelerate
11 suddenly and dangerously out of the driver's control and lacked a fail-safe
12 mechanism to overcome this, he would not have purchased his RAV4, and he would
13 not have paid as much for it.
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16 89. Plaintiff Susan Gonzalez is a resident and citizen of Arizona. She owns
17 a 2010 Toyota Corolla that she purchased in November 2009. She does not feel safe
18 driving the car. Although she had planned to share the car with her son when she
19 purchased it, she cannot let her 16-year-old son drive the car out of safety concerns.
20 Ms. Gonzalez contacted Toyota's Customer Experience Center about returning the
21 car; they told her to arbitrate. Ms. Gonzalez sought to return the car and arbitrated
22 her claim with the National Center for Dispute Settlement, but lost. She saw
23 advertisements for Toyota vehicles on television, in magazines, on billboards, and in
24 brochures at the dealership for several years before she purchased her Corolla on
25 November 7, 2009. Although she does not recall the specifics of the many Toyota
26 advertisements she saw before she purchased her Corolla, she does recall that safety
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1 and reliability were consistent themes across the advertisements she saw. Those
2 representations about safety and reliability influenced her decision to purchase her
3 Toyota Corolla. Had those advertisements or any other materials disclosed that
4 Toyota vehicles could accelerate suddenly and dangerously out of the driver's
5 control and lacked a fail-safe mechanism to overcome this, she would not have
6 purchased her Corolla. She certainly would not have paid as much for it.
7

8 90. Plaintiff Donald Graham is a resident and citizen of Colorado. He owns
9 a 2007 Toyota Prius. Mr. Graham saw advertisements for Toyota vehicles on
10 television, in magazines, on billboards, in brochures at the dealership, and on the
11 Internet for several years before he purchased his Prius on May 4, 2007. Although he
12 does not recall the specifics of the many Toyota advertisements he saw before he
13 purchased his Prius, he recalls that safety and reliability were a consistent theme
14 across the advertisements he saw. Those representations about safety and reliability
15 influenced his decision to purchase his Prius. Had those advertisements or any other
16 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
17 out of the driver's control and lacked a fail-safe mechanism to overcome this, he
18 would not have purchased his Prius. He certainly would not have paid as much for it.
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21 91. Plaintiff Douglas Guilbert is a resident and citizen of Rhode Island. He
22 owns a 2010 Toyota Camry. Mr. Guilbert saw advertisements misrepresenting the
23 safety of Toyota vehicles on television, the Internet, in brochures, and from
24 salespeople for years before purchasing his Camry in November 2009. Based on
25 these misrepresentations as to the safety of Toyota vehicles, Mr. Guilbert purchased
26 his 2010 Camry. Mr. Guilbert also reviewed the window sticker, warranty
27 information, and news reports based on information provided by Toyota in press
28

1 releases. Had these advertisements, sticker, warranty, news reports, or any other
2 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
3 out of the driver's control and lacked a fail-safe mechanism to overcome this,
4 Mr. Guilbert would not have purchased his 2010 Camry, or would not have paid as
5 much for it, and suffered depreciation in value due to the existence of the defects.
6

7 92. Plaintiff Matthew Heidenreich is a resident and citizen of Ohio and
8 leased a 2010 Toyota Corolla. In spring 2010, he experienced three SUA incidents.
9 The first incident occurred on March 5, 2010, when Mr. Heidenreich was sitting in a
10 bank drive-through. The car was in park when the engine revved twice to 3000 RPM.
11 Both times it returned to idle on its own. The second incident occurred on April 1,
12 2010, while Mr. Heidenreich was at the post office. Mr. Heidenreich put the car in
13 park and got out to drop mail in the box. The engine revved while he was out of the
14 vehicle. He turned the car off, then on again, and the car idled normally. The third
15 incident occurred on April 28, 2010, after Mr. Heidenreich backed the car out of his
16 garage. The car idled at about 2000 RPM. He turned the engine off and back on, the
17 tachometer redlined for three separate starts, and the engine "sounded like it was
18 going to explode." Mr. Heidenreich refuses to drive the vehicle again. All three
19 incidents were after Mr. Heidenreich submitted his vehicle for recall repairs.
20 Mr. Heidenreich asked the dealership to cancel his lease and return his money.
21 Toyota refuses to cancel the lease, but offered to let him trade the car in for another.
22 Because the new car would have cost him more money, he declined. In May 2010,
23 Mr. Heidenreich sold his 2010 Corolla to NHTSA for research and lost money on the
24 sale. Mr. Heidenreich saw advertisements misrepresenting the safety of Toyota
25 vehicles on television, in brochures at the dealership, and on the Internet for years
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1 prior to leasing his Toyota on September 30, 2009. Based on these misrepresentations
2 as to the safety of Toyota vehicles, Mr. Heidenreich leased his 2010 Toyota Corolla.
3 He also reviewed the window sticker, warranty information, and news reports about
4 Toyota, which he understands are based on press releases from Toyota. Had these
5 advertisements, window sticker, warranty, news reports or any other materials
6 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
7 driver's control and lacked a fail-safe mechanism to overcome this, Mr. Heidenreich
8 would not have leased his 2010 Corolla and/or paid as much for it.
9

10 93. Plaintiff Jeremy Henson is a resident and citizen of Oklahoma. He
11 owns a 2006 Toyota Tundra. Mr. Henson saw advertisements for Toyota vehicles on
12 television, in magazines, on billboards, in brochures at the dealership, and on the
13 Internet, for many years before he purchased his Tundra. Although he does not
14 recall the specifics of the many Toyota advertisements he saw before he purchased
15 his Tundra, he recalls that safety and reliability were consistent themes across the
16 advertisements he saw. The safety and reliability representations have been a part of
17 Toyota's advertising for as long as Mr. Henson has known of Toyota. Those
18 representations about safety and reliability influenced his decision to purchase his
19 Tundra. Had those advertisements or any other materials disclosed that Toyota
20 vehicles could accelerate suddenly and dangerously out of the driver's control and
21 lacked a fail-safe mechanism to overcome this, he would not have purchased his
22 Tundra, or he certainly would not have paid as much for it, and suffered depreciation
23 in value due to the existence of the defects.
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27 94. Plaintiff Connie A. Kamphaus is a resident and citizen of Ohio. She was
28 the lessee of a 2009 Toyota Camry and currently is the lessee of a 2010 Toyota

1 Camry. Mrs. Kamphaus's late husband, Thomas Kamphaus, experienced the
2 following SUA incidents with the 2009 Camry: on January 15, 2010, the vehicle
3 accelerated on its own in a parking lot, but he forced the brake down and shifted into
4 the parking gear; on February 9, 2010, the engine revved and the brake appeared to
5 freeze, but he applied the brakes as hard as possible and was able to shift into the
6 parking gear; and on February 10, 2010, he experienced a nearly identical incident to
7 the day before. These last two incidents occurred after the recall repair was
8 performed. The Kamphauses took the vehicle to Performance Toyota after the
9 incidents and were told the problem was fixed. On February 13, 2010, they called
10 Performance Toyota to complain and requested to get out of the remaining lease. The
11 dealership asked them to sign an arbitration agreement and did not provide them with
12 a loaner vehicle. On February 19, 2010, the Kamphauses traded in the 2009 Toyota
13 Camry for the 2010 Toyota Camry. On March 14, 2010, the 2010 Toyota Camry
14 suddenly accelerated in a parking lot and jumped a concrete wheel stop. The
15 Kamphauses called Performance Toyota shortly after this incident. They put the 2010
16 Camry in storage because they were afraid to drive it, and they had to purchase a
17 replacement vehicle. The Kamphauses paid more for their lease than they would have
18 otherwise agreed to pay, but were forced to agree to the lease terms to trade in their
19 2009 Camry that had three SUA incidents. The Kamphauses paid more for their lease
20 of the 2010 Camry than they would have paid, or they would not have leased it at all,
21 if they had known the 2010 Camry also had the SUA defect. The Kamphauses have
22 paid for a good, their Toyota, that has failed its essential purpose. Mrs. Kamphaus saw
23 advertisements misrepresenting the safety of Toyota vehicles on television in
24 magazines and on billboards for years before she leased her Toyotas on June 22, 2008

1 and February 19, 2010. Based on these misrepresentations as to the safety of Toyota
2 vehicles, Mrs. Kamphaus leased her 2009 Camry and 2010 Camry. She also reviewed
3 the window stickers on the vehicles and their warranty information. Had these
4 advertisements, window stickers, warranty information or any other materials
5 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
6 driver's control and lacked a fail-safe mechanism to overcome this, she would not
7 have leased her 2009 Camry and 2010 Camry and/or paid as much for them.

9 95. Plaintiffs Victoria and Barry Karlin are residents and citizens of
10 Colorado. They were the owners of a 2007 Toyota Prius, which was totaled on
11 August 14, 2009, as a result of SUA. Mrs. Karlin was parked with her foot on the
12 brake. She put the transmission in drive, and the car surged forward, crashing
13 through a wooden fence beside her driveway. The car continued downhill, crashed
14 into a tree and was totaled. The floor mat was still hooked in place after the
15 accident. They reported the accident to Toyota, but the car had been disposed of, so
16 Toyota denied the claim of loss. The Karlins suffered economic loss because they
17 were not fully compensated for the value of the Prius. The Karlins saw
18 advertisements for Toyota Prius vehicles on television and reviewed a Prius brochure
19 prior to purchasing their Prius. They also reviewed the window sticker and warranty
20 information. Although they do not recall the specifics of the many Prius
21 advertisements they saw before they purchased their Prius, they do recall that safety
22 and reliability were a consistent theme across the advertisements they saw. Those
23 representations about safety and reliability influenced their decision to purchase their
24 Prius and the previous Toyotas they had owned. Had those advertisements, dealer
25 brochure, window sticker, warranty information, or any other materials disclosed that
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1 Prius vehicles could accelerate suddenly and dangerously out of the driver's control
2 and lacked a fail-safe mechanism to overcome this, they would not have purchased
3 their Prius. They certainly would not have paid as much for it.

4 96. Plaintiffs William and Darlene Kleinfeldt are residents and citizens of
5 Illinois. They own a 2010 Toyota Camry LE. The Kleinfeldts saw advertisements
6 misrepresenting the safety of Toyota vehicles on television and received information
7 from a Toyota dealer during the years prior to purchasing their Toyota on October
8 20, 2009. Based on these misrepresentations as to the safety of Toyota vehicles, the
9 Kleinfeldts purchased their 2010 Camry. They also reviewed the window sticker,
10 warranty information, and news reports based on press releases issued by Toyota.
11 Had these advertisements, window sticker, warranty information, news reports, or
12 any other materials disclosed that Toyota vehicles could accelerate suddenly and
13 dangerously out of the driver's control and lacked a fail-safe mechanism to
14 overcome this, the Kleinfeldts would not have purchased their 2010 Camry or would
15 not have paid as much for it, and suffered depreciation in value due to the existence
16 of the defects.

17 97. Plaintiffs Richard and Elise Kuhner are residents and citizens of
18 Washington. They own a 2006 Toyota Avalon. The Kuhners had the pedal recall
19 performed prior to driving the Avalon to Arizona for vacation. While in Arizona,
20 they were in a large parking lot, traveling approximately eight to ten miles per hour.
21 Mr. Kuhner attempted to slow the car down further because pedestrians were ahead.
22 He pressed the brake hard, twice, but each time the car lurched and then resumed
23 acceleration. Mr. Kuhner then put the car in neutral, slammed on the brake, and the
24 car lurched, made a loud "thunk," and stopped. A dealership in Phoenix inspected
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1 the car, but said there was no defect. Mr. Kuhner filed a complaint with Toyota.
2 The Kuhners saw advertisements for Toyota vehicles on television, in magazines, in
3 brochures at the dealership, on the Internet for approximately two years before they
4 purchased their Toyota Avalon on July 18, 2006. Although they do not recall the
5 specifics of the many Toyota advertisements they saw before they purchased their
6 Avalon, they do recall that safety and reliability were consistent themes across the
7 advertisements they saw. Those representations about safety and reliability
8 influenced their decision to purchase their Avalon. Had those advertisements or any
9 other materials disclosed that Toyota vehicles could accelerate suddenly and
10 dangerously out of the driver's control and lacked a fail-safe mechanism to
11 overcome this, they would not have purchased their Avalon, or they certainly would
12 not have paid as much for it, and suffered depreciation in value due to the existence
13 of the defects.

16 98. Plaintiff Monica Lowe is a resident and citizen of Maryland and owns a
17 2005 Toyota Prius. While driving her son to school, Ms. Lowe's vehicle suddenly
18 accelerated from 60 mph to over 80 mph. Ms. Lowe was able to shift the vehicle
19 into neutral and bring the vehicle to a stop. When she turned the vehicle back on, the
20 engine revved on its own. Toyota inspected the vehicle. Ms. Lowe currently has the
21 vehicle stored at her home, and she is afraid to drive it. She had received the pedal
22 recall prior to the SUA event. She saw advertisements for Toyota vehicles on
23 television during the three years before she purchased her Prius in August 2005.
24 Although she does not recall the specifics of the many Toyota advertisements she
25 saw before she purchased her Prius, she does recall that safety and reliability were a
26 consistent theme across the advertisements she saw. Those representations about
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1 safety and reliability influenced her decision to purchase her Prius. Had those
2 advertisements or any other materials disclosed that Toyota vehicles could accelerate
3 suddenly and dangerously out of the driver's control and lacked a fail-safe
4 mechanism to overcome this, she would not have purchased her Prius, or she
5 certainly would not have paid as much for it, and suffered depreciation in value due
6 to the existence of the defects.
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8 99. Plaintiff Priscilla Manarino-Leggett is a resident and citizen of North
9 Carolina. She owns a 2010 Toyota Avalon. Ms. Manarino-Leggett saw
10 advertisements misrepresenting the safety of Toyota vehicles in *Consumer Reports*,
11 on television, and on the Internet for years before she purchased her Avalon on
12 January 5, 2010. Based on these misrepresentations as to the safety of Toyota
13 vehicles, Mrs. Manarino-Leggett purchased her Avalon. She also reviewed the
14 window sticker, warranty information, and news reports based on press releases
15 issued by Toyota. Had these advertisements, window sticker, warranty information,
16 news reports, or any other materials disclosed that Toyota vehicles could accelerate
17 suddenly and dangerously out of the driver's control and lacked a fail-safe
18 mechanism to overcome this, Mrs. Manarino-Leggett would not have purchased her
19 2010 Toyota Avalon, and/or paid as much for it, and suffered depreciation in value
20 due to the existence of the defects.
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23 100. Plaintiff Patrick Mann is a resident and citizen of Missouri. He owns a
24 2009 Toyota Prius. Mr. Mann saw advertisements for Toyota vehicles on television,
25 in magazines, on billboards, in brochures at the dealership, and on the Internet during
26 the years before he purchased his Prius on May 22, 2009. Although he does not
27 recall the specifics of the many Toyota advertisements he saw before he purchased
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1 his Prius, he does recall that safety and reliability were consistent themes across the
2 advertisements he saw. Those representations about safety and reliability influenced
3 his decision to purchase his Prius. Had those advertisements or any other materials
4 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
5 driver's control and lacked a fail-safe mechanism to overcome this, he would not
6 have purchased his Prius, or he certainly would not have paid as much for it, and
7 suffered depreciation in value due to the existence of the defects.
8

9 101. Plaintiff Katherine Musgrave is a resident and citizen of Maine. She
10 owns a 2006 Toyota Prius. Ms. Musgrave first experienced SUA in a parking lot,
11 but did not have a collision. She then had a second experience when was traveling
12 down a city street when she began slowing to stop at a stop sign. She had slowed
13 from approximately 35 mph to approximately 25 mph when the car accelerated. She
14 was forced to go through the intersection, weave around three different cars, and then
15 go up on the curb. She collided with a utility pole. She tried to brake, but could not
16 stop or slow the car. She spoke to her dealer, who referred her to Toyota's Customer
17 Experience Center, because the dealer said Toyota had told him not to get involved
18 with SUA incidents because Toyota was afraid the dealer would take the side of its
19 customer. After she contacted the Customer Experience Center, a case manager
20 called her back and said she would be the case manager, but despite several phone
21 calls, Ms. Musgrave was never able to reach that person again. Toyota inspected the
22 car, and then sent her a letter saying the car was not defective. Ms. Musgrave asked
23 to see the report, but the inspector said the report was the property of Toyota.
24 Ms. Musgrave saw advertisements for Toyota vehicles on television and in
25 magazines for years before she purchased her Prius. Although she does not recall the
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1 specifics of the many Toyota advertisements she saw before she purchased her Prius,
2 she does recall that safety and reliability were consistent themes across the
3 advertisements she saw. Those representations about safety and reliability
4 influenced her decision to purchase her Prius. Had those advertisements or any other
5 materials disclosed that Toyota vehicles could accelerate suddenly and dangerously
6 out of the driver's control and lacked a fail-safe mechanism to overcome this, she
7 would not have purchased her Prius, or she certainly would not have paid as much
8 for it, and suffered depreciation in value due to the existence of the defects.
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10 102. Plaintiff Robert Navarro is a resident and citizen of Ohio. He owns a
11 2010 Toyota Avalon Limited. Mr. Navarro asked his dealer and the Toyota
12 Customer Experience Center to take the car back, but both the dealer and the
13 representative from Toyota refused. The representative from the Toyota Customer
14 Experience Center directed Mr. Navarro to the National Center for Dispute
15 Settlement ("NCDS") to submit a claim; the NCDS told Mr. Navarro that they could
16 not resolve his type of claim. Mr. Navarro saw advertisements for Toyota vehicles
17 on television, in magazines, on billboards, in brochures at the dealership, and on the
18 Internet for several years before he purchased his Avalon on December 23, 2009.
19 Although he does not recall the specifics of the many Toyota advertisements he saw
20 before he purchased his Avalon, he recalls that safety and reliability were consistent
21 themes across the advertisements he saw. Those representations about safety and/or
22 reliability influenced his decision to purchase his Avalon. Had those advertisements
23 or any other materials disclosed that Toyota vehicles could accelerate suddenly and
24 dangerously out of the driver's control and lacked a fail-safe mechanism to
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1 overcome this, he would not have purchased his Avalon. He certainly would not
2 have paid as much for it.

3 103. Plaintiff Carl Nyquist is a resident and citizen of Nebraska. He owns a
4 2006 Toyota Avalon. Mr. Nyquist twice observed the Avalon's engine, while in
5 park, increase idle speed to redline by itself; he did not apply his foot to the
6 accelerator. After these incidents, he was driving on the interstate with his wife at
7 approximately 75 mph when the Avalon accelerated to 90 mph. He turned the car
8 off and slowed to 75 mph, but then turned the car back on and it again accelerated to
9 90 mph. After turning the car off and on again, the Avalon accelerated normally. He
10 took it to a dealer in Lincoln, Nebraska and a dealer in Scott's Bluff, Nebraska, but
11 both dealers said they found nothing wrong. He contacted Toyota's Customer
12 Experience Center, which also stated there was nothing wrong with the vehicle.
13 Mr. Nyquist filed a complaint with the National Center for Dispute Resolution and
14 requested he be allowed to return the Avalon and be provided a replacement car, but
15 the arbitrator denied his claim. Mr. Nyquist saw advertisements for Toyota vehicles
16 on television, in magazines, on billboards, in brochures at the dealership, and on the
17 Internet during the ten years before he purchased his Toyota Avalon on or about
18 December 6, 2007. Although he does not recall the specifics of the many Toyota
19 advertisements he saw before he purchased his Avalon, he recalls that safety and
20 reliability were consistent themes across the advertisements he saw. Those
21 representations about safety and reliability influenced his decision to purchase his
22 Avalon. Had those advertisements or any other materials disclosed that Toyota
23 vehicles could accelerate suddenly and dangerously out of the driver's control and
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1 lacked a fail-safe mechanism to overcome this, he probably would not have
2 purchased his Avalon. He certainly would not have paid as much for it.

3 104. Plaintiff Alyson L. Oliver is a resident and citizen of Michigan. She
4 owns a 2007 Toyota Prius. Ms. Oliver saw advertisements for Toyota vehicles on
5 the television and internet, including on Toyota's website, during the approximately
6 two to four months during which she researched various vehicles before she
7 purchased her Prius in 2007. Although she does not recall the specifics of many of
8 the Toyota advertisements she saw before she purchased her 2007 Toyota Prius, she
9 does recall that Toyota promoted its vehicles as safe and reliable. Those
10 representations about safety and reliability influenced her decision to purchase her
11 Prius. Had those advertisements or any other materials disclosed that Toyota
12 vehicles could accelerate suddenly and dangerously out of the driver's control and
13 lacked a fail-safe mechanism to overcome this, she would not have purchased her
14 Prius, or she certainly would not have paid as much for it, and suffered depreciation
15 in value due to the existence of the defects.

16 105. Plaintiff Karen Pedigo is a resident and citizen of Illinois. She owned a
17 2005 Toyota Camry. While taking her daughter to church, Ms. Pedigo was looking
18 for street parking. She had her foot off the gas and was pulling into a parallel space
19 when the car suddenly accelerated. The sudden acceleration caused her car to hit a
20 minivan. The car then recoiled and hit the minivan a second time. Ms. Pedigo called
21 Toyota's Customer Experience Center, but they stated there was nothing they could
22 do to help her. Due to the SUA, Ms. Pedigo sold her Camry and took a loss on the
23 vehicle. Ms. Pedigo saw advertisements for Toyota vehicles on television and in
24 magazines for several years before she obtained her Toyota Camry in 2005.

1 Although she does not recall the specifics of the many Toyota advertisements she
2 saw before she purchased her Camry, she does recall that safety and reliability were
3 consistent themes across the advertisements she saw. Those representations about
4 safety and reliability influenced her decision to purchase her Camry. Had those
5 advertisements or any other materials disclosed that Toyota vehicles could accelerate
6 suddenly and dangerously out of the driver's control and lacked a fail-safe
7 mechanism to overcome this, she would not have selected a Camry, or she certainly
8 would not have paid as much for it, and suffered depreciation in value due to the
9 existence of the defects.
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11 106. Plaintiff Roland Pippin is a resident and citizen of Louisiana. He owns
12 a 2009 Toyota Camry. Dr. Pippin purchased his Camry on October 17, 2009, only
13 days before the first of several recalls affecting his vehicle. This was the fourth
14 Toyota vehicle, and the third Camry, that Dr. Pippin had purchased since 1994.
15 Before each purchase, Dr. Pippin performed exhaustive research on the attributes of
16 various vehicles. During an approximate three-month period in which he
17 investigated and researched vehicles before purchase of his 2009 Camry, Dr. Pippin
18 saw advertisements for Toyota vehicles in brochures at Toyota dealerships and on
19 the Internet, including Toyota's website. Safety and reliability were consistent
20 themes across these advertisements. Toyota's representations of safety and
21 reliability influenced his decision to purchase the Camry. Had those advertisements
22 or any other materials disclosed that the Camry could accelerate suddenly and
23 dangerously out of control and lacked a failsafe mechanism to overcome this,
24 Dr. Pippin would not have purchased the vehicle. He certainly would not have paid
25 as much for it. Safety and reliability, along with fuel efficiency, are the most
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1 important factors in any vehicle Dr. Pippin purchases. Upon notification that his
2 vehicle was subject to recall, Dr. Pippin communicated a number of times with the
3 dealer from whom he bought the vehicle, as well as Toyota. No satisfaction was
4 given to any of Dr. Pippin's concerns. Dr. Pippin was so concerned about the safety
5 of his Camry after the recall that he parked his vehicle and did not drive it for eight
6 months, and suffered depreciation in value due to the existence of the defects.
7

8 107. Plaintiffs Bianca and Steven Prade are residents and citizens of
9 Virginia. They own a 2009 Toyota Camry XLE. Mr. Prade is a police officer for the
10 District of Columbia. On February 2, 2010, he experienced SUA when he attempted
11 to park the Camry in the garage at the Prades' home, causing damage to both the
12 garage and the vehicle's driver-side door. The Prades saw advertisements
13 misrepresenting the safety of Toyota vehicles on television for years prior to
14 purchasing their Camry on July 23, 2008. Based on these misrepresentations as to
15 the safety of Toyota vehicles, Mr. and Mrs. Prade purchased their 2009 Camry.
16 They also reviewed the window sticker, warranty information, and news reports
17 based on press releases issued by Toyota. Had these advertisements, window sticker,
18 warranty information, news reports or any other materials disclosed that Toyota
19 vehicles could accelerate suddenly and dangerously out of the driver's control and
20 lacked a fail-safe mechanism to overcome this, the Prades would not have purchased
21 their 2009 Camry and/or paid as much for it.
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24 108. Plaintiff George D. Radmall is a resident and citizen of Kansas. He
25 owns a 2007 Toyota Camry. On June 6, 2009, Mr. Radmall was parked in a parking
26 lot. He started the car, and with his foot on the brake, shifted into reverse. The car
27 suddenly accelerated in reverse, and Mr. Radmall was unable to stop the car by
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1 applying the brake. The car slammed into another car in the parking lot. On May 1,
2 2010, Mr. Radmall was pulling into a parking spot with his foot on the brake. When
3 he applied pressure to the brake to stop the car, the car accelerated. Mr. Radmall
4 pushed on the brake with both feet, but hit a storm drain cover (a large block of
5 concrete). On May 24, 2010, Mr. Radmall was turning into a parking spot, but had
6 to stop and put the car in reverse in order to align the car properly with the spot.
7 After he put the car in reverse, the engine revved loudly as though the throttle was
8 wide open, but the brakes stopped the car. Mr. Radmall released the brake after
9 shifting into drive, and the car lunged forward and hit a car and a cement block. He
10 sold the Camry in July 2010, and received less for the sale than he otherwise would
11 have but for the defect. Mr. Radmall saw advertisements for Toyota vehicles on
12 television, in magazines, on billboards, in brochures at the dealership, and on the
13 Internet during the years before he purchased his Toyota Camry on September 18,
14 2007. Although he does not recall the specifics of the many Toyota advertisements
15 he saw before he purchased his Camry, he does recall that safety and reliability were
16 consistent themes across the advertisements he saw. Those representations about
17 safety and reliability influenced his decision to purchase his Camry. Had those
18 advertisements or any other materials disclosed that Toyota vehicles could accelerate
19 suddenly and dangerously out of the driver's control and lacked a fail-safe
20 mechanism to overcome this, he would not have purchased his Camry, or he
21 certainly would not have paid as much for it, and suffered depreciation in value due
22 to the existence of the defects.

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27 109. Plaintiff Randee Romaner is a resident and citizen of New Jersey. She
28 leased and then purchased a 2007 Toyota Camry. Ms. Romaner lives in a rural part

1 of New Jersey where there is no public transportation, so she relies heavily on her
2 Camry. She saw advertisements for Toyota vehicles on television, in magazines, on
3 billboards, in brochures at the dealership, and on the Internet, for several months
4 before she leased and then purchased her Camry. Although she does not recall the
5 specifics of the many Toyota advertisements she saw before she purchased her
6 Camry, she recalls that safety and reliability were consistent themes across the
7 advertisements she saw. Those representations about safety and reliability influenced
8 her decision to purchase her Camry. Had those advertisements or any other materials
9 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
10 driver's control and lacked a fail-safe mechanism to overcome this, she would not
11 have leased her Camry, or she certainly would not have paid as much for it, and
12 suffered depreciation in value due to the existence of the defects.
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15 110. Plaintiff Barbara J. Saunders is a resident and citizen of Ohio. She
16 owned a 2006 Toyota Avalon and owns a 2009 Toyota Matrix. On May 3, 2008,
17 Ms. Saunders experienced a collision as a result of SUA in her 2006 Toyota Avalon,
18 causing her to lose control of her vehicle and skid into a guardrail and concrete
19 divider. The Avalon was totaled. On February 2, 2009, Ms. Saunders experienced a
20 collision as a result of SUA in her 2009 Toyota Matrix, causing her to rear-end a
21 pick-up truck. On March 11, 2010, Ms. Saunders experienced a second SUA
22 incident in her 2009 Toyota Matrix. The value of her Toyota Matrix has diminished
23 as a result of the SUA defect. Ms. Saunders saw advertisements misrepresenting the
24 safety of Toyota vehicles on television and through direct mail and emails from
25 Toyota during the years prior to when she purchased her Toyotas in August 2006 and
26 on May 23, 2008. Based on these misrepresentations as to the safety and reliability
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1 of Toyotas, Ms. Saunders purchased her 2006 Avalon and 2009 Matrix.
2 Ms. Saunders also reviewed the window stickers, warranty information, and news
3 reports based in press releases issued by Toyota. Had these advertisements, window
4 stickers, warranty information, news reports, or any other materials disclosed that
5 Toyota vehicles could accelerate suddenly and dangerously out of the driver's
6 control and lacked a fail-safe mechanism to overcome this, Ms. Saunders would not
7 have purchased her 2006 Avalon and 2009 Matrix and/or paid as much for them.
8

9 111. Plaintiff Keith Sealing is a resident and citizen of Pennsylvania. He
10 leases a 2009 Toyota Corolla and is a dean of Widener Law School. Dean Sealing
11 explored ending his lease early, but the market value had dropped so much due to the
12 defect that it was worth less than the remaining lease buy-out. He would have had to
13 pay out cash or else go into negative equity on a trade, so he was forced to keep it.
14 Dean Sealing saw advertisements for Toyota vehicles on television, in magazines, on
15 billboards, in brochures at the dealership, and on the Internet for at least ten years
16 before he leased his Corolla on May 28, 2008. Although he does not recall the
17 specifics of the many Toyota advertisements he saw before he purchased his Corolla,
18 he recalls that safety and reliability were consistent themes across the advertisements
19 he saw. Those representations about safety and reliability influenced his decision to
20 purchase his Corolla. Had those advertisements or any other materials disclosed that
21 Toyota vehicles could accelerate suddenly and dangerously out of the driver's
22 control and lacked a fail-safe mechanism to overcome this, he would not have leased
23 his Corolla, or he certainly would not have paid as much for it, and suffered
24 depreciation in value due to the existence of the defects.
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1 112. Plaintiff Nancy Seamons is a resident and citizen of Utah. She owns
2 a 2009 Toyota RAV4. She spoke to her dealer about her concerns, but was brushed
3 off. She saw advertisements for Toyota vehicles on television, in magazines, on
4 billboards, in brochures at the dealership, and on the Internet for at least ten years
5 before she purchased her RAV4. Although she does not recall the specifics of the
6 many Toyota advertisements she saw before she purchased her RAV4, she recalls
7 that safety and reliability were consistent themes across the advertisements she saw.
8 Those representations about safety and reliability influenced her decision to purchase
9 her RAV4 at the end of 2009. Had those advertisements or any other materials
10 disclosed that Toyota vehicles could accelerate suddenly and dangerously out of the
11 driver's control and lacked a fail-safe mechanism to overcome this, she would not
12 have purchased her RAV4, or she certainly would not have paid as much for it, and
13 suffered depreciation in value due to the existence of the defects.
14

15 113. Plaintiff Richard Swalm is a resident and citizen of South Carolina.
16 Mr. Swalm leases a 2007 Toyota Camry LE. Mr. Swalm and his wife have
17 experienced multiple instances of the vehicle hesitating, then lunging forward.
18 These problems began after the first week of his lease. He has taken the vehicle
19 several times to his local dealership, which informed Mr. Swalm the problem was
20 "just a glitch" in the computer, but the problem still occurs. Mr. Swalm pursued
21 arbitration in late February/early March of 2010 to terminate his lease on the vehicle,
22 but the arbitrator ruled against Mr. Swalm. He saw advertisements for Toyota
23 vehicles on television approximately one to two years before he leased his Camry on
24 March 3, 2007. Although he does not recall the specifics of the many Toyota
25 advertisements he saw before he leased his 2007 Toyota Camry LE, he does recall
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1 that safety and reliability were consistent themes across the advertisements he saw.
2 Those representations about safety and reliability influenced his decision to purchase
3 his Camry. Had those advertisements or any other materials disclosed that Toyota
4 vehicles could accelerate suddenly and dangerously out of the driver's control and
5 lacked a fail-safe mechanism to overcome this, he would not have leased his 2007
6 Toyota Camry LE, or he certainly would not have paid as much for it, and suffered
7 depreciation in value due to the existence of the defects.
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9 114. Plaintiff Jane Taylor is a resident and citizen of Hawaii. She owns a
10 2005 Toyota Prius. She saw advertisements for Toyota vehicles on television, in
11 magazines, in brochures at the dealership, and on the Internet for months prior to
12 purchasing her Prius. Although she does not recall the specifics of the many Toyota
13 advertisements she saw before she purchased her 2005 Prius, she recalls that safety
14 and reliability were consistent themes across the advertisements she saw. Had those
15 advertisements or any other materials disclosed that Toyota vehicles could accelerate
16 suddenly and dangerously out of the driver's control and lacked a fail-safe
17 mechanism to overcome this, she would not have purchased the Prius, or she
18 certainly would not have paid as much for it, and suffered depreciation in value due
19 to the existence of the defects.
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22 115. Plaintiff Frank Visconi is a resident and citizen of Tennessee. He was
23 the owner of a 2007 Toyota Tacoma, which was totaled when Mr. Visconi
24 experienced a SUA collision on June 8, 2007. After Mr. Visconi tapped his brakes
25 to slow down on the highway, the engine accelerated to 7000-8000 RPMs, spinning
26 the vehicle out of control. The vehicle drove into an embankment, started to flip
27 over and was airborne for 35-40 feet. The vehicle then landed on its roof and rolled
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1 another three times before stopping. In addition to the SUA collision, Mr. Visconi
2 also experienced the following SUA incidents: on February 9, 2007, his vehicle
3 lurched forward from a stop; on February 12, 2007, his vehicle suddenly accelerated
4 while he was stopped with his foot on the brakes – his rear wheels were spinning
5 uncontrollably and his engine was making loud noises; on April 24, 2007, his vehicle
6 suddenly accelerated while he was braking to slow down on a highway entrance
7 ramp; and on May 23, 2007, his vehicle suddenly accelerated while he was braking
8 to slow down on a downhill. Mr. Visconi took his Tacoma to the dealership twice
9 and was told nothing could be done if they could not replicate the incident.
10
11 Mr. Visconi talked to the Toyota regional sales manager and asked him to repurchase
12 the vehicle; the manager refused. Mr. Visconi saw advertisements for Toyota
13 vehicles on television, in magazines, on billboards, in brochures at the dealership,
14 and on the Internet during the years before he purchased his 2007 Toyota Tacoma in
15 October 2006. Although he does not recall the specifics of the many Toyota
16 advertisements he saw before he purchased his Tacoma, he does recall that safety
17 and reliability were a consistent theme across the advertisements he saw. Those
18 representations about safety and reliability influenced his decision to purchase his
19 Tacoma. Had those advertisements or any other materials disclosed that Toyota
20 vehicles could accelerate suddenly and dangerously out of the driver's control and
21 lacked a fail-safe mechanism to overcome this, he would not have purchased his
22 Tacoma. He certainly would not have paid as much for it.

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25 116. Plaintiff Shirley Ward is a resident of Virginia. She owned a 2005
26 Lexus ES 330. On April 2, 2010, Ms. Ward experienced a collision as a result of
27 SUA when her car accelerated while she was attempting to park at her condominium
28

1 complex. The vehicle suddenly took off, going over the curb and into a cinder-block
2 wall. After impact, the tires continued to spin and the engine continued to rev even
3 though Ms. Ward had both feet on the brake. When she put the vehicle into reverse,
4 the engine went back to normal. Ms. Ward traded in her ES 330 and received
5 substantially less value than she would have received if the vehicle did not have the
6 SUA defect. Ms. Ward saw advertisements for Lexus vehicles on television, in
7 magazines, in newspapers, and on billboards before she purchased her first Lexus in
8 1999 or 2000. She continued to see Lexus advertisements up until the time she
9 purchased her ES 330 in January 2010. Although she does not recall the specifics of
10 the many Lexus advertisements she saw before she purchased her ES 330, she does
11 recall that safety and reliability were consistent themes across the advertisements she
12 saw. Those representations about safety and reliability influenced her decision to
13 purchase her ES 330. Had those advertisements or any other materials disclosed that
14 Lexus vehicles could accelerate suddenly and dangerously out of the driver's control
15 and lacked a fail-safe mechanism to overcome this, she would not have purchased
16 her ES 330, and suffered depreciation in value due to the existence of the defects.

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20 117. Plaintiff Ted M. Wedul is a resident and citizen of Wisconsin. He owns
21 a 2010 Toyota Prius. Mr. Wedul saw advertisements for Toyota vehicles on
22 television, on the Internet, and in magazines during the months before he purchased
23 his Prius in August 2009. Although he does not recall the specifics of many of the
24 Toyota advertisements he saw before he purchased his Prius, he does recall that
25 safety and reliability were consistent themes across the advertisements he saw. Mr.
26 Wedul recalls Toyota advertising suggesting that its vehicles had the highest ratings
27 in crash tests and were among the safest vehicles on the road today. Mr. Wedul
28

1 researched the safety of various vehicles extensively before he made his decision to
2 purchase a Toyota Prius. Toyota's representations about safety and reliability
3 influenced his decision to purchase his Prius. Had Toyota's advertisements or any
4 other materials disclosed that Toyota vehicles could accelerate suddenly and
5 dangerously out of the driver's control and lacked a fail-safe mechanism to
6 overcome this, he would not have purchased his Prius, or would not have paid as
7 much for it, and suffered depreciation in value due to the existence of the defects.
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9 118. Plaintiffs Dana C. and Douglas W. Weller are residents and citizens of
10 Washington. They were the owners of a 2009 Toyota RAV4 that they sold on
11 March 13, 2010. They were unwilling to drive the RAV4 with children in the car
12 due to the SUA defect. The Wellers received less for their trade-in vehicle than they
13 would have had their RAV4 not had a SUA defect. They saw advertisements for
14 Toyota vehicles on television, in magazines, on billboards, in brochures at the
15 dealership, and on the Internet for years, especially during the period while they were
16 researching new cars, before they purchased the Toyota RAV4. Although they do
17 not recall the specifics of the many Toyota advertisements they saw before they
18 purchased the RAV4, they do recall that safety and reliability were a consistent
19 theme across the advertisements they saw. Those representations about safety and
20 reliability influenced their decision to purchase the RAV4. Had those
21 advertisements or any other materials disclosed that Toyota vehicles could accelerate
22 suddenly and dangerously out of the driver's control and lacked a fail-safe
23 mechanism to overcome this, they would not have purchased the RAV4. They
24 overpaid for their vehicle given the defects it had.
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1 119. Plaintiff Georgeann Whelan is a resident and citizen of Maryland. She
2 owned a 2005 Toyota Avalon. She experienced SUA several times at intersections,
3 when her car seemed to hesitate after stopping and then accelerate. While driving
4 with her adult daughter in a parking lot, driving less than 5 mph, Ms. Whelan heard
5 the engine roar and the car rapidly accelerated for approximately two parking lot
6 spaces into a Chevrolet Suburban. She checked the floor mat after the incident, and
7 it was in place. Ms. Whelan requested Toyota buy her vehicle back and wrote a
8 letter to Toyota Motor Sales. Ms. Whelan is generally aware that Toyota has a
9 reputation for reliability and safety from reading publications such as *Consumer*
10 *Reports*. She also reviewed the advertising booklet from the dealer before
11 purchasing her Avalon, which made representations about safety and reliability,
12 including, “The Avalon not only takes care of all your indulgences, but your safety
13 as well....So you can truly enjoy your ride from the standpoint of luxury and
14 safety.... A standard of luxury exceeded only by a standard of safety.” She
15 reviewed the window sticker of her vehicle prior to her purchase, and reviews news
16 reports regularly. Had these advertisements or any other materials disclosed that
17 Toyota vehicles could accelerate suddenly and dangerously out of the driver’s
18 control and lacked a fail-safe mechanism to overcome this, she would not have
19 purchased her Toyota Avalon, or would not have paid as much for it, and suffered
20 depreciation in value due to the existence of the defects.

21 120. Plaintiff Richard Wolf is a resident and citizen of Nevada. He and his
22 son own a 2006 Toyota Tacoma (Mr. Wolf is the co-signer on the loan), and he owns
23 a 2006 RAV4. Both vehicles have experienced SUA events. Mr. Wolf’s son and his
24 daughter-in-law have been involved in collisions caused by SUA while driving the

1 Tacoma. Mr. Wolf's wife has experienced throttle issues and acceleration while
2 driving the RAV4. Mr. Wolf has retained both vehicles, and has had them inspected
3 by Toyota. He saw advertisements for Toyota vehicles on television, in magazines,
4 on billboards, in brochures at the dealership, and on the Internet, for years before he
5 purchased his 2006 Toyota Tacoma. Although he does not recall the specifics of the
6 many Toyota advertisements he saw before he purchased his Tacoma, he does recall
7 that safety and reliability were consistent themes across the advertisements he saw.
8 Those representations about safety and reliability influenced his decision to purchase
9 his Tacoma. Had those advertisements or any other materials disclosed that Toyota
10 vehicles could accelerate suddenly and dangerously out of the driver's control and
11 lacked a fail-safe mechanism to overcome this, he would not have purchased his
12 Tacoma, or he certainly would not have paid as much for it, and suffered
13 depreciation in value due to the existence of the defects.

16 121. Plaintiff Carole R. Young is a resident and citizen of Ohio. She owns a
17 2009 Toyota Corolla. On December 19, 2009, Ms. Young had a collision as a result
18 of SUA when she was approaching a red light. She applied the brakes, but the
19 vehicle only slowed to 15-20 mph and did not stop. Ms. Young had to swerve to
20 avoid a SUV in the intersection and was forced to run the red light. She took her
21 foot off the brake pedal after clearing the intersection, and the Corolla accelerated to
22 50 MPH. She applied pressure on the brake pedal again, and this time the vehicle
23 slowed down. Ms. Young was able to drive home and found that the floor mat was
24 not impeding the accelerator pedal in any way. Ms. Young discussed the incident
25 with her dealership and asked the dealer to get her another vehicle, but the dealer did
26 not help her. She tried to call the Toyota Customer Experience Center but was
27
28

1 unable to reach a representative. Ms. Young saw advertisements for Toyota vehicles
2 on television, in magazines, on billboards, in brochures at the dealership, and on the
3 Internet during the years before she purchased her 2009 Toyota Corolla LE on
4 November 4, 2008. Although she does not recall the specifics of the many Toyota
5 advertisements she saw before she purchased her Corolla, she does recall that safety
6 and reliability were a consistent theme across the advertisements she saw. Those
7 representations about safety and reliability influenced her decision to purchase her
8 Corolla. Had those advertisements or any other materials disclosed that Toyota
9 vehicles could accelerate suddenly and dangerously out of the driver's control and
10 lacked a fail-safe mechanism to overcome this, she would not have purchased her
11 Corolla. She certainly would not have paid as much for it.
12

13
14 122. Each plaintiff suffered injury as they paid more for their vehicles than
15 they should have. A car containing the SUA and fail safe defects is worth less than a
16 car free of such defects. At the time each plaintiff purchased or leased a vehicle each
17 paid a price based on its value free of such defects.
18

19 **D. Defendants**

20 123. Defendant Toyota Motor Corporation ("TMC") is a Japanese
21 corporation. TMC is the parent corporation of Toyota Motor Sales, U.S.A., Inc.
22 TMC, through its various entities, designs, manufactures, markets, distributes and
23 sells Toyota, Lexus and Scion automobiles in California and multiple other locations
24 in the United States and worldwide.
25

26 124. Defendant Toyota Motor Sales, U.S.A., Inc. ("TMS") is incorporated
27 and headquartered in California. TMS is Toyota's U.S. sales and marketing arm,
28 which oversees sales and other operations in 49 states. TMS distributes Toyota,

1 Lexus and Scion vehicles and sells these vehicles through its network of dealers.
2 Money received from the purchase of a Toyota vehicle from a dealer flows from the
3 dealer to TMS. Money received by the dealer from a purchaser can be traced to
4 TMS and TMC.
5

6 125. TMS and TMC sell Toyota vehicles through a network of dealers who
7 are the agents of TMS and TMC.

8 126. TMS and TMC are collectively referred to in this complaint as “Toyota”
9 or the “Toyota Defendants” unless identified as TMS or TMC.

10 127. As used in this complaint, “Toyota Vehicles,” “Defective Vehicles” or
11 “Subject Vehicles” refers to the following models that have ETCS:
12

13 **Toyota Vehicles**

14	2001 – 2010	4Runner
15	2005 – 2010	Avalon
16	2002 – 2010	Camry
17	2007 – 2010	Camry HV
18	2003 – 2005	Celica (2ZZ-GE Engine)
19	2005 – 2010	Corolla (1ZZ-FE, 2AZ-FE, 2ZR-FE)
20	2007 – 2010	FJ Cruiser
21	2004 – 2010	Highlander
22	2006 – 2010	Highlander HV
23	1998 – 2010	Land Cruiser
24	2005 – 2010	Matrix (2AZ-FE, 2ZR-FE, 1ZZ-FE (Not 4WD))
25	2001 – 2010	Prius
26	2004 – 2010	Rav4

1	2001 – 2010	Sequoia
2	2004 – 2010	Sienna
3	2002 – 2008	Solara
4	2003 – 2004	Tacoma (5VZ-FE except Sport Model)
5	2005 – 2010	Tacoma
6	2000 – 2010	Tundra (not including the 2000-2002 with 5VZ-FE)
7	2009 – 2010	Venza
8	2004 – 2010	Yaris

Lexus Vehicles

11	2002 – 2003	ES300
12	2004 – 2006	ES330
13	2007 – 2010	ES350
14	1998 – 2006	GS300
15	2007 – 2010	GS350
16	1998 – 2000	GS400
17	2001 – 2007	GS430
18	2007 – 2010	GS450h
19	2008 – 2010	GS460
20	2003 – 2009	GX470
21	2010	HS250h
22	2008 – 2010	IS F
23	2006 – 2010	IS250
24	2010	IS250c
25	2001 – 2005	IS300

1	2006 – 2010	IS350
2	2010	IS350c
3	1999 – 2000	IS400
4	1998	LS400
5	2001 – 2006	LS430
6	2007 – 2010	LS460
7	2008 – 2010	LS600h
8	1998 – 2007	LX470
9	2008 – 2010	LX570
10	2004 – 2006	RX330
11	2007 – 2010	RX350
12	2006 – 2008	RX400h
13	2010	RX450h
14	1998 – 2000	SC300
15	1998 – 2000	SC400
16	2002 – 2010	SC430

Scion Vehicles

17	2005 – 2010	Scion tC
18	2008 – 2010	Scion xB
19	2008 – 2010	Scion xD

IV. FACTUAL BACKGROUND

A. Toyota's Marketing Campaigns Promise Safety and Lead to Consumer Trust in the Toyota Brand

128. Toyota has consistently marketed its vehicles as "safe" and proclaimed that safety is one of its "highest corporate priorities." It has promoted ETCS as providing "stable vehicle control." Examples of such representations follow.

129. Toyota's 1996 Annual Report explained that safety always has been a top priority in each phase of Toyota's research and development. But translating that effort into "overall safety gains" required an "integrated methodology that unifies evaluation criteria for safety throughout development organization." In a 1996 brochure entitled "Toyota and Automotive Safety," Toyota again stated, "[a]t Toyota, we feel that building safe automobiles is the most important thing we can do." Toyota explained this focus on safety is part of its broad philosophy:

The more indispensable automobiles become, the greater they affect society in terms of safety and the environment. We at Toyota are fully aware of our responsibilities in this regard. We do our utmost to minimize our products' environmental impact and work hard to ensure overall safety. This means identifying the causes of any problems, devising workable remedies, and then putting those remedies into action.

130. Toyota's safety promises included its new electronic throttle control system that it began to implement in the late 1990s. When Toyota began installing ETCS in the 1998 Lexus, it announced ETCS as one of the latest developments:

1 The intelligent electric throttle control system (ETCS-i)
2 gives improved acceleration control under all driving
3 conditions. It provides excellent response and stable
4 vehicle control, especially when the road is slippery.
5

6
7 Using ETCS-i the throttle valve opening is controlled by a
8 throttle actuator which is a small electric motor. Under
9 normal road conditions the throttle opens in direct
10 proportion to the accelerator providing maximum response
11 and performance.
12

13
14 However, under slippery road conditions and with the snow
15 mode selected the actuator slows the throttle opening
16 relative to the accelerator to suppress sudden engine output
17 and provide improved acceleration control.
18

19
20 The ETCS-i is controlled by the engine management
21 computer and communicates with the intelligent automatic
22 gear shift and the traction control systems.

23 The release claimed “[t]he safety and security of driver and passenger has always
24 been an absolute priority for Lexus.”

25 131. The Toyota Camry, in which some of the earliest deadly sudden
26 acceleration accidents occurred, was marketed by Toyota as a high quality and safe
27 family vehicle. According to a Toyota press release:
28

1 The fifth-generation Toyota Camry, introduced for 2002,
2 has become the platinum standard in midsize family sedans
3 by offering more of everything sedan buyers want – room,
4 comfort, performance, *safety and value – along with*
5 *award-winning Toyota quality*. “Camry has come to define
6 what a family sedan should be,” said Don Esmond, Toyota
7 Division senior vice president and general manager. “It’s
8 [sic] continuing success in the U.S. stems from the
9 combination of truly unbeatable quality, comfort and value
10 that it provides.” [Emphasis added.]

11
12
13 132. TMS touted safety as a key feature of Lexus vehicles in a 2002 press

14 kit:

15 Raising the Standards on Standard Safety Features.

16 **The Lexus Commitment to Safety**

17 Lexus designs all its new vehicles to provide customers
18 with advanced safety engineering and technology. Lexus
19 also recognizes the driver’s responsibility to operate a
20 vehicle in as safe a manner as possible, and the company
21 has been at the forefront of technology that enhances both
22 passive safety (occupant protection in a collision) and
23 active safety (driving dynamics).
24

25
26
27 **Road-Reading Throttle Control:** Seeking to enhance
28 driving smoothness at every level, Lexus equipped the

1 LS 430 with a system called Intuitive Powertrain Control.
2 Working with the electronic throttle control (drive by
3 wire), the system helps to smooth out acceleration from a
4 standing start by very slightly delaying throttle opening
5 when the driver steps on the accelerator pedal.
6

7 133. TMC highlighted safety as a key quality in a 2003 brochure:

8 **Toyota Next Generation Technology**

9 We are stepping up our safety technology development to
10 ensure that customers can enjoy their vehicles in safety. In
11 addition to “passive” safety technology, Toyota is
12 energetically developing “active” safety systems that
13 prevent collisions. We are working particularly hard to
14 develop advanced safety systems based on our key
15 peripheral monitoring technologies.
16

17 134. In a press kit regarding the 2003 Prius, Toyota proclaimed its bold use
18 of more “drive by wire” (electronic rather than mechanical features), including a
19 drive-by-wire throttle:
20

21 Many of the new technologies used in the Prius – some
22 unique to the car and world firsts – have been made
23 possible by Toyota’s bold move to redefine the vehicle’s
24 power train and electrical architecture. The higher voltages
25 created by the batteries and converter have enabled
26 Toyota’s engineers to equip the Prius with a far larger suite
27 of ‘drive-by wire’ technologies than has previously been
28

1 seen in any production car. Throttle, transmission and
2 braking is [sic] all electronically controlled and free of the
3 traditional mechanical linkages.

4 135. The same brochure lists the new electronic throttle as a safety feature of
5 the car: “Safety ... First car in the world to use ‘by-wire’ technology for throttle,
6 brakes and gearshift simultaneously.” The brochure describes Toyota’s “radical”
7 and “futuristic” adoption of more electronically controlled features in the Prius
8 because of their increased reliability, including:
9

10 By suppressing mechanical and hydraulic links and
11 replacing them with electric and electronic connections it’s
12 possible to achieve shorter activation times. In addition,
13 the communication between all these systems will be
14 faster. “By-wire” also brings advantages in weight
15 reduction and saves precious space that can be used to
16 house other systems...

17
18
19 “By-wire” technology was originally developed for the
20 aerospace industry, where certain mechanisms had to be
21 activated without any hydraulic or mechanical link. The
22 only way to achieve this was through an electronic
23 connection and electric activation. This technology not
24 only saves weight and space, but also provides a more
25 immediate action than hydraulic or mechanical links, with
26 even higher reliability.
27
28

1
2 For this reason, Prius uses more “by-wire” technology than
3 any other car on the road today. Throttle, brakes, shift
4 lever, Traction Control and Vehicle Stability Control Plus
5 use this technology to improve their operation or even to
6 provide improved ergonomics.
7

8 136. In an advertisement appearing in the June 2003 issue of GOOD
9 HOUSEKEEPING, Toyota promised the Sienna had “more safety.”

10 137. In a 2004 press release introducing the new Prius, TMS claimed:
11 Designed to easily accommodate a small family, the 2004
12 Prius is also designed to provide the level of safety a family
13 car buyer demands. Passive safety features include front
14 seatbelts with pre-tensioners and force limiters, 3-point
15 seatbelts for all rear seating positions and two-step dual
16 front airbags (SRS), with driver and passenger side and
17 curtain airbags available as an option.
18
19

20
21 Prius also features a high level of dynamic control, with
22 some features that are not yet available in other midsize
23 cars. The standard anti-lock brake system (ABS) integrates
24 Brake Assist and Electronic Brake Distribution features,
25 which can help apply maximum braking pressure in an
26 emergency stop. Vehicle Stability Control (VSC) is
27 available as an option. The new Hill Acceleration Control
28

1 helps the driver maintain better control on ascents and
2 descents.

3
4 The new Prius uses an electronically controlled “throttle-
5 by-wire” throttle, which provides greater precision than a
6 conventional cable-type throttle setup. A new by-wire shift
7 control replaces the traditional gearshift lever and allows
8 tap-of-the-finger shifting using a small joystick mounted on
9 the dash.
10

11 138. This general promise of safety and specific promise that the new
12 electronic components being installed in Defective Vehicles are more reliable than
13 their mechanical predecessors is a repeated theme in Toyota marketing:
14

- 15 • 2004 Toyota 4Runner press release: “It features a
16 new linkless electronic throttle control system with
17 intelligence (ETCS-i) that helps improve
18 performance and increase fuel economy...*The*
19 *4Runner utilizes the latest technology to deliver a*
20 *high level of occupant safety.*” [Emphasis added.]
- 21 • August 2004 Lexus Press Kit: “Technical
22 innovation is a key element of Lexus’s all-around
23 excellence, *delivering real benefits to owners in*
24 *terms of safety*, performance, comfort and
25 convenience.” [Emphasis added.]
26
27
28

- 1 ● November 2004 GOOD HOUSEKEEPING: “Your
2 destination should always be safety. And [] Toyota
3 SUV’s raise the standard....”
- 4 ● In GOOD HOUSEKEEPING’s November 2004 issue and
5 elsewhere: “Safety First to Last,” an advertisement
6 for RAV4, Sequoia and Land Cruiser.
- 7 ● 2005 Press Release regarding Toyota SUVs:
8 ““Toyota customers have long counted on the brand
9 for the best in performance, quality and durability,’
10 said [Don] Esmond [senior vice president and
11 general manager, Toyota Division]. ‘*They can take*
12 *comfort knowing that driving safety is just as high a*
13 *priority in our full line of SUVs.’” [Emphasis*
14 *added.]*
- 15 ● In GOOD HOUSEKEEPING’s May 2001 issue: “Happy
16 Mother’s Day from the people obsessed with safety,”
17 an advertisement for the Sienna.
- 18 ● In GOOD HOUSEKEEPING’s March 2001 issue, Special
19 Advertising Section: “Serious about safety. Camry
20 utilizes the latest technology to ensure you and yours
21 arrive at your destination safe and sound.” Also,
22 “Value and safety. Part of the Corolla equation has
23 always been high value and high safety.”

1 139. These proclamations of “safety” and “reliability” were false and
2 misleading because they failed to disclose the dangerous SUA defect and fail-safe
3 mechanism defects. Toyota knew or should have known these representations were
4 false and misleading because, as discussed in detail below, Toyota knew there was a
5 significant increase in SUA events in vehicles with electronic throttle controls over
6 vehicles with mechanical throttle controls.
7

8 140. In 2004, TMS issued a brochure that discussed the safety features of the
9 Sienna:

10 A safe place for your children to grow up. Sienna has a
11 proud safety heritage, boasting some of the very best scores
12 in its class on government and insurance industry crash
13 tests. We’ve equipped the 2004 Sienna with even more
14 safety features. [Lists the safety features.]
15

16 141. In 2004, TMS issued a press kit noting that its RAV4 had enhanced
17 safety features:

18 The second-generation model, designed in Southern
19 California by Toyota’s Caltex Design Research and
20 introduced for the 2001 model year, increased Toyota’s
21 share of this growing segment. The 2004 revision is
22 designed to strengthen the brand’s position in the segment
23 that it created, and to give the customer even greater value
24 and enhanced standard safety features.
25
26
27
28

1 “Toyota invented the formula for this segment, and for
2 2004 we’re perfecting it with more of what everyone who
3 buys a small SUV wants – more power, more safety
4 features, more style and more value,” said Don Esmond,
5 Toyota Division senior vice president and general manager.
6 “What’s more RAV4 still holds the ultimate advantage
7 with Toyota quality.”
8

9 142. In a 2005 press release, TMS boasted about its safety in its RAV4,
10 4Runner, Land Cruiser and Sequoia SUVs:

11 “Toyota offers one of the widest selections of SUVs on the
12 market, and we equip every model with the same level of
13 advanced safety technology,” said Don Esmond, senior
14 vice president and general manager, Toyota Division. “By
15 making this technology standard on all our SUV models,
16 Toyota provides the customer with peace of mind when
17 purchasing and when driving.”
18

19
20
21

22
23 “Toyota customers have long counted on the brand for the
24 best in performance, quality and durability,” said Esmond.
25 “They can take comfort knowing that driving safety is just
26 as high a priority in our full line of SUVs.”
27
28

1 143. A 2006 brochure devoted entirely to Toyota's safety efforts
2 acknowledged Toyota's responsibility as a vehicle manufacturer for the safety of its
3 vehicles. The brochure stated that "Toyota is working to reduce traffic accidents,
4 deaths and injuries" because accidents "have an enormous economic impact: lost
5 productivity, medical bills and compensation for victims, physical losses of vehicles
6 and structures and institutional costs (insurance management, police, trial costs, etc.)."
7 The brochure then explained how Toyota pursues what it refers to as "real safety":
8

9 A fundamental component of building safe cars is
10 gathering information and analyzing why accidents occur
11 and what causes injuries. Toyota analyzes data from real
12 accidents that take place all over the world. By analyzing
13 accident data and using simulation, Toyota develops new
14 safety technologies, testing them on actual vehicles before
15 being offered to the public in our product line-up. This is a
16 perpetual cycle through which Toyota seeks to enhance
17 safety technologies and reduce accidents continuously.
18

19 These same messages were echoed in safety brochures used by TMS in 2007. These
20 statements were false and misleading because Toyota had not performed the tests
21 necessary to diagnose, identify and fix the defect causing SUA.
22

23 144. In the 2007 "Camry Owners Warranty Manual," Toyota represented that
24 it builds "vehicles of the highest quality" and "reliability":
25

26 At Toyota, our top priority is always our customers. We
27 know your Toyota is an important part of your life and
28 something you depend on every day. That's why we're

1 dedicated to building products of the highest quality and
2 reliability.

3
4 Our excellent warranty coverage is evidence that we stand
5 behind the quality of our vehicles. We're confident – as
6 you should be – that your Toyota will provide you with
7 many years of enjoyable driving.
8

9
10 * * *

11
12 Our goal is for every Toyota customer to enjoy outstanding
13 quality, dependability and peace of mind throughout their
14 ownership experience.
15

16 145. This warranty language appears in identical text for all Toyota models.
17 The foregoing language was false and misleading because in fact Toyota vehicles
18 were not of the highest quality and reliability but instead were unsafe and unreliable
19 due to the SUA defect and the failure to have an adequate brake-override and other
20 fail-safe mechanisms.
21

22 146. A brochure for the 2007 Camry indicated it was “Brimming with
23 innovative technology” and that the “wheels of progress are attached to a Camry.”
24 Elsewhere the brochure represents that every Camry surrounds the driver in safety.
25

26 147. In 2009, in its brochures, annual reports and other advertisements,
27 Toyota made the following statements:
28

Safety Technology & Quality

To realize the ideal vehicle – a goal we never cease to pursue. We continue to strive for the technology that prevents and minimizes the damage of an accident in any situation. “What causes accidents?” “What can be done to prevent accidents?” “What mitigates the damage of accidents that have occurred?” These are the questions to which we are constantly seeking answers. Our technologies will continue to advance toward the ultimate goal of making a vehicle that is safe for everybody.

Safety Measurements

Aiming for a society with no traffic accidents.

Quality

Based on our philosophy of “Cuter First”, we test and evaluate vehicles in various ways.

Safety Technology

Toyota is aiming to develop safe vehicles and technology based on the “Integrated Safety Management Concept.”

148. Toyota also represented in 2009 that:

Pursuit for Vehicle Safety

1 Toyota has been implementing “safety” measures to help
2 create safer vehicles. Toyota analyzes the causes of the
3 accident and passenger injuries by using various accident
4 investigation data. These accidents are reenacted in
5 various simulations to create counter-plan technologies. In
6 addition, experiments on an actual full-scale vehicle are
7 conducted before launching the vehicle. Afterwards, the
8 effectiveness of the technologies is inspected by assessing
9 any accidents that might occur. We strive to learn from
10 actual accidents to continue to meet industry’s ever higher
11 standards in safety
12
13

14 149. In September 2009, Toyota announced a new marketing campaign that
15 highlights six claims that Toyota has achieved through its philosophy of *kaizen*, or
16 “constant improvement.” Included in the six claims are “Dependability,” “Quality,”
17 “Reliability” and “Safety.”
18

19 150. A 2010 video of Toyota’s Star Safety System includes the following
20 description of Toyota’s standard for vehicle control safety:

21 If a stereo system comes standard on an SUV, shouldn’t a
22 safety system? Introducing Toyota’s Star Safety System
23 TM, a combination of five safety features that comes
24 standard with every one of Toyota’s five SUVs: Vehicle
25 Stability Control, Traction Control, Anti-lock Brakes,
26 Electronic Brake-force Distribution, and Brake Assist. All
27 designed for one purpose: to help keep the driver in
28

1 control of the vehicle at all times. Because when it comes
2 to the well-being of you and your passengers, Toyota has
3 raised the standard.

4 The video is misleading as it does not mention the vehicle recalls, the unintended
5 acceleration defect or the lack of a fail-safe mechanism to override unintended
6 acceleration. Written advertisements also made representations about the Star Safety
7 System as part of an accident avoidance system that “keeps you in control and out of
8 harm’s way.” Toyota knew these representations were false due to the deaths and
9 crashes it was aware of due to SUA and lack of a fail-safe.
10

11 151. In a video released in February 2010, Toyota states:

12 For over 50 years providing you with a safe, reliable and
13 high quality vehicles has been our first priority. In recent
14 days, our company hasn’t been living up to the standards
15 that you have come to expect from us or that we expect
16 from ourselves. That’s why 172,000 Toyota and dealership
17 employees are dedicated to making things right. We have a
18 fix for our recalls. We stopped production so we could
19 focus on our customers’ cars, first. Our technicians are
20 making repairs. We’re working around the clock to ensure
21 we build vehicles of the highest quality, to restore your
22 faith in our company.
23
24

25 The commercial does not mention that the recalls do not explain even a majority of
26 the reports of unintended acceleration.
27
28

152. Also in 2010 Toyota began a television and print advertising campaign promoting “Safety First, Everyone Deserves Safety.”

153. These claims of safety were intended to and did cause individuals to trust the safety of Defective Vehicles and purchase them. As stated in a 1998 Corolla brochure, “Toyota is now one of the most trusted names in the automotive world – one of the few things you can really depend on.” As stated in a 2004 Lexus LS brochure, “[t]he value of owning a Lexus involves much more than just its purchase price. It also includes our well-earned reputation for vehicle dependability, projected low repair costs and high retained value in addition to such intangibles as outstanding customer satisfaction, unparalleled quality, peace of mind and loyalty.” Even Toyota’s logo of three overlapping ovals is meant to convey a trust between the customer and Toyota.⁹

154. Additional examples of Toyota’s pervasive marketing of the safety of the Subject vehicles include:

TOY-MDL00344061	1/1/1999	Lexus brochure, “A well-founded sense of security is vital to a truly satisfying journey.”
TOY-MDL00344414	1/1/2000	Lexus brochure, “It’s hard to experience a perfect moment if you don’t feel confident, safe and secure.”
TOY-MDL00346660	1/1/2001	Lexus SC mailing, “Lexus puts as much innovation in safety as it does in luxury and performance.”
TOY-MDL00351965	1/1/2001	Prius brochure, “Ultimately, nothing is more important than your well-being.”
TOY-MDL00352195	1/1/2001	Tundra brochure, “Occupant protection is a Tundra trait.”
TOY-MDL00351714	1/1/2002	Camry brochure, “it offers...safety features galore.” “Every time we came up with a way to make the new Camry more powerful, more spacious, more stylish, we looked at the other side of the equation: safety.”
TOY-MDL00095234	7/1/2002	Camry ad, “Safe and Sexy”

⁹ See http://www2.toyota.co.jp/en/vision/traditions/nov_dec_04.html.

1	TOY- MDL00349481	1/1/2003	Toyota brochure, "the combination of space and safety is owed to one thing: our obsession with safety." (Spanish)
2	TOY- MDL00346668	1/1/2003	Lexus GS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
3	TOY- MDL00347258	1/1/2003	Camry brochure, "After all, fancy features are of no consequence if you don't feel safe and secure first."
4	TOY- MDL00345648	1/1/2003	Lexus LX brochure, "Lexus believes there are enough things to be concerned with while driving. Your vehicle's dedication to safety shouldn't be one of them."
5	TOY- MDL00346672	1/1/2003	ES mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
6	TOY- MDL00346676	1/1/2003	LX mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
7	TOY- MDL00346684	1/1/2003	IS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
8	TOY- MDL00095617	1/1/2004	Camry brochure, "Packed with peace of mind. Inside the Camry you'll find an abundance of safety features."
9	TOY- MDL00346546	1/1/2004	ES brochure, "Our philosophy on safety? Obviously, you can just never be too prepared."
10	TOY- MDL00095995	8/1/2004	Sienna ad, "Built for safety."
11	TOY- MDL00096056	11/1/2004	4Runner ad, "With ... the Toyota-exclusive Star Safety System, you can take on the biggest adventures of your life and return home to tell about them."
12	TOY- MDL00351206	1/1/2005	Avalon brochure, "the Avalon not only takes care of all of your indulgences, but your safety as well." "A standard of luxury exceeded only by a standard of safety...after all, you can't be too overprotective."
13	TOY- MDL00096053	1/1/2005	4Runner ad, "Even if you get shaken up, Toyota's exclusive Star Safety System will help bring you home in one piece"
14	TOY- MDL00095748	1/1/2005	Highlander ad, "What could be smarter than playing it safe?"
15	TOY- MDL00095968	1/1/2005	Avalon ad, "And with safety, enough is never enough."
16	TOY- MDL00345229	1/1/2005	Lexus LX brochure, "When Lexus refers to the Passionate Pursuit of Perfection, safety is an absolute priority." "The Lexus ownership experience is felt in the peace of mind you get from our well-earned reputation for unparalleled vehicle quality and dependability."
17	TOY- MDL00096026	4/1/2005	Sienna ad, "Sienna helps protect your kids"
18	TOY- MDL00351069	1/1/2006	Camry Brochure, "with the Camry LE, nothing has been overlooked" "when it comes to safety, we're happy to report that Camry's got you covered."
19	TOY- MDL00346645	1/1/2006	SC mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."

1	TOY- MDL00346618	1/1/2006	LS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
2	TOY- MDL00346661	1/1/2006	Avalon brochure, "a standard of luxury exceeded only by a standard of safety" "after all, you can't be too protective"
3	TOY- MDL00096232	12/1/2006	Camry ad, "make sure you are there to see the future"
4	TOY- MDL00346649	1/1/2007	SC mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
5	TOY- MDL00346622	1/1/2007	LX mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
6	TOY- MDL00348026	1/1/2007	Lexus ad, "Actively safe RX"
7	TOY- MDL00096122	1/1/2007	Yaris brochure, "Every Toyota gets put through the ringer when it comes to safety testing."
8	TOY- MDL00346588	1/1/2007	LS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
9	TOY- MDL00346626	1/1/2007	IS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
10	TOY- MDL00346630	1/1/2007	GS mailing, "Lexus puts as much innovation in safety as it does in luxury and performance."
11	TOY- MDL00350635	1/1/2007	Avalon brochure, "Avalon is available with advanced technologies designed to enhance the active safety capability of the car"
12	TOY- MDL00098530	12/11/2007	Camry ad, "It just feels like a very safe car" "I have two daughters and this car has 7 airbags for their safety"
13	TOY- MDL00349795	1/1/2008	Toyota brochure, "every minute of every day millions of people open the door of their Toyota, get in and fasten their seatbelt. The peace of mind they enjoy is the result of Toyota's commitment to safety engineering."
14	TOY- MDL00098617	2/1/2008	Corolla ad, "Corolla loading up on all the features you've wanted but thought you couldn't afford...packing in safety features like side curtain airbags and anti lock brakes."
15	TOY- MDL00098399	5/8/2008	Corolla ad, "with the safety you would expect"
16	TOY- MDL00099830	7/11/2008	Toyota ad, "Defender of the family"
17	TOY- MDL00096247	9/1/2008	Camry ad, "a host of standard safety features to help make sure you're around to see [the future]."
18	TOY- MDL00099049	10/1/2008	Highlander ad, "nothing compares to the 5 star crash test rated Toyota Highlander"
19	TOY- MDL00099524	12/15/2008	Camry ad, "Camry...lives up to its reputation of reliability and safety"
20	TOY- MDL00099556	12/18/2008	Toyota ad, "the safety of your family is that important"
21	TOY- MDL00096892	1/1/2009	Highlander brochure, "When it comes to achieving a high level of active and passive safety engineering, everything counts"

1	TOY- MDL00097034	6/1/2009	Yaris brochure, "There's no such thing as having too many safety features."
2	TOY- MDL00100163	9/25/2009	Tacoma ad, "Toyota Tacoma is truly unstoppable"
3	TOY- MDL00272788	1/1/2010	Toyota ad, "we are confident that no problems exist with the electronics in our vehicles."
4	TOY- MDL00566897	1/1/2010	Toyota ad, "we're not moving forward, until you're safe"
5	TOY- MDL00350279	1/1/2010	Lexus ad, "After all, when it comes to safety, the metal around you isn't nearly as important as the thinking behind it."
6	TOY- MDL00347845	1/1/2010	Sienna ad, "safety first"
7	TOY- MDL00097100	1/1/2010	Toyota ad, "Toyota builds cars you can trust" "Its a reassuring feeling to know you're surrounded by advanced safety technologies and engineering proven to stand the test of time"
8	TOY- MDL00578433	2/3/2010	Toyota ad, "For 50 years, Toyota has been committed to providing you safe, reliable, quality vehicles." "Building safe cars is what we've been doing for fifty years...it's the Toyota way."
9	TOY- MDL00100311	2/27/2010	Toyota ad, "The most important thing for me in a car is safety, that we all have a safe ride." "Particularly for the kids." "Toyota had been and will keep being very reliable."
10	TOY- MDL00350213	5/1/2010	Toyota ad, "SAFE" "Everyone deserves to be safe" "star safety system now standard on every Toyota" "No matter who you are or what you drive, everyone deserves to be safe." "Because at Toyota, we realize that nothing is more important to you than your safety"
11	TOY- MDL00350112	1/1/2011	Toyota brochure, "At Toyota, we believe everyone has the right to be safe... we've also added smart stop technology. Designed to reduce engine power when the brake is firmly applied, this innovative system...it's just another example of our ongoing commitment to build the most trustworthy vehicles on the road."

155. Despite Toyota's proclamations of safety and severe testing regimes, it was also growing rapidly, adding new technology to its vehicles and increasingly unable to live up to its promises.

B. Toyota's Electronic Throttle Control System and Its Limited Fail-Safe Mechanism

156. Toyota calls its electronic throttle control system the ETCS-intelligent, or ETCS-i. ETCS-i activates the throttle utilizing the command from the driver's foot that is conveyed electronically from two position sensors in the accelerator

1 pedal, processed in the engine control computer and then transmitted to the throttle.
2 Toyota began installing ETCS-i in models of the 1998 Lexus. This ETCS included a
3 mechanical link that shut off the throttle.

4 157. In 2001, Toyota began producing the substantially redesigned 2002
5 Camry. It was the first Toyota to be equipped with linkless ETCS-i, which was one
6 of several new or revised vehicle systems (including transmission and braking
7 systems) introduced for 2002 Toyota Camrys, Solaras and the Lexus ES 300 line.
8 Linkless ETCS-i did not have a mechanical link to shut the throttle.
9

10 158. Toyota's earlier ETCS-i equipped vehicles retained a mechanical
11 system that would close the throttle if the electronic system failed. However, Toyota
12 had phased out these mechanical linkages by the time it incorporated ETCS-i into the
13 2002 Camry. Toyota knew other manufacturers continued to use a manual fail-safe
14 mechanism. For example, Toyota knew Audi had a system that mechanically closed
15 the throttle when the brakes were applied.¹⁰
16

17 159. In order to address potential malfunctions of the ETCS-i – in other
18 words, instances where the control strategy of the vehicle has become compromised –
19 all ETCS employ the same four fail-safe strategies. The fail-safe strategies are:
20

- 21 a. If the engine throttle plate is physically stuck in a
22 position different from that corresponding to the
23 accelerator position, or the engine control computer
24 fails, the engine's fuel supply should cut off and
25 result in an engine stall;
26

27
28 ¹⁰ TOY-MDLID00041130T-0001.

- b. The “single-point” failure of one accelerator pedal position sensor is intended to result in a 70% to 75% reduction in throttle capacity;
- c. The “double-point” failure of both accelerator pedal position sensors should close the throttle to idle; and
- d. If one or both throttle position sensors fail, or the throttle itself is not responding properly to the accelerator pedal but the throttle itself is not physically stuck, the throttle should close but will provide minimal acceleration.

160. As explained herein, Toyota knew no later than 2002 that these fail-safes were insufficient to prevent SUA events in its vehicles and that additional fail-safes were necessary. Toyota did not, however, move to address these issues by installing additional fail-safes.

161. Toyota had several options. For example, Toyota could have installed a software subroutine that cuts the throttle when the brake pedal is depressed, which would mitigate many of the failure mechanisms causing SUA. Or, Toyota could have employed a hardware-redundant, fault tolerant solution (BMW’s approach). Or, Toyota could have provided an override of the engine control module, such as a key switch to physically remove the power to the Engine Control Module (“ECM”). Or, Toyota could have installed a multiple-redundant cross-check ECM or a bus traffic cross-check system. Toyota did none of these things.

162. In 2007, recognizing the risks of unintended acceleration, “TMS suggested that there should be ‘a fail safe option similar to that used by other

1 companies to prevent unintended acceleration.”¹¹ Toyota did not act on this
2 suggestion until 2010.

3 **C. Toyota Receives Complaints and Is Investigated for Unintended**
4 **Accelerations Beginning in 2002**

5 163. Toyota had advance notice of a defect and safety risks involving SUA in
6 ETCS-i equipped vehicles as early as 2002. Toyota hid this notice from the public
7 through calculated manipulation of information supplied to NHTSA during its
8 various investigations of SUA incidents. Toyota exploited strategic relationships
9 with current and former NHTSA employees and negotiated “deals that limited the
10 nature and scope of NHTSA’s investigations.” Toyota knew that these limited
11 investigations were unlikely to reveal a defect in the ETCS and did everything it
12 could to keep it that way.
13

14 **1. First reports of unintended acceleration to Toyota**

15 164. On February 2, 2002, Toyota received its first consumer complaint of a
16 2002 Camry engine surging when the brakes were depressed. Toyota received ten
17 other similar complaints before August 2002.
18

19 165. In March 2002, TMS asked TMC to investigate the root cause of the
20 surging. On May 20, 2002, internal records reported that the “root cause of the
21 ‘surging’ condition remains unknown” and “[n]o known remedy exists for the
22 ‘surging’ condition at this time.”¹²
23

24 166. In response to a NHTSA investigation into similar incidents, Toyota
25 issued at least three “Technical Service Bulletins” related to SUA. On August 30,
26

27 ¹¹ TOY-MDLID00041130T-0001.

28 ¹² TOY-MDLID00062906.

1 2002, Toyota released a bulletin alerting that some 2002 Camry vehicles “may
2 exhibit a surging during light throttle input at speeds between 38-42 MPH with lock-
3 up (L/U) ‘ON.’” Toyota advised that the cars’ ECM calibration had been revised to
4 correct the problem. Yet, on December 23, 2002, Toyota released another bulletin
5 noting that 2002 and 2003 Camrys, produced at Toyota Motor Manufacturing of
6 Kentucky (“TMMK”), “may exhibit a triple shock (shudder) during the shift under
7 ‘light throttle’ acceleration.” The bulletin advised dealers to follow the repair
8 procedure in the bulletin to rectify the situation. Less than nine months later, Toyota
9 released a nearly identical advisory notice on May 16, 2003, which stated that some
10 2003 Camrys “may exhibit a surging during light throttle input at speeds between 38-
11 42 mph with lock-up (L/U) ‘ON.’” Again, Toyota claimed the ECM calibration had
12 been revised to correct this condition. Toyota did not disclose the existence of these
13 technical service bulletins to consumers, or the fact that Toyota could not solve the
14 problem.
15

16
17 167. On August 31, 2002, Toyota recorded its first warranty claim to correct
18 a throttle problem on a 2002 Camry. Customer warranty claims are handled by the
19 TMS Claims Department in Torrance, California.¹³
20

21 168. On April 17, 2003, Peter Boddaert of Braintree, Massachusetts, filed with
22 NHTSA a report of SUA involving his 1999 Lexus. In response, NHTSA opened
23 Defect Petition DP03-003. Mr. Boddaert petitioned the agency to analyze 1997-2000
24 Lexus vehicles for “problems of vehicle speed control linkages which results [sic] in
25 sudden, unexpected excessive acceleration even though there is no pressure applied to
26

27
28 ¹³ See TOY-MDLID00023851.

1 the accelerator pedal.” In his petition, Mr. Boddaert noted that 271 other complaints
2 about these vehicles had been lodged on NHTSA’s website, 36 of which involved
3 problems with “vehicle speed control.” Of those 36 complaints, several involved
4 collisions, including one in which a Lexus had “collided with five other cars in the
5 space of ½ mile before it could be stopped.”
6

7 **2. Reports of SUA in Toyotas with ETCS are 400% higher than in**
8 **Toyota’s with mechanical throttle controls**

9 169. On January 15, 2004, Carol Mathews asked NHTSA to investigate 2002
10 and 2003 Lexus ES 300s, “alleging that [her] throttle control system malfunctioned
11 on several occasions, one of which resulted in a crash.” On March 3, 2004,
12 NHTSA’s ODI opened a Preliminary Evaluation (PE04-021). NHTSA documents
13 describe the problem to be investigated as: “Complainants allege that the throttle
14 control system fails to properly control engine speed resulting in vehicle surge.” The
15 investigation was initially expected to cover more than one million 2002-2003
16 Camry, Camry Solara and Lexus ES 300 vehicles. ODI had received 37 complaints
17 and reports of 30 crashes resulting in five injuries.
18

19 170. Mr. Scott Yon was the designated investigator. He would remain
20 NHTSA’s principal investigator on many subsequent SUA-related investigations and
21 developed a close relationship with Toyota executives, some of whom had been
22 NHTSA employees.
23

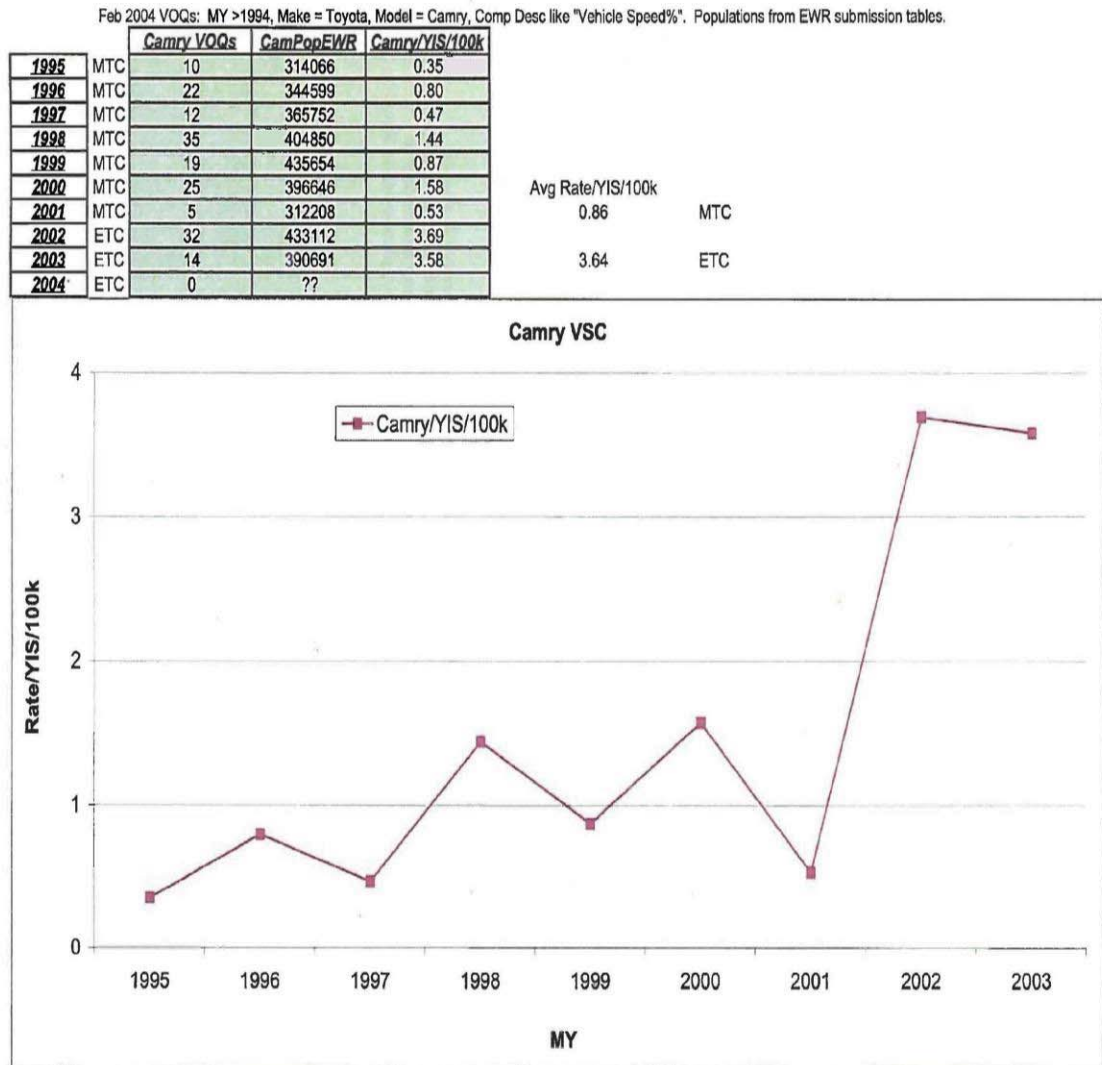
24 171. The NHTSA investigation described the defect allegations as:
25 Allegations of (A) an engine speed increase without the
26 driver pressing on the accelerator pedal or, (B) the engine
27 speed failing to decrease when the accelerator pedal was no
28

1 longer being depressed – both circumstances requiring
2 greater than expected brake pedal application force to
3 control or stop the vehicle and where the brake system
4 function was reportedly normal.¹⁴
5

6 172. On June 3, 2004, Scott Yon sent to Christopher Santucci, a Toyota
7 employee in Technical and Regulatory Affairs, an e-mail showing a greater than
8 400% difference in “Vehicle Speed” complaints between Camrys with manually
9 controlled and electronically controlled throttles:

10 From: Yon, Scott
11 Sent: Thursday, June 03, 2004 9:15 AM
12 To: Chris Santucci (Toyota.com)
13 Subject: For review
14 Categories: PE04021-ToyotaThrottleControl
15 Attachments: CamryVSC trend-200402.pdf
16 See attached. Give me a call, when you have time; I want
17 to discuss the submission and the attached.
18
19 Scott
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¹⁴ TOY-MDLID00041712.



173. Motor vehicle manufacturers frequently re-design their vehicles, as when Toyota implemented ETCS. But having taken that step, Toyota should have monitored NHTSA's consumer safety database for indications of changing patterns in the complaints by model that signaled the need to review the safety of ETCS and the need to implement a robust fail-safe, including, but not limited to, an effective brake-override.

174. In many industries in which product safety is of particular public concern (e.g., the pharmaceutical, automotive and aviation industries), manufacturers

1 and regulatory agencies collect information on safety incidents through various
2 channels and maintain data on adverse events or incidents. These databases are
3 intended to serve as early-warning systems to identify trends that could indicate the
4 presence of a safety defect. Such safety incident reporting systems have multiple
5 uses for manufacturers and regulators, including, for example, in investigations of
6 new safety concerns related to a marketed product, evaluations of a manufacturer's
7 compliance to reporting and other regulations, and responses to information requests.

9 175. In the automotive industry, information on safety-related incidents is
10 collected by both manufacturers and by NHTSA through its Office of Defects
11 Investigation. The sources of these data include consumer complaints submitted to
12 the manufacturer and/or agency. NHTSA technical staff continually analyze
13 consumer complaints "to determine whether an unusual number of complaints of
14 potential safety-related problems have been received on any specific line of vehicles.
15 NHTSA also uses its market surveillance system to determine whether "to open an
16 investigation, grant a petition for a defect investigation, determine the adequacy of
17 safety recalls, and grant a petition for a public hearing on the adequacy of a safety
18 recall.
19

20
21 176. Publicly available consumer complaints which exclude the complaints
22 Toyota received, show a pronounced increase in SUA complaints from Toyota
23 Camry owners after Toyota introduced ETCS-i in that vehicle. Through April 30,
24 2003, more than 9% of all complaints for Camrys equipped with ETCS-i related to
25 SUA, while only 5% of all complaints (41 of 810) for Camrys without ETCS-i
26 related to SUA. This difference is statistically significant based on Fisher's two-
27
28

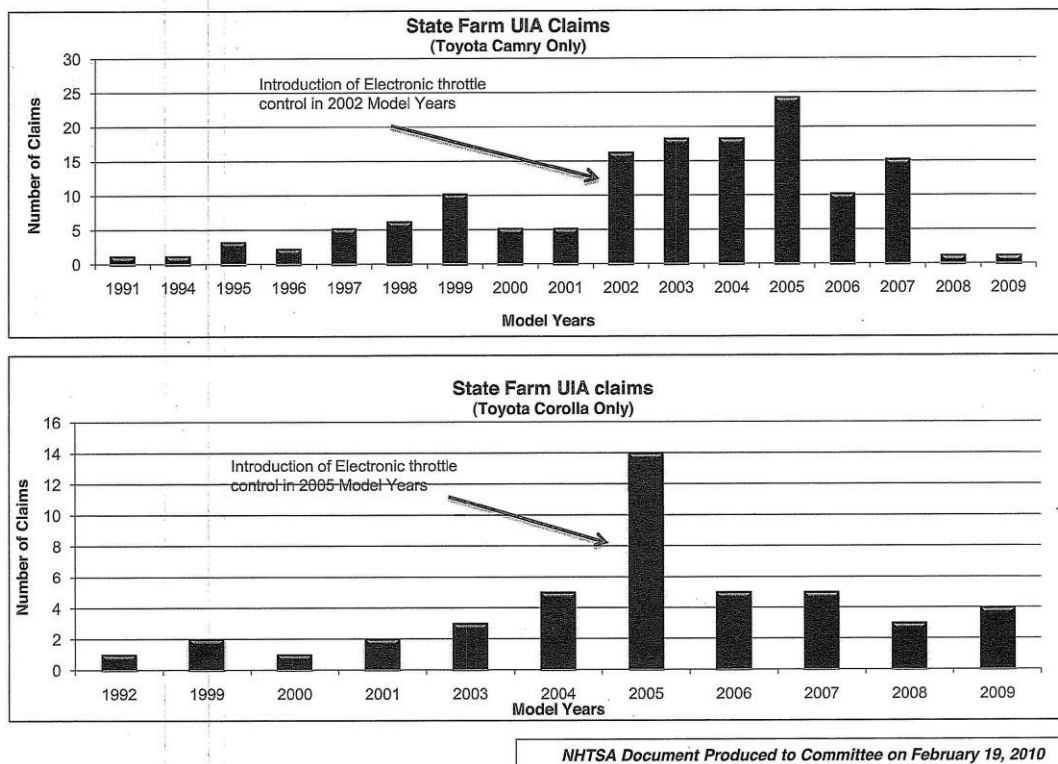
1 tailed exact test, $p = 0.0369$. The twin Lexus ES model showed a very similar
2 pattern of SUA complaints.

3 177. The Toyota Tacoma pickup also showed a marked increase in SUA
4 complaints after Toyota introduced ETCS-i in this model. By the end of January
5 2007, nearly 5% of all complaints (12 of 241) for Tacomas equipped with ETCS-i
6 related to SUA (12 of 241) while only 2% of all complaints (9 of 449) for Tacomas
7 without ETCS-i. This difference is statistically significant based on Fisher's two-
8 tailed exact test, $p = 0.0368$.


9
10 178. A similarly striking trend occurs in several other models: Lexus ES
11 (5-fold increase), Lexus RX (1.8-fold increase), 4Runner (6-fold increase), Avalon
12 (2-fold increase), Camry (3.7-fold increase), Highlander (2.8-fold increase), and
13 Tacoma (14-fold increase).

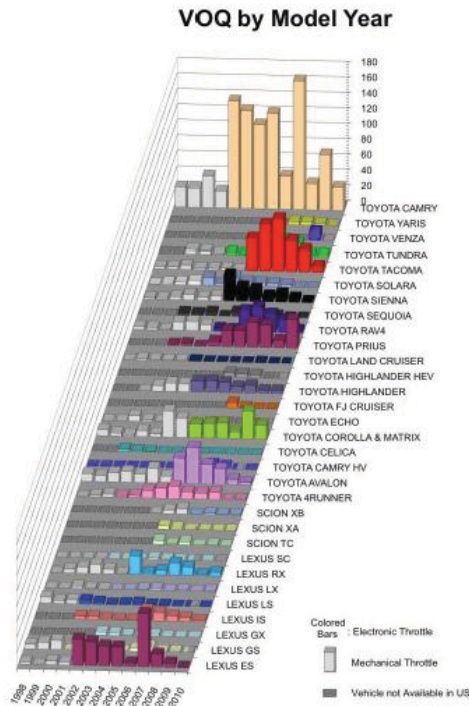
14
15 179. State Farm observed the same trend in Toyota Camrys and Corollas, as
16 reflected in the chart below (which State Farm provided to Congress):
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18
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State Farm UIA Claims (Pre-ETC v. Post-ETC)



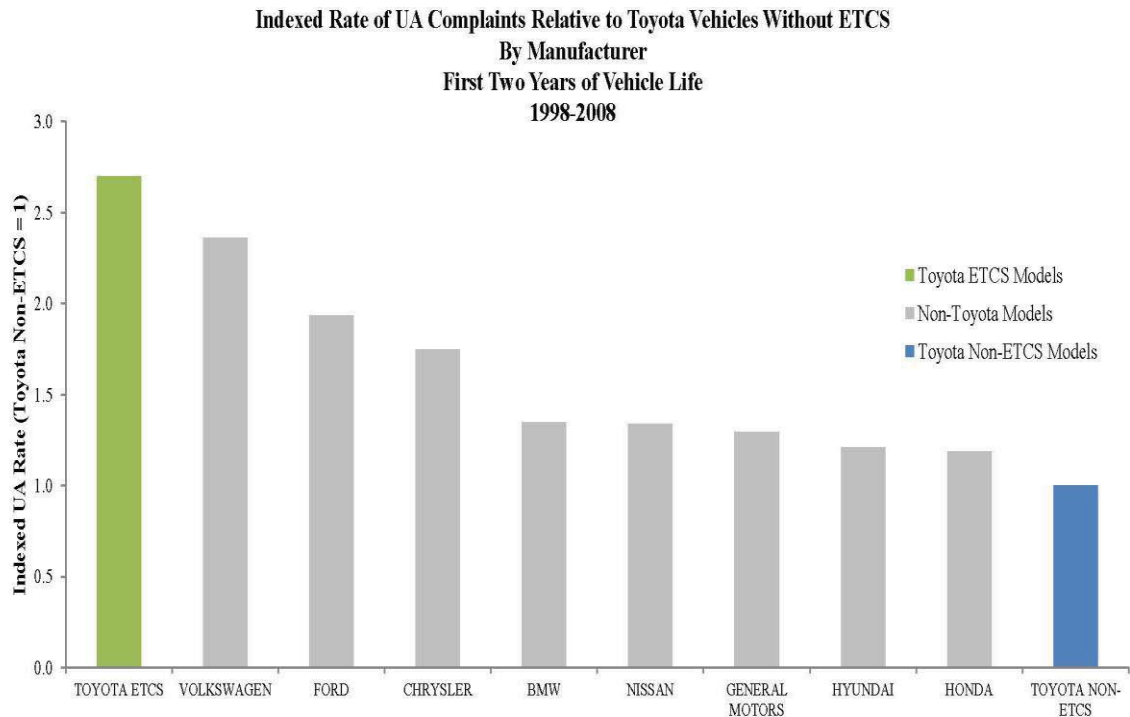
180. NASA's review of the NHTSA VOQ database showed increases in UAs in Toyota models when the design changed from a mechanical to electronic throttle system:

	NASA Engineering and Safety Center Technical Assessment Report	Version: 1.0
Title:	National Highway Traffic Safety Administration Toyota Unintended Acceleration Investigation	Page #: 30 of 177



*Figure 6.2.3-1. Number of VOQs by TMC Vehicle Model and MY
Grey bar indicates mechanical throttle, Colored Bar indicates ETCS-i throttle*

181. The UA rates for Toyota ETCS vehicles during the period 1998-2008 were 1.7 times greater than that of other manufacturers and were -0.6 times less for non ETCS Toyota vehicles. In other words Toyota went from having fewer UAs with non ETCS vehicles than other manufacturers to having more in Toyota ETCS vehicles:



182. If one examines the combined unique NHTSA UA complaints with those reported to Toyota but never made public this trend, non-ETCS v. ETCS vehicle on reports becomes even more significant. The ETCS to non-ETCS ratio for the Camry is 8.4, Avalon 6.4, Highlander 6.2, and Lexus RX 5.1.

183. Toyota should have been aware of these trends and disclosed such increases in propensity of UA to class members. Toyota also should have but did not analyze its customer care database, dealer database and other internal sources to confirm these trends.

184. Although Toyota denies that ETCS results in increased UA, forensic examination of the pedal interface in the same model before and after introduction of ETCS indicates that pedal design changes are not the root cause of increased UA rates. It is not likely that users had a higher rate of pedal misapplication in vehicles with ETCS compared to vehicles without ETCS.

1 185. This statistically significant increase in the number of unintended
2 acceleration complaints put Toyota on notice that there was a defect in its vehicles
3 with ETCS that could cause SUA.

4 186. Toyota's complaint database was not the only source of information
5 available to Toyota. Internally, as early as May 5, 2003, in secret "Field Technical
6 Reports" Toyota was documenting "sudden[] acceleration against our intention,"
7 as an "extremely serious problem for customers."¹⁵ A technician reported a SUA
8 incident and stated "we found mis-synchronism between engines speed and throttle
9 position movement." The probable cause was unknown but "[e]ven after
10 replacement of those parts, this problem remains." The author requested
11 immediate action due to the "extremely dangerous problem" and "we are also
12 much afraid of frequency of this problem in near future." Although this vehicle
13 may or may not have ETCS the FTR admits that SUA events create serious safety
14 issues.
15

16 187. At the outset of its 2004 investigation into SUA in Toyota vehicles,
17 NHTSA asked Toyota for information on similar incidents. The decision on how to
18 respond to NHTSA emanated from a group of Toyota employees, including
19 Christopher Tinto and Christopher Santucci in Washington, D.C., as well as others
20 from the Product Quality and Service Support group in Torrance, California. The
21 scope of NHTSA's information request became the subject of negotiations between
22 Messrs. Tinto and Santucci of Toyota and NHTSA representatives. Ultimately,
23
24
25
26
27

28 ¹⁵ TOY-MDLID00087951-52.

1 NHTSA agreed to exclude, certain highly relevant categories of incidents from its
2 investigation.

3 188. In response to NHTSA's information request, Toyota denied that a
4 defect existed, stated that there was no defect trend and that its electronic control
5 system could not fail in ways its engineers had not already perceived. Toyota
6 reported 123 complaints that it said "may relate to the alleged defect." But Toyota
7 excluded from its response the following relevant categories of complaints, among
8 others:
9

- 10 (1) An incident alleging uncontrollable acceleration that
11 occurred for a long duration;
- 12 (2) An incident in which the customer alleged that he
13 could not control a vehicle by applying the brake; and
- 14 (3) An incident alleging unintended acceleration
15 occurred when moving the shift lever to the reverse or the
16 drive position.
17

18 189. As early as January 2004 TMS sent TMC a "TMS Market Import
19 Summary" confirming an emerging product quality issues" on the 16R-FE V-6
20 engine. The issue involved unwanted acceleration where the affected vehicles have
21 not exhibited any MIL "on" or Check Engine Light and no stored DTC's have been
22 found in ECM memory.¹⁶
23

24 190. The Toyota Defendants thus concealed from NHTSA and the public
25 relevant customer complaints.
26

27 ¹⁶ According to the tutorial given to this Court a UA without MIL or DTC is
28 impossible – but this document states otherwise. TOYMDL1000150447

1 191. NHTSA closed the investigation without testing of the integrity of the
2 ETCS-i, without reviewing any records of Toyota's test reports concerning the
3 ETCS-i, and without reviewing whether the braking system was effective in an open-
4 throttle condition. Toyota itself did not have the capability of fully modeling, testing
5 or validating the safety of ETCS-i because of its failure to implement standard design
6 platforms, its failure to develop and/or conduct meaningful ECM test procedures,
7 and its failure to exercise appropriate control over third-party subsystem designs.
8

9 192. While Toyota denied any SUA defect, independent experts concluded
10 otherwise. In May 2004, a Forensic Technologist and MSME examined a vehicle in
11 New Jersey that had experienced a SUA event. The report was forwarded to Toyota
12 on January 13, 2005. It concluded that the vehicle's ETCS was not operating
13 correctly.¹⁷ This report was not provided to NHTSA.
14

15 193. Internally, Toyota was replicating the SUA defect not caused by floor
16 mats or sticky pedals and was aware that such events occurred without triggering a
17 trouble code or "DTC." Toyota frequently rejected SUA complaints from consumers
18 based on the lack of a trouble code, even though it replicated SUA defects without a
19 DTC: "Dealer technician checked for DTC ... and could not find any trouble codes
20 ... and was able to duplicate customer complaints ... engine speed remains at
21 5,000 rpm." In these duplicated SUA tests Toyota was often secretly replacing
22 throttle bodies in the vehicles.
23

24 194. On July 8, 2005, Mr. Jordan Ziprin of Phoenix, Arizona, filed a formal
25 request for a defect investigation into unintended acceleration in the 2002 Toyota.
26

27 _____
28 ¹⁷ TOY-MDLID90064979.

1 195. On August 5, 2005, NHTSA opened Defect Petition DP05-002 to
2 investigate Mr. Ziprin's claims. Scott Yon again was assigned as NHTSA's
3 investigator. The target vehicle population was 1,950,577 2002-2005 Camrys and
4 Lexus ES models. The Opening Resume stated, in part:

5 The Petitioner owns a 2002 Camry and states that in July
6 2005 the vehicle accelerated without application of the
7 throttle pedal while reversing out of a driveway; the
8 acceleration caused a loss of vehicle control and
9 subsequent crash.... The Petitioner states a similar throttle
10 control incident occurred in April 2002 and additionally
11 cites other ODI reports which also allege loss of throttle
12 control and or uncontrollable acceleration. The Petitioner
13 discusses NHTSA investigation PE04-021, which involved
14 the Camry and ES models, and makes a request for certain
15 information. ODI will evaluate the petition and other
16 pertinent information.
17
18
19

20 196. After receiving the petition and reviewing the underlying complaints,
21 Toyota did not launch its own investigation or identify any new tests that it would
22 perform to check for a defect in the ETCS. Instead, Toyota's formal responses to
23 NHTSA's investigation recommend NHTSA deny the petition based only on the
24 information Toyota had previously provided "as well as the lack of evidence
25 supporting concurrent failure of the vehicle braking systems." After explaining how
26 the electronic throttle system and its fail-safes were designed to operate, Toyota
27 concluded:
28

1 [T]here is no factor or trend indicating that a vehicle or
2 component defect exists. Toyota believes this Defect
3 petition to be similar to other, prior petitions and
4 investigations into mechanical throttle controls. Toyota
5 has found no evidence that differentiates that consumers
6 alleging vehicles equipped with electronic throttle controls
7 can suddenly accelerate when compared to those equipped
8 with mechanical throttle controls. Toyota has not found
9 any evidence on the subject vehicles of brake failure, let
10 alone brake failure concurrent with ETC failure.
11

12
13 *See* Toyota's Response re DP05-002, dated November 15, 2005.

14 197. This response of "no evidence" ignores and concealed the spike in SUA
15 events that occur within one year of a vehicle switching to ETCS, a trend known to
16 Toyota.

17 198. Mr. Yon, who is not an electrical engineer or expert in electronic control
18 systems, inspected Mr. Ziprin's vehicle and found no evidence of a system
19 malfunction. Mr. Ziprin directed to NHTSA's attention some 1,172 Vehicle Owner
20 Questionnaire reports, from which ODI identified 432 reports that alleged an
21 "abnormal throttle control event." The 432 reports involved 2002 to 2005 Camry,
22 Solara and Lexus ES models (all equipped with ETCS). Toyota had knowledge of
23 the 432 reports.
24

25 199. Upon learning of the denial, Mr. Ziprin, who had conducted
26 considerable research into the issues set forth in his petition and filed his findings
27
28

1 with the agency, reacted with an angry letter to NHTSA dated January 5, 2006, and
2 accused the agency of bias:

3 Frankly, I anticipated that decision from the very first time
4 I was in contact with Mr. Scott Yon, the assigned
5 investigator. He made statements during our first
6 telephone conversation which tended to establish that the
7 purpose of his inquiry was to establish a basis to dismiss
8 the petition based upon NHTSA policy rather than to deal
9 with and examine all of the facts and circumstances
10 involved. When Mr. Yon subsequently visited Phoenix, he
11 told me quite clearly and emphatically that it was
12 NHTSA's firm policy not to investigate safety issues
13 regarding hesitations in acceleration by vehicles.

16 200. On September 14, 2006, ODI opened Defect Petition DP06-003 in
17 response to a request from William Jeffers III for an investigation of 2002-2006
18 Camry and Camry Solara vehicles for incidents relating to vehicle surging. Scott
19 Yon was again assigned to investigate. According to the petition, Mr. Jeffers owned
20 a 2006 Camry and previously owned a model-year 2003 Camry. He alleged that both
21 vehicles exhibited "engine surging," which he described as a short duration (one- to
22 two-second) increase in engine speed occurring while the accelerator pedal is not
23 depressed. For his 2006 vehicle, the petitioner estimated that six to eight surge
24 incidents, of varying magnitude, occurred over the course of 10,000 miles and nearly
25 seven months of ownership. In the last and most alarming instance, Mr. Jeffers noted
26 that the malfunction indication lamp was illuminated during and after this incident.
27
28

1 201. Toyota received a fax from NHTSA on September 15, 2006, stating that
2 it had agreed to open the defect petition. In internal e-mails, Chris Santucci
3 expressed skepticism of Mr. Jeffers' account of the unintended acceleration and hope
4 that NHTSA would not ask Toyota to provide any additional data as part of the
5 investigation:
6

7 Hopefully, this is just an exercise that NHTSA needs to go
8 through to meet its obligations to the petitioner. Hopefully,
9 they will not grant the petition and open another
10 investigation.¹⁸
11

12 202. Although Mr. Jeffers reported that the brake system was effective at
13 overcoming the engine surge, he informed NHTSA of his concerns that this might
14 not always be the case. NHTSA summarized in its ODI Closing Resume: "[H]e is
15 concerned about reports filed with NHTSA alleging uncontrolled surging in MY
16 2002 to 2006 Camry vehicles bringing those vehicles to a high rate of speed (in some
17 cases, purportedly, with the brakes applied)."
18

19 203. While NHTSA's investigation was ongoing, two other related events
20 occurred. First, on February 5, 2007, a fatal crash occurred in San Luis Obispo,
21 California, involving a 2005 Camry that suddenly accelerated in a restaurant parking
22 lot, went through a guard rail and over a cliff into the Pacific Ocean. Second, on
23 March 14, 2007, TMS President James Lentz received a letter at his office in
24 Torrance from a consumer explaining a SUA event in a 2003 Toyota Camry.¹⁹ The
25 writer insisted he was pressing the brake, and not the accelerator, when the event
26

27 ¹⁸ TOY-MDLID00044092.

28 ¹⁹ TOY-MDLID90045217.

1 occurred. Further, the writer believed that the vehicle's electronic throttle caused the
2 event.

3 204. After the cursory evaluation of Mr. Jeffers' claims, NHTSA denied the
4 petition and stated it found no evidence of a defect.

5
6 205. Toyota never fully disclosed to the regulators the actual numbers of
7 customer reports of unintended acceleration events in the various Toyota models
8 under investigation that the company had received. In fact, Toyota disclosed that it
9 had received only 1,008 such complaints. Three years later, however, Toyota would
10 be required to disclose to Congressional investigators that it had received 37,900
11 complaints potentially relating to sudden acceleration in Defective Vehicles from
12 January 1, 2000, through January 27, 2010.

13
14 206. One of Toyota's strategies in responding to SUA complaints has been to
15 blame any report of SUA on driver error. Toyota failed to disclose that its own
16 technicians often replicated SUA events without driver error. The following is an
17 example:

18 **Condition Description**

19 Customer states while at a stop the engine started to rev
20 and tried to take off. Customer turned off vehicle and
21 restarted. Vehicle continue to rev when running. Turning
22 vehicle off 3rd time and restarted vehicle operated
23 normally after third start.

24 **Diagnostic Steps**

- 25
- 26 • Technician who was inspecting the vehicle had
27 driven it approximately 10-12 minutes.

- 7-8 minutes into the drive the technician was sitting at a stop light. When the stop light changed the tech started to lightly accelerate.
- After traveling 20-30 feet the vehicle exhibited a slight hesitation *then began to accelerate on its own*.
- Engine speed was estimated to have gone from 1500 rpm to 5500 rpm at the time of the occurrence.
- Vehicle traveling 9-10 mph at time of occurrence. Approximate maximum speed reached was 20 mph prior to accelerator pedal release / brake application.
- Estimated throttle position at the time of the occurrence was 15-20 percent.²⁰ [Emphasis added.]

207. Upon the technicians replicating a SUA event, Toyota decided it was in the customer's "interest" for Toyota to buy back the vehicle, meaning in reality that Toyota decided to remove this vehicle from the market since it was experiencing SUA incidents that could not be blamed on the driver. And, to further conceal the defect Toyota required as a condition of the vehicle repurchase that the owner sign a confidentiality agreement and agree not to sue. This confirmation of a clear SUA event not reported to NHTSA and was concealed.

208. In a Field Technical Report dated April 18, 2006, involving a 2007 Camry, a technician confirmed the "Vehicle Lunges forward":

²⁰ TOY-MDLID00075242.

Condition Description

Vehicle lunges forward when coming to a stop

Diagnostic Steps:

- Drove vehicle at 55mph, got vehicle to go into 5th gear, when slowing down and coming to stop, right at 5 mph the vehicle would lunge forward
- Drove vehicle in 4th gear, and when coming to a stop, once the vehicle reached 5mph, vehicle would lunge forward
- Drove vehicle in 3rd gear, and when coming to a stop, when the vehicle reached 5mph, vehicle would lunge forward
- Each of these test were complete with the A/C on and off, no change

Probable Cause Unknown²¹

209. "Lunging" apparently was a problem service managers were aware of:

From: Mike Robinson/=Mobile/Toyota.

Sent: 5/25/2007 5:15 PM.

To: Gordon Rush/=Lexus/Toyota@Toyota.

Cc: Gary_Heine@Toyota.com.

Bcc:

²¹ TOY-MDLID00065813

1 Subject: Avalon Drivability Customer Verbatim
2 Information - Updated.
3

4 Gordon, can you please review the below comments and let
5 me know if this is the type of information you are looking
6 for? I have added some PQS data verbatims as well, but
7 was unsure if they would be suitable for your purposes.
8
9

10 ***
11

12 “(I) Have recently purchased a 2006 Avalon LTD and have
13 experienced the hesitation problem. The situation is
14 dangerous ... not so much the hesitation as the lunge after
15 the hesitation. Toyota had better get going quick as I
16 predict this will result in numerous accidents and possible
17 deaths. I have talked with my service manager and he said,
18 “they all do it.”
19
20

21
22 Regards,

23 Mike

24 Mike Robinson

25 Technical Supervisor

26 Quality Assurance Powertrain Group
27
28

1 Toyota/Lexus Product Quality & Service Support

2 Office: (310) 468-2411

3 210. On another occasion in October 2007, a Field Technical Report
4 confirmed a case of SUA in an ES 330.²²
5

6 211. In a Dealership Report in 2005, on a 2005 Sequoia, the dealer verified
7 two separate SUA incidents and identified the probable cause as a “software issue of
8 the engine control unit.”

9 212. In December 2003, in a secret Field Technical Report, a technician
10 verified a surge event during “cold engine operation” even where the scan tool
11 showed no DTC.
12

13 213. In a series of Field Technical Reports from 2006-2010 involving Toyota
14 Camrys, technicians from Hong Kong confirmed UA events and that these events
15 were not caused by pedal or floor mats. The UA events were duplicated without
16 triggering a DTC. These technicians strongly urged TMS to investigate since the
17 problem was highly dangerous and the incidents were stacking up. In many of these
18 instances, the report noted that “no effective rectification can be done at this
19 moment” and that the exact cause was “unknown.” These reports “strongly request
20 TMS to investigate this case a top priority.”²³
21

22 214. In an Intra-Company Communication, between Toyota Motor North
23 America, Inc. and TMS, the company confirmed a SUA event and that floor mats
24 were not the issue:
25

26
27 ²² TOY-MDLID00075600.

28 ²³ TOY-MDL-88641.

1 **Introduction**

2 The purpose of this document is to provide a summary of a
3 Go-and-See related to a customer's claim of Cruise Control
4 Malfunction in a 2009 Tacoma vehicle.
5

6 **Customer Observed Condition**

7 Customer alleges that he experienced the following:

8 Vehicle: 2009 Tacoma with 2,387 Miles (at time of
9 incident)

- 10 1. Vehicle was traveling at a steady 60 MPH Speed on the
11 Freeway, with cruise control engaged
- 12 2. As he reached a slight incline, he started to approach a
13 slower vehicle in the lane in front of him
- 14 3. He applied pressure to the accelerator (25% - 30%
15 throttle angle) and increased speed to 75 MPH to pass
16 the other vehicle
- 17 4. Once he passed the slower vehicle, he returned to the
18 right hand lane and released the accelerator (expecting
19 the vehicle to return to the previously set speed)
- 20 5. After releasing the accelerator pedal, the vehicle
21 continued to accelerate
- 22 6. He stepped on the brakes and the vehicle acceleration
23 did not stop
- 24 7. Customer cycled the key to the "OFF" position and
25 slowed to a stop using the brakes
26 slowed to a stop using the brakes
27 slowed to a stop using the brakes
28 slowed to a stop using the brakes

8. After sitting for a couple of minutes on the side of the road he restarted the engine and it operated normally and took it to the dealership

Dealer Investigation

Upon arrival at the dealership the Following was performed / found:

1. Inspected Floor Mats and found them properly secured, with no signs of witness marks upon them
2. No Present, Pending or History of any DTC's in the ECM (also confirmed at TMS by MILi)
3. Engine connections were secure and showed no damage
4. The vehicle was driven for 361 miles, at which time an abnormal condition *was duplicated* (an account of this condition can be found on Page 2.)

Requests

- Vehicle repurchase has been agreed upon, please evaluate vehicle upon receipt

Service Manager Observed Condition:

On 7/19/09, one of the dealership's Service Managers drove the vehicle and observed the following:

1. Vehicle was being driven on the Freeway with the Cruise Control engaged at a 70 MPH Target Speed on Flat Terrain

- 1 2. The Service Manager depressed the accelerator pedal
- 2 slightly (less than 10% throttle input)
- 3 3. As the vehicle reached what was estimated as 71 MPH,
- 4 it downshifted abruptly and accelerated at what was
- 5 perceived as a high throttle angle
- 6 4. As there was no traffic in front of him, the Service
- 7 Manager removed his foot from the accelerator
- 8 immediately upon the downshift and moved it
- 9 completely away from the pedal area
- 10 5. The vehicle continued to accelerate at what felt like an
- 11 estimated at a 70% throttle input with no pedal contact
- 12 from the driver
- 13 6. Within 300 feet of the initial acceleration, the vehicle
- 14 had reached 95 MPH. The estimated time to reach this
- 15 speed from 71 MPH was “between 5 and 10 Seconds”
- 16 7. The driver then applied the brake pedal and the
- 17 acceleration stopped
- 18
- 19
- 20
- 21

22 NTF Techstream Data

- 23 • As the Service Manager who experienced the condition
- 24 above is considered to be trustworthy and reliable, the
- 25 vehicle will be repurchased for further investigation
- 26 under SETR 9J467
- 27
- 28

1 215. On March 20, 2007, a truck owned by the service manager at Cedar
2 Rapids Toyota experienced a SUA event and confirmed it was not caused due to
3 floor mats. The throttle pedal assembly was replaced.

4 216. On March 29, 2007, ODI, apparently prompted by customer complaints
5 of unwanted acceleration in 2007 Lexus ES 350 vehicles, opened PE07-016. The
6 principal investigator was again Scott Yon. The stated "Problem Description" in the
7 Opening Resume was "[t]he accessory floor mat interferes with the throttle pedal."

8 217. Toyota attempted to prevent the opening of the investigation by offering
9 to send a letter to 2007 ES 350 owners "reminding them not to install all weather
10 mats on top of existing mats."²⁴ NHTSA did not agree, due to "too many complaints
11 on this one vehicle to drop the issue" and because the results "of a stuck throttle are
12 catastrophic."

13 218. On April 5, 2007, ODI sent its Information Request to Toyota, describing
14 its purpose as being "to investigate incidents of *vehicle runaway* due to interference
15 between the Lexus accessory floor mat (all-weather floor mat) and the accelerator
16 pedal" in 2007 Lexus ES 350 vehicles. (Emphasis added.) The request further
17 described "[a]llegations of A) excessive engine speed and or power output without the
18 driver pressing on the accelerator pedal or B) the engine speed and or power output
19 failing to decrease when the accelerator pedal was no longer being depressed or,
20 C) the subject component interfering with the operation of the throttle pedal."

21 219. During this inquiry, Toyota was careful to eliminate any hint that a much
22 broader issue was at stake – namely, SUA. Telling a consumer of a SUA defect is far
23

24
25
26
27
28 ²⁴ TOY-MDLID00003908.

1 more serious than being told of a possible “mat” problem. In describing the NHTSA
2 investigation TMS eliminated reference to throttle control problems and changed the
3 description to a “floor mat” problem:²⁵

4 Sorry we had a last minute change to the Q&A. Please
5 utilize this revised version of the Statement and Q&A. The
6 issue has been posted on the NHTSA website.
7

8 Sorry!

9
10 [Old]

11 NHTSA has received five consumer complaints regarding
12 *unintended throttle control* in the subject vehicles.
13

14
15 [New]

16 NHTSA received five consumer where the All Weather
17 Floor Mat may have interfered with the accelerator pedal
18 operation.
19

20 * * *

21
22
23
24
25
26
27
28

²⁵ TOY-MDLID00000566.

George Morino
National Manager
Quality Compliance Department
Product Quality and Service Support
Toyota Motor Sales, U.S.A., Inc.
Tel. 310-468-3392
Fax 310-468-3399 [Emphasis added.]

220. Culling any reference to vehicle speed control has been a standard tactic at Toyota. In 2005, in connection with the IS 250 All Weather Drive investigation, TMC removed any reference to speed control in letters sent to owners: “They pulled out the ‘vehicle speed control’ part. NHTSA may come back, but TMC wanted to try.”²⁶

221. Another tactic TMC has used with NHTSA to keep the SUA defect a secret has been to keep NHTSA away from employees who had knowledge of ECU failures. In 2007, while preparing for a meeting with NHTSA, Toyota plotted to keep away from the meeting the “engineer who knows the failure”:

[I]f the engineer who knows the failures well attends the meeting, NHTSA will ask a bunch of questions about the ECU. (I want to avoid such situations).²⁷

222. Toyota kept documents and informed personnel away from NHTSA despite the fact it knew the results of a “stuck throttle are ‘catastrophic.’”²⁸

²⁶ TOY-MDLID00002896.

²⁷ TOY-MDLID00075574.

²⁸ TOY-MDLID00003908.

1 223. While this investigation was pending, a SUA victim sent Toyota
2 employees a video of his SUA event that showed the brake lights were on while the
3 car was accelerating – conclusive proof that the incident could not be chalked up to
4 “driver error.” As usual, Toyota found nothing wrong with the car. The SUA victim
5 informed the Toyota specialist of other instances that needed investigation:
6

7 One just occurred last Friday, June 15, when this person
8 pulled into a parking lot with very few vehicles, he applied
9 the brakes and the Tacoma just kept going, he wasn’t about
10 to collide so, he let off the brake and re-applied the brake
11 and the vehicle stopped. The vehicle is a 2004 Tacoma,
12 purchased new by this person. The other incident involves
13 a 2006 Tacoma where all of sudden at a stop the
14 tachometer shot up to approximately 6,000 or 6,800 RPM’s
15 with his *right* foot off the accelerator and the *right* foot on
16 the brake.²⁹
17

18 All of these incidents were concealed from NHTSA and the public.
19

20 224. On August 8, 2007, ODI upgraded the preliminary evaluation to
21 investigate unintended accelerations in a target population of 98,454 2007 Lexus
22 ES 350s. The Opening Resume for EA07010 states, in part, as follows:

23 [T]he agency has 40 complaints; eight crashes and 12
24 injuries. Complainants interviewed by ODI stated that they
25 applied the throttle pedal to accelerate the vehicle then
26

27
28 ²⁹TOY-MDLID00206917.

1 experienced unwanted acceleration after release.

2 Subsequent (and sometimes repeated) applications of the
3 brake pedal reduced acceleration but did not stop the
4 vehicle. In some incidents drivers traveled significant
5 distances (miles) at high vehicle speeds (greater than
6 90 mph) before the vehicle stopped (ODI notes that
7 multiple brake applications with the throttle in an open
8 position can deplete the brake system's power [vacuum]
9 assist reserve resulting in diminished braking).
10

11 225. While Toyota was pointing the finger at floor mats it was investigating
12 UA events that it knew were not caused by floor mats, including an event where the
13 service manager at Cedar Rapids Toyota confirmed the UA was not caused by the
14 mat. Toyota replaced the throttle pedal assembly.
15

16 226. Despite having received a number of complaints of unintended
17 acceleration that could not be explained in terms of floor mats, Mr. Yon's description
18 of the investigation made no mention of any intent to study the electronic throttle
19 control system employed. Toyota did not study the ETCS system in this regard
20 either.
21

22 227. In internal e-mails between Toyota employees including Chris Santucci
23 and Chris Tinto exchanged in August 2007, Santucci stated that NHTSA
24 investigators had discussed with him fail-safe mechanisms used by other vehicle
25 manufacturers to protect against unintended acceleration. The fail-safes that NHTSA
26 regulators discussed with him included "[u]sing ETC to shut down throttle control"
27 and "cutting off the throttle when the brakes are applied." Mr. Santucci also noted,
28

1 “Jeff [Quandt, Chief, Vehicle Controls Division, Office of Defects Investigation]
2 mentioned that another manufacturer allows the engine to be shut off if you press the
3 ignition button repeatedly.” Despite the growing number of SUA complaints starting
4 from 2002, Toyota did not use the fail-safe mechanisms used by other manufacturers
5 to protect against unintended acceleration.
6

7 228. While Toyota was attempting to deflect this inquiry, it was aware that
8 the root cause of SUA was not often traceable: “[O]ne big problem is that no codes
9 are thrown in the ECU, so the allege [sic] failure (as far as we know) can not be
10 documented or replicated.” The implications were “[t]he service tech therefore can’t
11 fix anything, and has no evidence that any problem exists.”³⁰ Toyota would later
12 claim the lack of a diagnostic code indicated that there was no SUA problem.
13

14 229. On August 30, 2007, ODI filed a memo about the inspection of a Lexus
15 ES 350 that had experienced SUA, and ODI conducted a telephone interview with
16 the owners. An inspection of the vehicle found all-weather mats installed at all four
17 seating positions. The driver’s side all weather mat was found to be installed by
18 itself; it was not on top of another floor mat. While the installed mat was found to be
19 unsecured by the retention hooks, the mat did not interfere with the accelerator pedal
20 in the position in which it was originally inspected.
21

22 230. While this investigation was ongoing, a woman named Jean Bookout
23 was involved in a fatal crash in Oklahoma due to the unintended acceleration of a
24 2005 Camry. On September 20, 2007, Ms. Bookout and her best friend, Barbara
25 Schwarz, were exiting Interstate Highway 69 in Oklahoma in a 2005 Camry. As
26

27
28 ³⁰ TOY-MDLID00050747.

1 Bookout drove, she realized that she could not stop her car. She pulled the parking
2 brake and pushed the brake pedal, leaving a 100-foot skid mark from the right rear
3 tire, and a 50-foot skid mark from the left. As Bookout later stated, "I did everything
4 I could to stop the car."³¹ The Camry, however, continued speeding down a ramp,
5 across another road and finally slamming into an embankment. Schwarz was killed;
6 Bookout spent a month in a coma and awoke permanently disfigured and disabled.
7

8 231. On September 26, 2007, Toyota issued a recall of 55,000 Lexus/Toyota
9 optional All-Weather Floor Mats. All owners of 2007 and early 2008 model year
10 Lexus ES 350 and Toyota Camry vehicles were to be notified of the safety campaign
11 and the timing when the replacement mats would become available. Once the
12 replacement mats were available, a second owner notification would be sent to notify
13 owners to return their mats for the driver's seating position to any Lexus/Toyota
14 dealer for an exchange. Toyota also stopped the sale of the Toyota/Lexus All-
15 Weather Floor Mat designed specifically for 2007 and early 2008 model year Camry
16 and ES 350 Lexus vehicles.
17

18 232. Internally, Toyota executives were pleased that NHTSA had limited the
19 ES 350 issue to "floor mat issues" as opposed to SUA:³²
20

21 Of note, NHTSA was beginning to look at vehicle design
22 parameters as being a culprit, focusing on the accelerator
23 pedal geometry coupled with the push button "off" switch.
24 We estimate that had the agency instead pushed hard for
25 recall of the throttle pedal assembly (for instance), we
26

27 ³¹ Los Angeles Times, *Runaway Toyota Cases Ignored*, November 8, 2009.

28 ³² TOY-MDLID00004973.

1 would be looking at upwards of \$100M + in unnecessary
2 cost.

3 233. Other top level Toyota officials were incredulous with the news that
4 NHTSA had limited the issue to floor mats. Irv Miller of TMS observed when he
5 learned of the recall: “Yea I know, but floor mats!”³³ (Analogous to Coach Jim
6 Mora’s comment about his then 4-6 Indianapolis Colts team: “Playoffs, you kidding
7 me? Playoffs? I just hope we can win a game.)

9 234. NHTSA remained concerned that a “serious issue” remains and that a
10 factor other than mats was causing SUA events. NHTSA was considering an
11 announcement that would instruct vehicle owners how to turn off the vehicle in the
12 event of a SUA event.³⁴ NHTSA also expressed concern that other vehicles,
13 including Prius, Camry and Avalon maybe subject to floor mat jamming and pedal
14 design issues.³⁵ Toyota did not disclose these concerns and took no action to remedy
15 these defects. Years later, in 2010, Toyota recalled the ES 350, Camry and Avalon,
16 due to a defect in the shape of the floor surface and the lack of adequate space
17 between the accelerated pedal and the floor.³⁶

19 235. On other occasions Toyota was able to keep NHTSA away from the
20 truth regarding SUA events by negotiating what terms it would use to search for
21 relevant complaints. An example occurred in September 2007 when the company
22 searched for incidents regarding “mats” as opposed to “surging.” A search for
23

24
25 ³³ TOY-MDLID00000601.

26 ³⁴ TOY-MDLID00011140.

27 ³⁵ TOY-MDLID00011139.

28 ³⁶ TOY-MDLID00200832.

1 surging on just the Camry in 2004 revealed “60,000 complaints.” Surging may be
2 related to SUA, but Toyota never revealed the 60,000 surging complaints.³⁷

3 236. In 2008, Toyota knew that it had received a “huge number of
4 complaints” alleging forms of UA Toyota labeled as “surge,” or “lunge” or “lurch” if
5 it searched for UA events just on the Camry:
6

7 Let’s discuss the response with George sometime on 10/13.

8 We just started to gather the field information in order to
9 update it requested in Q2, 3, 4 of IR for PE07-016.

10 However, I’m very concerned about how many customer
11 complaints will be extracted from CAN2000 by keyword
12 search which we usually do. Because NHTSA expanded
13 the scope of the subject vehicles to 2007-2009MY ES and
14 “CAMRY.” As you know, Camry has had an issue on the
15 6 speed automatic transmission and there may be a huge
16 number of complaints alleging the surge or lunge or lurch
17 and we usually include those words for the keyword
18 search. If this is the case, it will take long time to
19 complete.³⁸
20
21

22 237. Throughout Toyota’s consideration of SUA incidents, the “global
23 ramifications” of a vehicle defect was a motivating factor. Thus, for example, in
24 September 2009, Toyota executives indicated TMC would not easily budge from its
25 “no defect” position:
26

27 ³⁷ TOY-MDLID00083551.

28 ³⁸ TOY-MDLID0012726.

1 TMC on the other hand will most likely not easily budge
2 from their position that there is no vehicle defect.
3 Especially considering the global ramifications. In
4 addition, since no one of any rank (VP or higher) at TMS
5 has communicated the significance and impact of this
6 issue, TMC may feel that we can weather an investigation
7 and additional media coverage.³⁹

9 238. As described herein, this “no defect” position and the worry of “global
10 ramifications” ultimately caused Toyota to offer fail-safe mechanisms such as a
11 brake-override as a “confidence” booster as opposed to a “safety recall.”

13 239. In an internal Toyota PowerPoint presentation by Chris Tinto dated
14 January 2008, Toyota characterized the Camry and Lexus ES floor mat investigation
15 as a “difficult issue” that it “ha[d] been quite successful in mediating.” The
16 presentation went on to note that such “mediations” were “becoming increasingly
17 challenging” and that “despite the fact that we rigorously defend our products
18 through good negotiation and analysis, we have a less defensible product.” Of
19 course “mediation” is not the equivalent of meeting the pledge of “safety” first that
20 Toyota had repeatedly promised vehicle owners.

22 240. An internal PowerPoint addressing “Key Safety Issues” contains the
23 following:

- 24 • “Sudden Acceleration” on ES/Camry, Tacoma, LS, etc.

27
28 ³⁹ TOY-MDLID00075713.

- Recurring issue, PL/Design Implications.⁴⁰

241. The footnote to the slide has an entry stating “[f]laws in Toyota Regulatory and Defect Process.”⁴¹

242. Toyota was also pleased that the floor mat issue was limited to All Weather Floor Mats as opposed to floor mats in all vehicles. Internally it recognized that “floor mat interference is possible in any vehicle with any combination of floor mats.” Despite this admission, no broader floor mat recall or effort to implement a brake-override took place.⁴²

243. No broader floor mat recall was implemented despite evidence that Prius, Camry and Avalon models were sensitive to floor mat interference and that the problem was not limited to after market mats.⁴³

244. Toyota had knowledge many years prior to December 2010 of floor mat entrapment as one of the causes of SUA in all Toyota models and failed to properly notify NHTSA and consumers of the defect. On December 20, 2010, Toyota agreed to pay a fine of \$16,375,000 to NHTSA over the floor mat recall.

3. Unintended acceleration in Tacomas and Siennas

245. Toyota employees, including George Morino from the Torrance, CA office, were aware of increasing reports of SUA in Tacomas in late 2007. On November 6, 2007, Toyota employees reviewed the NHTSA consumer complaints database and counted “21 complaints pertaining to the Tacoma sudden

⁴⁰ TOY-MDLID00052959.

⁴¹ *Id.* at 52963.

⁴² TOY-MDLID00002839.

⁴³ TOY-MDLID00021197.

1 acceleration.”⁴⁴ Toyota internal e-mails also indicate that they were finding Internet
2 blog posts regarding SUA events in Tacomas in November 2007.⁴⁵

3 246. Toyota received a report in 2006 that a 2006 Tacoma “suddenly
4 accelerated out of control:

5 Mr. _____ has reported that his 2006 Toyota
6 Tacoma suddenly accelerated out of control into a
7 telephone pole as he was backing on 10/21/06.
8

9
10 After the truck collided with the pole he shifted into Drive
11 and the truck accelerated at a high rate into a parked
12 vehicle and a trailer, pushing the trailer into another parked
13 vehicle.⁴⁶
14

15 247. An insurance investigator interviewed the mechanic who was a witness:

16 Mr. _____ observed the 2006 Toyota Tacoma as it
17 backed into the telephone pole. He said that the engine
18 was racing and after the collision with the pole, the vehicle
19 lunged forward colliding with another vehicle and the box
20 trailer. The vehicle became pinned under the front of the
21 box trailer which prevented it from traveling any further.
22
23
24
25

26 ⁴⁴ TOY-MDLID00028006.

27 ⁴⁵ TOY-MDLID00012135.

28 ⁴⁶ TOY-MDLID00206868.

1 Mr. _____ said that he ran to the truck and assisted
2 the driver, Mr. _____, out of it.
3

4 I asked Mr. _____ as to how the engine
5 stopped racing. He said that the engine was still
6 racing/idling high at approximately 2500 - 3000 RPM's
7 after Mr. _____ exited the vehicle and while he was
8 standing in the parking lot, Mr. _____ said
9 that he reached in and turned the ignition key off to stop
10 the engine. Later, a police officer shifted the transmission
11 into park.
12
13

14
15 Mr. _____ offered to testify as to what he
16 witnessed in court if necessary. Because he is a mechanic,
17 I believe that he would be a formidable witness.
18

19 * * *

20 The most significant observation was made by the eye
21 witness, Mechanic _____ who witnessed the
22 incident and aided Mr. _____ from the truck. He
23 states that the engine was still racing at 2500-3000 RPM
24 after Mr. _____ exited the vehicle. The Toyota
25 was only brought under control when _____ reached
26 in and shut the engine off with the ignition key.
27
28

1 As, _____ is employed by the City Tire as a
2 mechanic his estimate of the engine RPM's is rather
3 credible and consistent with Mr. _____'s report.⁴⁷

4 248. In 2007, a Field Technical Report involving a Tundra, confirmed a
5 racing idle with "unknown cause."

6 249. Also, in October 2007 a "Toyota Master Technician" experienced an
7 UA event due to "sticky pedal operation." The cause was "unknown."⁴⁸

8 250. On January 10, 2008, William Kronholm of Helena, Montana, filed a
9 request for a defect investigation into unintended acceleration in 2006 Toyota
10 Tacoma pickup trucks. Kronholm reported experiencing two SUA incidents and
11 investigated the NHTSA complaint database for light truck fleets for model years
12 2006 and 2007. Under the category "vehicle speed control," Mr. Kronholm found 32
13 complaints of sudden unintended acceleration involving Tacomas, whereas the most
14 reported for any other manufacturer's trucks was one incident. Scott Yon was again
15 ODI's principal investigator.

16 251. Internally, Toyota was diligently working hard to "write a letter for the
17 committee to try to stop this from moving forward – we need to keep this within
18 NHTSA rather than have it expand to a hearing."⁴⁹

19 252. In NHTSA's February 8, 2008 information request to Toyota, it defined
20 the defect as:

21
22
23
24
25
26 ⁴⁷ TOY-MDLID00206876-6880.

27 ⁴⁸ TOY-MDLID00198376.

28 ⁴⁹ TOY-MDLID00050749.

1 [A]llegations or complaints that the accelerator and or
2 cruise control system operated improperly, malfunctioned,
3 failed, or operated in an unsafe manner, including but not
4 limited to, allegations that the engine speed (power output)
5 increased without driver application of the accelerator
6 pedal (including allegations that may be related to cycling
7 of the air conditioning compressor clutch or other so called
8 ‘normal’ idle speed/engine control functions), or
9 allegations that the engine speed (power output) failed to
10 return to an idle state after the operator released the
11 accelerator pedal (including allegations that may be related
12 to engine speeds experienced between gear shifts on
13 manual transmission vehicles at road speeds) or allegations
14 that the cruise control system caused the engine speed
15 (power output) to change in an unsafe manner.
16
17
18

19 253. While the Tacoma investigation was ongoing, ODI opened a
20 Preliminary Evaluation into unintended acceleration incidents involving 54,000 2004
21 Toyota Siennas. PE08-025 resulted from a report that a driver applied the accelerator
22 pedal to accelerate the vehicle and experienced unwanted acceleration upon releasing
23 the pedal. Field data collected by ODI indicated that when a retainer pin is missing
24 from the driver’s side center stack/console trim panel, the panel can detach from the
25 console, and the accelerator pedal can become entrapped under the trim panel
26 causing unwanted acceleration.
27
28

1 254. Five years earlier, in April 2003, Toyota had experienced an unintended
2 acceleration event during testing of a 2004 Sienna. This incident was purportedly
3 also caused by a trim panel on the center console interfering with the accelerator
4 pedal.

5
6 255. On April 18, 2008, Toyota filed its first response in DP0-8001, reporting
7 a total of 326 unique vehicle complaints of unintended acceleration in Tacomas.

8 256. On April 25, 2008, Toyota filed its second response in the Tacoma
9 investigation, outlining its investigation into the problem and analyzing the consumer
10 complaints submitted to Toyota and to NHTSA that could be related to alleged
11 unintended acceleration. In Toyota's view, neither the consumer complaints nor the
12 field study indicated the existence of any defect in the subject vehicles, much less a
13 safety-related defect.
14

15 257. Toyota disputed the assertion in the petition that the 32 complaints in
16 the NHTSA database "in and of themselves justify opening an investigation."
17 Toyota claimed that the Tacoma had been the subject of extensive media coverage
18 related to the possibility of sudden acceleration. In addition, Toyota claimed that
19 there had been a high level of internal activity on this subject (as far back as early
20 2007) including reports by members of Tacoma user groups detailing conversations
21 with ODI staff and providing ODI contact information.
22

23 258. On June 11, 2008, Toyota sent its first response to ODI in PE08-025
24 regarding 2004 Siennas, followed by a second response on June 25, 2008. Toyota
25 stated that complaints about unintended accelerations in Siennas took two forms:
26 allegations of excessive engine speed and/or power output without the driver
27 pressing on the accelerator pedal, or the engine speed and/or power output failing to
28

1 decrease (subside) when the accelerator pedal was no longer being depressed by the
2 driver. Toyota also said that it saw no evidence of a defect, explained that the trim
3 could catch the accelerator, and described the design changes it made to the trim
4 panel to correct the problem. Toyota did not disclose that it considered and knew it
5 needed to incorporate a brake-override and other fail-safe mechanisms that were not
6 in Toyota vehicles to address this problem.
7

8 259. On August 27, 2008, NHTSA denied the Tacoma petition, concluding:

9 The complaints fell into three groups. A majority of the
10 complaints may have involved the Tacoma's throttle
11 control system. Some complaints did not involve a failure
12 of the throttle control system. For the remaining reports,
13 although there may have been an issue with the throttle
14 control system as one possible explanation, we have been
15 unable to determine a cause related to throttle control or
16 any underlying cause that gave rise to the complaint. For
17 those vehicles where the throttle control system did not
18 perform as the owner believes it should have, the
19 information suggesting a possible defect related to motor
20 vehicle safety is quite limited. Additional investigation is
21 unlikely to result in a finding that a defect related to motor
22 vehicle safety exists or a NHTSA order for the notification
23 and remedy of a safety-related defect as requested by the
24 petitioner. Therefore, in view of the need to allocate and
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1 prioritize NHTSA's limited resources to best accomplish
2 the agency's safety mission, the petition is denied.

3 260. On October 15, 2008, Toyota made a confidential PowerPoint
4 presentation to ODI regarding unintended acceleration and trim interference in 2004
5 Siennas as part of EA08-014. Toyota demonstrated how an unrestrained early
6 design-level trim panel interacted with the accelerator after pedal depression. Toyota
7 also advised that the company was conducting a field survey to examine panel
8 retention and that preliminarily one vehicle had been identified with a concern.
9

10 261. On January 26, 2009, ODI closed EA08-014, regarding SUA involving
11 2004 early-production Siennas, after Toyota agreed to recall subject vehicles built
12 between January 10, 2003, and June 11, 2003. Toyota then issued Recall 09V023
13 for 26,501 model year 2004 Siennas. Toyota did not describe this as a defect, but
14 called the actions a "safety improvement campaign" that was not being conducted
15 under the Safety Act. Toyota's recall instructed dealers to replace the original floor
16 carpet cover with the newer-design floor carpet (and retention clip) at no charge to
17 the owner. The repair was expected to reduce the potential for trim panel
18 interference with the accelerator pedal should the retaining clips become missing
19 because of improper service or other reasons. Dealers were to replace the retention
20 clip and floor carpet cover at no charge.
21
22

23 262. On March 19, 2009, Mr. Jeffrey Pepski of Plymouth, Minnesota filed a
24 detailed defect petition, asking NHTSA to re-open its sudden unintended acceleration
25 investigation into Lexus vehicles. Mr. Pepski was the owner of a 2007 Lexus
26 ES 350. He experienced a sudden unintended acceleration event while driving at
27 high speed, in which the vehicle accelerated to 80 mph. Mr. Pepski tried pumping
28

1 and pulling up the accelerator with his foot to no avail. He explained the electronics
2 of the accelerator, brake pedals and throttle systems, and charged that the Lexus
3 ES 350 vehicles violate several federal motor vehicle safety standards regarding
4 brake and throttle systems. He also disputed some of the statements from previous
5 investigations that drivers could easily stop the vehicle by depressing the ignition
6 button for three seconds. He maintained that the owner's manual indicates that this
7 would lock the steering wheel and move it forward.
8

9 263. On April 8, 2009, ODI issued an Opening Resume for DP09-001 in
10 response to Mr. Pepski's petition. ODI characterized it as requesting "an additional
11 investigation into the unwanted and unintended acceleration of MY 2007 Lexus
12 ES 350 as the initial investigation (PE7-016) was too narrow in scope and did not
13 adequately address all complaints made to the NHTSA with respect to vehicle speed
14 control concerns." Additionally, according to ODI, the petitioner requested an
15 "investigation of MY 2002-2003 Lexus ES 300 for 'longer duration incidents
16 involving uncontrollable acceleration where brake pedal application allegedly had no
17 effect' that were determined not to be within the scope of Investigation PE04021."
18
19

20 264. On May 14, 2009, Toyota's Christopher Tinto filed a direct response to
21 Mr. Pepski's petition in DP09-001. Mr. Tinto dismissed all of the issues Mr. Pepski
22 raised in his petition and claimed there was no basis for an investigation. Mr. Tinto
23 stated that when Lexus inspected Mr. Pepski's vehicle, it found that the floor mat
24 was unsecured and blamed the event on pedal entrapment. Mr. Tinto maintained that
25 Toyota's electronic throttle and brakes systems were in compliance with all
26 applicable federal motor vehicle safety standards, and that Mr. Pepski had
27
28

1 misinterpreted the warnings in the owner's manual about steering wheel lockup
2 when the ignition is in the "Off" mode.

3 265. Toyota knew that NHTSA inspected Pepski's car and "did not see
4 clearly the witness marks of the carpeted floor mat in the forward unhooked
5 position" and instead "suspect[ed]" this was the case. Santucci made it clear that
6 NHTSA wanted Toyota to blame this on a floor mat issue, because if Toyota did not
7 do so, NHTSA would have to ask "for non-floormat reports":
8

9 So they should ask us for non-floormat related reports,
10 right? But they are concerned that if they ask for these
11 other reports, *they will have many reports that just cannot*
12 *be explained. And since they do not think that they can*
13 *explain them, they don't really want them.* Does that make
14 sense? I think it is good news for Toyota.⁵⁰ [Emphasis
15 added.]
16

17 266. What was good news for Toyota, *i.e.*, NHTSA avoiding inquiry into
18 non-floor-mat issues, was bad news for consumers who continued to purchase and
19 drive vehicles subject to a hidden SUA defect.
20

21 267. On October 29, 2009, NHTSA denied the Pepski petition. Once again,
22 ODI issued its denial without requiring Toyota fully to disclose the actual numbers
23 of customer reports of sudden unintended acceleration events in the Toyota models
24 under investigation it received.
25
26
27

28 ⁵⁰ TOY-MDLID00052918.

1 **4. The floor mat recall**

2 268. In August 2009, Officer Mark Saylor, a 19-year veteran of the
3 California Highway Patrol, his wife, thirteen-year-old daughter and his brother-in-
4 law, Chris Lastrella, were driving in a 2009 Lexus ES 350 loaned to them from the
5 dealership while Officer Saylor's Lexus was being repaired. Witnesses later
6 reported that Officer Saylor had pulled onto the shoulder going roughly 25-45 mph
7 and appeared to have some engine difficulty. Witnesses reported that Officer Saylor
8 turned on his emergency lights. Shortly thereafter the Lexus's speed accelerated to
9 over 100 mph. Chris Lastrella called 911 from the vehicle and reported that the
10 accelerator was stuck and "we're in trouble." He then repeated: "We're
11 approaching the intersection. We're approaching the intersection. We're
12 approaching the intersection." Others in the car could be heard saying "hold on" and
13 "pray." The Lexus then crashed into the back of an SUV and continued through a
14 fence, crashing head first into an embankment, becoming airborne, rolling over,
15 bursting into flames and coming to rest in a dry riverbed. All four members of the
16 Saylor family were killed by extensive blunt force injuries.

17 269. When officers inspected the vehicle, the all weather floor mat was
18 melted to the accelerator pedal and unsecured by the retaining clips. It was also the
19 incorrect all weather floor mat for that Lexus model. When officers tested the pedal
20 clearance using the same model of Lexus and the same mismatched floor mat, they
21 observed that the pedal could easily become stuck under its edge.

22 270. Officers investigating the Saylor tragedy also learned that a similar
23 complaint of unintended acceleration had been made about the vehicle involved in
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1 the Saylor crash only days before it was loaned to Officer Saylor. The San Diego
2 County Sheriffs' report chronicles the prior complaint as follows:

3 [Frank Bernard] was on the Poway Road on-ramp to
4 Interstate 15 North. As he was merging onto the freeway,
5 he saw a truck nearby and accelerated 'briskly' to get in
6 front of it. Witness Bernard got onto the freeway, and once
7 in front of the truck, let his foot off the accelerator. [The
8 Lexus] kept accelerating on its own, to about 80-85 MPH.

10
11 Witness Bernard stopped on the brakes and tried to lift up
12 on the accelerator with his right foot. He was attempting to
13 access the shoulder of the freeway, and still applying the
14 brakes, was able to slow [the Lexus] to about 50-60 MPH.
15 While he was slowing, he pushed the ignition button 'a few
16 times' and was not able to turn the engine off. He also
17 'popped the throttle' with his foot to see if he could get it to
18 clear itself. None of this worked. [The Lexus] kept
19 moving at an uncontrolled and high rate of speed.

22
23 Witness Bernard kept on the brakes, slowing [the Lexus] to
24 25-30 MPH and pulled over to the shoulder. He was able
25 to then place [the Lexus] into neutral with the gear shift.
26 When he did this, the engine made a very loud whining,
27
28

1 racing sound. Witness Bernard was able to stop [the
2 Lexus].

3
4 Witness Bernard looked down at his feet and saw the
5 accelerator was stuck underneath the floor mat. He was
6 able to pull it up with his foot, and said he had to apply a
7 significant amount of pressure to do so.⁵¹

8
9 271. Mr. Bernard told a receptionist at the dealership of the unintended
10 acceleration and that it was due to the floor mat.

11 272. The San Diego County Sherriff's Report concludes that the Saylor crash
12 was likely caused by the mismatched floor mat and the following "associated"
13 factors:

14
15 The vehicle was not equipped with a key that would other
16 wise allow for manual emergency shut off. The push
17 button ignition feature had no emergency instantaneous
18 shut capability.

19
20
21 As evidenced in the inspection of [the Lexus], the brakes
22 most likely failed due to over burdened, excessive, and
23 prolonged application at high speed.⁵²

24
25
26
27 ⁵¹ TOY-MDLID000091970 at 9193.

28 ⁵² *Id.* at 9197.

1 273. The report also notes that additional electrical, mechanical or computer
2 generated factors could have played a role in the unintended acceleration.

3 274. Following the widespread publicity surrounding the four-fatality Saylor
4 crash near San Diego, Toyota issued a “Safety Advisory,” saying that the company
5 had “taken a closer look” at the potential for the accelerator to get “stuck in the full
6 open position” *due to interfering floor mats*. The advisory stated that the company
7 would soon be recalling certain 2007-2010 Camry and Lexus vehicles, 3.8 million in
8 all, to address the issue – the largest recall in Toyota’s history and the sixth largest in
9 the United States. According to Senator Waxman, Toyota’s advisory is dangerously
10 misleading, for the following reasons, among others:
11

12 By suggesting that only a trapped floor mat can cause a
13 loss of throttle and braking control, it lulls owners of
14 models with no driver’s side floor mat into believing there
15 is no possibility of a potentially catastrophic loss of throttle
16 and braking control. According to documents supplied by
17 Toyota to the Committee on Energy and Commerce of the
18 U.S. House of Representatives, fewer than 16% of sudden,
19 unintended acceleration events reported by customers
20 involved floor mats and/or “sticky pedals.”
21

22 The advisory also misleads owners with a driver’s-side
23 floor mat into believing that, in the event of a sustained
24 near-wide-open throttle malfunction, the first response
25
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1 should be to visually determine if the floor mat is
2 interfering with the accelerator pedal.

3 275. The floor mat recall was part of Toyota's strategy to focus the cause of
4 SUA on mats and away from other defects. Secretly, as set forth below, Toyota
5 knew of other defects that caused SUA.
6

7 276. On September 29, 2009, the same day that TMC recalled 3.4 million
8 vehicles in the United States because of possible floor mat entrapment, Toyota Motor
9 Europe issued a Technical Information ("TI") to Toyota distributors in Austria,
10 Belgium, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany,
11 Greece, Holland, Hungary, Iceland, Ireland, Israel, Italy, Malta, Norway, Poland,
12 Turkey, Portugal, Russia, Slovenia, Spain, Sweden, Switzerland, Ukraine, the United
13 Kingdom, Georgia, Kazakhstan, and Romania identifying a production improvement
14 and repair procedure to address complaints by customers in those countries of sticky
15 accelerator pedals, sudden RPM increase and/or sudden acceleration – *but nothing*
16 *similar was issued to warn United States distributors.*
17

18 277. Despite its extensive investigation into the sticky pedal phenomenon,
19 and its efforts to remedy the sticky pedal defect for overseas consumers, TMC
20 continued to conceal information from United States consumers regarding potential
21 causes for sudden unintended acceleration events. On September 29, 2009, TMC
22 issued a Consumer Safety Advisory claiming that the sudden acceleration problem
23 was caused by floor mats without mention of the sticking accelerator pedal defect it
24 knew about since July 6, 2006, at the latest, and had confirmed no later than June
25 2009.
26
27
28

1 278. Contemporaneously with the floor mat recall, despite its Technical
2 Information (“TI”) on the sticky pedal alleged above, Toyota made media statements
3 inaccurately stating that NHTSA had determined that no defect exists in vehicles
4 wherein the driver’s side floor mat is compatible with the vehicle and is properly
5 secured. For example, a November 2, 2009 press release issued from Torrance, CA
6 announced:
7

8 Toyota Motor Sales ... today announced that it has begun
9 mailing letters to owners of certain Toyota and Lexus
10 models regarding the potential for an unsecured or
11 incompatible driver’s floor mat to interfere with the
12 accelerator pedal and cause it to get stuck in the wide-open
13 position. The letter, in compliance with the National
14 Traffic and Motor Vehicle Safety Act and reviewed by the
15 National Highway Traffic Safety Administration ... also
16 confirms that no defect exists in vehicles in which the
17 driver’s floor mat is compatible with the vehicle and
18 properly secured.
19
20

21 279. On November 4, 2009, NHTSA issued a press release to correct this
22 misleading and inaccurate information. NHTSA clarified that it told Toyota and
23 consumers that “removing the recalled floor mats is the most immediate way to
24 address the safety risk and avoid the possibility of the accelerator becoming stuck.”
25 NHTSA reiterated that the floor mat recall was simply an interim measure, and did
26 not correct the underlying defect.
27
28

1 280. Despite initiating its plan to repair defective accelerator pedals for
2 overseas consumers, Toyota's misinformation to United States consumers continued.
3 TMC posted the following response to a question posed by the LOS ANGELES TIMES:

4 Q2: Toyota has conducted numerous recalls related to
5 sudden acceleration over the past decade in the U.S.
6 and Canada, including two previous floor mat recalls.
7 But the problem has continued. Does this mean that
8 the previous recalls were not successful in eliminating
9 the problems and if so, why not? In particular, why
10 wasn't the 2007 recall of Lexus ES and Camry floor
11 mats effective in preventing catastrophic accidents
12 such as the Saylor case?
13

14 A. Toyota has conducted two all-weather floor mat
15 (AWFM) recalls after receiving reports that if the
16 floor mat (either by itself, or if it is placed on top of an
17 existing carpeted floor mat) is not secured by the
18 retaining hooks, the mat can move forward and
19 interfere with the accelerator pedal returning to the
20 idle position. If the mat is properly secured, it will not
21 interfere with the accelerator pedal.
22

23 As reported in the law enforcement investigation, the
24 floor mat in the Saylor accident was not only
25 improperly secured, it was incompatible and incorrect
26
27
28

1 for the vehicle. The recall recently announced
2 addresses the fact that incompatible floor mats, or
3 multiple floor mats could be installed and that the
4 remedy must address that possibility.
5

6 281. When Transportation Secretary Ray LaHood testified before the House
7 Sub-Committee in regard to the Toyota recalls, he explained that NHTSA officials
8 chose to meet directly with Toyota executives in Japan to discuss safety issues
9 because NHTSA “felt that maybe the people in Japan were a little bit safety deaf.”
10

11 **5. The sticky accelerator recall**

12 282. The sticky pedal recall is illustrative of Toyota’s concealment of
13 material facts relating to SUA defects.

14 283. Toyota received a Field Technical Report (“FTR”) in July 2006 from a
15 US-based owner of a Toyota Avalon regarding a sticking accelerator pedal. Toyota
16 began receiving FTRs in 2007 concerning US-based claims of accelerator pedals in
17 Tundra vehicles and other Toyota models that were slow to return to the idle position
18 when released by the driver of the vehicle. The FTRs submitted to Toyota in 2007
19 included claims of pedals that got stuck in a depressed position and were slow to
20 return to idle.
21

22 284. In January 2008, Toyota allegedly determined that the friction lever
23 component of accelerator pedals manufactured using a plastic material identified as
24 “PA46” could cause the accelerator pedal to be slow to return to idle in high
25 humidity and temperature environments. In January 2008, Toyota issued an
26 Engineering Change Instruction (“ECI”) to CTS to change the composition of the
27 type of plastic used for the Tundra friction lever from PA46 to PPS.
28

1 285. Toyota also received four FTRs from the European market in 2008.
2 Secretly, after more complaints and further study, by June 2009, Toyota had
3 determined that the issue of sticking accelerator pedals was not alleviated by
4 changing the friction lever material to PPS. Toyota and CTS reviewed possible
5 countermeasures and “settled” on a second change to the composition of the friction
6 lever (from PPS to POM) and lengthening the friction lever. In May 2009, Toyota
7 developed Engineering Change Instructions regarding sticking accelerator pedals on
8 right-hand drive Argo and Yaris vehicles in the United Kingdom (U.K.). No
9 disclosure of this issue was made to prior purchasers.
10

11 286. On June 15, 2009, Toyota initiated a Technical Instruction to Toyota
12 distributors in the U.K. and Ireland identifying a temporary field fix involving
13 replacement of the CTS pedal with a field-modified Denso pedal as advised in the
14 Technical Instruction. In July 2009, Toyota decided to implement a rolling design
15 change for CTS pedals starting with right-hand-side drive vehicles in Europe, and
16 stated that it planned to “commonize the friction lever in pedals used in other
17 markets, including the United States.”
18

19 287. As noted, on September 29, 2009, Toyota issued a Technical Instruction
20 to Toyota distributors in 31 European countries, including Austria, Belgium, Cyprus,
21 the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Holland,
22 Hungary, Iceland, Ireland, Israel, Italy, Malta, Norway, Poland, Turkey, Portugal,
23 Russia, Slovenia, Spain, Sweden, Switzerland, Ukraine, the U.K., Georgia,
24 Kazakhstan, and Romania. The Technical Instruction identified a production
25 improvement and repair procedure to address complaints by customers in those
26 countries of sticky accelerator pedals, sudden engine RPM increases and/or sudden
27 countries of sticky accelerator pedals, sudden engine RPM increases and/or sudden
28

1 vehicle acceleration. No disclosure of this TI was made to consumers or regulators
2 in the U.S.

3 288. Also in September 2009, Toyota confirmed that a sticky
4 accelerator complaint originating from a Toyota Matrix owner in Arizona was
5 caused by the same phenomenon as the sticky accelerator pedals on the Yaris and
6 Argo vehicles in the U.K. Toyota continued to receive FTRs regarding sticking
7 accelerator pedals from its customers in the United States throughout the remainder
8 of 2009. On October 7, 2009, Toyota issued an Engineering Change Instruction
9 #414WF1429 ("ECI 1429") in the U.S. for the accelerator pedal of the RAV4 for the
10 same design change for the CTS pedal as implemented in Europe. Not only did
11 Toyota fail to inform NHTSA of this safety-related defect, but it secretly withdrew
12 ECI 1429 for the RAV4 before it was implemented, and deliberately sought to
13 conceal any record of its original decision to implement ECI 1429. On October 21,
14 2009, Takeshi Shirai, Assistant Manager, TMC PPM initiated a phone call with
15 Mark Riester, Specialist, TEMA PPM, and instructed Riester not to implement
16 ECI 1429. *Shirai specifically instructed Riester to call both the supplier, CTS, and*
17 *the manufacturing facility, TEMA, by phone, and not to send an email or write down*
18 *the changed instruction.* Riester carried out Shirai's instruction, and ensured all his
19 communications with CTS and TEMA were verbal, and no record was made. .
20 Toyota continued to conceal the decision to cancel ECI1429 by issuing a new ECI
21 for the RAV4 relating to the accelerator pedal, the effect of which was to cancel
22 ECI 1429 while making no reference to it.

23 289. NHTSA subsequently conducted an investigation into Toyota's
24 violation of the Safety Act in failing to timely notify NHTSA of the safety-related
25

1 defect with the CTS accelerator pedal. While the investigation uncovered that
2 Toyota “inexplicably” gave an instruction not to implement the ECI, Toyota did not
3 disclose any aspect of its deliberate concealment of the instruction not to implement,
4 and NHTSA remained unaware of the concealment when it resolved to settle the
5 violation by Toyota’s payment of statutory civil penalties without any further action.
6 Internally Toyota was acknowledging that it had concealed the sticky pedal defect:
7

8 In a report to NHTSA, we said that according to our
9 investigation in Europe, returning of the pedal from a small
10 opening angle is slightly slow, but no accidents occurred.
11 This is different from the fact.
12

13
14 Last year, the situation in Europe (many reports on sticky
15 pedals and accidents, TITS9-161 were issued on 10/1/2009
16 was not reported to NHTSA.
17

18 290. On January 16, 2010, Katsuhiko Koganei (a.k.a. “Kogi”), TMS
19 Executive Coordinator – Corporate Communications, sent an e-mail to Mike Michels
20 at Toyota, stating “we should not mention about the mechanical failures of acc. [sic]
21 pedal, because we have not clarified the real cause of the sticking accelerator pedal
22 formally, and the remedy for the matter has not been confirmed.”
23

24 291. The e-mail came three days before a meeting scheduled with (among
25 others) Toyota’s two lead North American executives, James Lentz (Torrance, CA)
26 and Yoshimi Inaba (New York, NY), and NHTSA. It was copied to at least 15 other
27 Toyota Executives, including Irv Miller (Torrance, CA), TMS Group Vice President,
28 Environmental and Public Affairs.

1 292. On January 16, 2010, Irv Miller sent an e-mail to Koganei stating:
2 I hate to break this to you but WE HAVE A tendency for
3 MECHANICAL failure in accelerator pedals of a certain
4 manufacturer on certain models. We are not protecting our
5 customers by keeping this quiet. The time to hide on this
6 one is over. We need to come clean and I believe that Jim
7 Lentz and Yoshi are on the way to DC for meetings with
8 NHTSA to discuss options.
9

10
11 We better just hope that they can get NHTSA to work with
12 us in coming with a workable solution that does not put us
13 out of business.⁵³
14

15 293. Not until January 19, 2010, two days before initiating its safety-related
16 recall on the sticky pedal issue, did Toyota meet with NHTSA (at NHTSA's request)
17 to describe and discuss the sticky pedal phenomenon in Europe and the United
18 States. Toyota continued to sell vehicles containing a safety related defect between
19 initiation of its European action on September 29, 2009, and its stop sale order issued
20 in the United States on January 26, 2010.
21

22 294. When a motor vehicle manufacturer learns that its vehicles contain a
23 defect and decides in good faith that the defect relates to motor vehicle safety, it is
24 required to notify NHTSA and the owners, purchasers, and dealers of the vehicle of
25 the safety-related defect. 49 U.S.C. § 30118(c). A manufacturer incurs its duties to
26

27
28 ⁵³ TOY-MDLID00027481.

1 notify and remedy whether it actually determined, or it should have determined, that
2 its vehicles are defective and the defect is safety-related. Notification required under
3 § 30118 must be given within a reasonable time after the manufacturer first decides
4 that a safety-related defect or noncompliance exists under section § 30118(c). 49
5 U.S.C. § 30119(c)(2). Under applicable regulations, the manufacturer must notify
6 NHTSA within five business days of making a safety-related defect determination.
7 49 C.F.R. § 573.6(a), (b). Violations of 49 U.S.C. § 30119 subject the manufacturer
8 to civil penalties. 49 U.S.C. § 30165(a).
9

10 295. Toyota's initiation of the sticky pedal recall was untimely under the
11 Safety Act. Among other things, on September 29, 2009, Toyota initiated an action
12 on European vehicles equipped with CTS accelerator pedals manufactured from
13 PA46 and/or PPS plastic. Toyota knew or should have known at all relevant times
14 that a significant number of its vehicles sold in the United States (approximately 2.3
15 million vehicles) were equipped with the same or materially similar CTS accelerator
16 pedals. Nonetheless, Toyota failed to take any action to remedy the issue in the
17 United States until January 21, 2010 – a delay of almost four months.
18
19

20 296. Secretly, while it was interacting with NHTSA on pedal and floor mat
21 issues, Toyota was investigating SUA events observed by its own employees in
22 Toyota vehicles they were driving:

23 Jason,

24 Here is the summary of events.

25 Went across Buffalo Bridge, stopped & turned left on 35.

26 Went across bridge and started up the hill.

27 Briefly accelerated at W.O.T. for down shift.
28

1 Let off throttle & vehicle continued to accelerate.
2 Depressed brake (thinking something was wrong with
3 cruise control)
4 No change vehicle continued to accelerate.
5 Depressed brake peddle hard, vehicle continued to pull.
6 Shifted to Neutral and engine revved to rev limiter.
7 Not for certain what occurred to get the throttle back to
8 normal condition, but I did move my foot around the
9 accelerator & brake pedal after the vehicle was in Neutral
10 & acceleration stopped.
11 David Kovich
12 Customer Quality Engineering (CQE-CIN), Quality
13 Division
14
15

16 297. While Toyota executives were claiming the defect was due to pedal
17 entrapment dealers believed otherwise:⁵⁴

18 I'm afraid that many of us in the dealer body feel
19 embarrassed and not a little ashamed regarding a
20 perception that we may have been used to faithfully
21 endorse the (apparently inaccurate) party line that the only
22 customer concerns have been as a result of pedal
23 entrapment. While I'm sure that this was never Toyota's
24 intent, there is a palpable feeling somewhere between
25
26
27

28 ⁵⁴ TOY-MDLID00015943.

1 disappointment and betrayal at the retail level. As you
2 know, this would be best addressed by a prompt, effective
3 cure for customer concerns.
4

5
6 The other thought is that it was not the Watergate break-in
7 that brought down President Nixon; it was the aftermath.

8 Please help us with your endorsement that all
9 communications be frank, complete, and 100% accurate.

10 298. Toyota continued to receive reports from qualified engineers opining
11 about the abnormalities in the ECTS and SUA events not caused by pedals or mats.
12 For example, on January 28, 2009 a Professional Engineer examined a 4Runner
13 that.⁵⁵
14

15 According to the driver of the vehicle, she had driven the
16 4Runner earlier in the day of the incident. She stated that
17 when she started the vehicle, placed the gear selector lever
18 in the reverse and depressed the accelerator pedal, the
19 vehicle accelerated rearward in an uncontrolled manner.
20 The vehicle traveled down her driveway, crossed a road,
21 struck a stump and entered a stream. The vehicle came to
22 rest on its driver side. She exited the vehicle through the
23 sun roof. She stated that she had never had any drivability
24 issues with the 4Runner.
25
26

27
28 ⁵⁵ TOY-MDLID90053224.

1 299. The report concluded:

2 Based on the foregoing observations and analysis, the
3 following are my opinions, to a reasonable degree of
4 engineering certainty, regarding the condition and
5 operation of the Toyota 4Runner.
6

7 * * *

8 Third, the voltages associated with the throttle position
9 sensor malfunction detection (w/ pedal depressed) and the
10 accelerator pedal position sensor for engine control (w/
11 pedal depressed) were not within specifications. The
12 voltage deviations indicate that the electronic throttle
13 control system featured abnormalities. The inability to
14 start the vehicle precluded testing the functional operation
15 of the system.
16

17 300. Similarly, on January 26, 2010, a Field Technical Report involving a
18 2009 Corolla confirmed a customer complaint that the vehicle “tried to take off”:⁵⁶
19

- 20 • Technician who was inspecting the vehicle had driven it
21 approximately 10-12 minutes.
- 22 • 7-8 minutes into the drive the technician was sitting at a
23 stop light. When the stop light changed the tech started
24 to lightly accelerate.
25

26
27

28 ⁵⁶ TOY-MDLID00075242.

- After traveling 20-30 feet the vehicle exhibited a slight hesitation then began to accelerate on its own.
- Engine speed was estimated to have gone from 1500 rpm to 5500 rpm at the time of the occurrence.
- Vehicle traveling 9-10 mph at time of occurrence. Approximately maximum speed reached was 20 mph prior to accelerator pedal release / brake application.
- Estimated throttle position at the time of the occurrence was 15-20 percent.
- No accessories were on at the time of occurrence.
- DTC U0100 was set in memory, but the technician cleared the DTC prior to duplication and the DTC did not return following duplication.
- The technician experienced a problem with the scan tool losing communication with the car at the time of the occurrence. The scan tool in use was a newer unit to the dealer. It is unknown if this was related to the vehicle concern or solely a scan tool concern.

301. The FTR concluded the cause was “unknown,” hence neither the mat or pedal recalls would be effective and Toyota repurchased the vehicle. Although the technician duplicated the condition the “national” and regional offices of Toyota were supposedly unable to do so.

302. Secret replication of SUA by Toyota also occurred with a 2007 Camry. The owner reported that with the foot off the pedal the RPM went up to 5,000 and

1 the speed increased to 60-62 mph. Using a similar vehicle the Toyota team
2 replicated an increased in rpm and vehicle speed with “no” pedal application.
3 Though the team apparently blamed this on a “downhill condition,” a vehicle should
4 not have increased rpm due to going downhill.”⁵⁷

5
6 303. Toyota was careful to make certain it would be difficult to discover
7 what it knew about the SUA defect, which models were effected and which
8 managers were involved. Employees were instructed to disguise emails:

- 9
- 10 • When you send a mail to somebody outside the
11 company, drop cc to your boss.[]
12 Check the subject/text/attachment(*)
13 *Any emails from Quality Control Department are
14 basically “confidential.”
 - 15 • Put “Secret” and “Don’t forward” in the beginning
16 of every email (including reply and forward.) []
 - 17 • Do not include both project code and car names. []
 - 18 • Attached documents (prepared by your department
19 or other department) should be classified. []
 - 20 • When you reply to emails, generally delete the
21 tracking record and attachment. []

22
23 masato_kosugi@mta.mx.toyota.co.jp on 1/26/2010

24 20:13:39
25
26
27

28 ⁵⁷ TOY-MDLID00079756.

304. On or about April 19, 2010, TMC agreed to pay NHTSA's then record \$16.375 million fine, and avoided any official findings of fact by NHTSA. TMC admits that it "could have done a better job of sharing relevant information within our [Toyota's] global operations and outside the company ..."

D. Toyota's Internal Death by SUA Chart

305. Throughout the years Toyota received reports covering various Toyota models detailing incidents involving deaths due to SUA. Belatedly, in February 10, 2010, Toyota assembled these reports into what is in effect an internal death by SUA chart:

MODELTEXT	YEARTXT	FAILDATE	CDESCR
SIENNA	2007	20070811	ON AUGUST 11, 2007, MY FAMILY EXPERIENCED A HEAD ON COLLISION. WE WERE DRIVING A 2007 TOYOTA SIENNA. MY HUSBAND WAS DRIVING AND DIED AT THE SCENE. THE INVESTIGATION NEVER FOUND ANY REASON FOR THE CAUSE OF THE ACCIDENT. MY HUSBAND CROSSED THE CENTER LINE WHILE GOING ROUND A SLIGHT CURVE. HE WAS 47, POOR WEATHER WAS NOT ISSUE. IF THE ACCELERATOR ON THE SIENNA MALFUNCTIONED AND DID NOT RESPOND, THAT COULD DEFINITELY BE A FACTOR. OUR VAN HAD LESS THAN 3000 MILES ON IT. WE PURCHASED IN MAY 11, 2007. THE AUTOPSY FOR MY HUSBAND CAME BACK NEGATIVE FOR ANY MEDICAL CONDITION CONCERN. PLEASE INVESTIGATE OUR ACCIDENT REPORT AND BE SURE THE SAFETY AND RELIABILITY OF SIENNAS IS SOUND.
GX470	2003	20090206	I WAS TRAVELING WEST ON A TWO LANE PAVED ROAD (SUTTON ROAD) NEAR SUTTON SCHOOL. WEATHER WAS SNOWING AND ROAD CONDITIONS SLIPPERY WHEN MY ACCERERATOR FAILED TO RETURN TO IDLE POSITION. I APPLIED BRAKES AS I WAS APPROACHING A VEHICLE IN FRONT OF ME TRAVELING IN THE SAME DIRECTION. THE ELECTRONIC STABILITY CONTROL FAILED TO MAINTAIN STRAIGHT DIRECTION AS PER DESIGN INTENT AND MANUALS. FRONT BEGAN SLIDING TO LEFT AND REAR OF VEHICLE BEGAN SLIDING TO RIGHT. I NCREASED BRAKE PRESSURE AND STEERED INTO TH SKID , TO THE RIGHT. I WAS ABLE TO MISS THE CONTACT WITH ANY OTHER VEHICLES AND OR DAMAGE ANY PROPERTY , BUT DID END UP SLIDING INTO A DITCH OFF OF THE ROAD. WITH THE IMPACT RESULTING IN THE DEATH OF MY SERVICE DOG . AS I AM HANDICAPPED. NO DAMAGE TO MY VEHICLE , BUT NO I AM VIRTUALLY IMMOBILE WITH THE LOSS IF MY DEAR SERVICE DOG.
PRIUS	2005	20091022	OUR SON WAS KILLED ON OCT 22ND IN A SINGLE CAR CRASH WHILE DRIVING A 2005 TOYOTA PRIUS(THE POLICE REPORT STATES THAT HE LOST CONTROL, JUMPED THE CURB AND DIED IN THE ENSUNG CRASH) WHILE NEGOTIATING A CURVE WHILE ATTEMPTING TO ENTER THE FREEWAY IN TUCSON AZ. WE STRONGLY BELIEVE THAT THIS MAY HAVE BEEN CAUSED BY SUDDEN ACCELERATION AND OR BREAK PROBLEMS. I KNOW THIS IS AN OLDER MODEL, BUT IN LIGHT OF TOYOTA'S LIES AND COVERUPS TIME WILL ONLY TELL.

MODELTX	YEARTXT	FAILDATE	CDESCR
SCION TC	2007	20090811	2007 SCION TC SET ON CRUISE AT 70 MPH CRASHED INTO GUARDRAIL ON HIGHWAY. MY SON WAS DRIVING AND HE DOES NOT REMEMBER THE CAUSE OF THE ACCIDENT BUT STATE POLICE ACCIDENT RECONSTRUCTION CLAIM CAR HIT THE GUARDRAIL AT A SPEED IN EXCESS OF 100 MPH UPON CRASH. CRASH SEVERLY INJURED MY SON AND KILLED HIS CHILDHOOD FRIEND. TWO THINGS ARE KNOWN FOR CERTAIN, DRIVER CLAIMS CAR WAS ON CRUISE AND ACCIDENT REPORT STATES SPEED OVER 100 MPH. THE CRASHES ON THESE CARS ARE OVERLOOKED BECAUSE MOSTLY TEENAGERS AND YOUNG ADULTS ARE BUYING THEM AND OFFICIALS AND INSURANCE COMPANIES BLAME ACCIDENTS ON DRIVER INEXPERIENCE.
4RUNNER	1992	19920303	A 1992 TOYOTA 4-RUNNER WAS PURCHASED AND WE ONLY HAD IT FOR TWO WEEKS. THE TRUCK WAS DRIVEN TO WEST VIRGINIA. THE NEXT DAY THE TRUCK SUDDENLY ACCELERATED AT A HIGH SPEED AND WHEN THE BRAKES WERE APPLIED IT WOULD NOT STOP. IT CRASHED AND FLIPPED OVER. MY HUSBAND DIED IN THAT TRUCK. THERE WAS A LAW SUITE BUT IT NEVER WENT TO COURT AFTER FIVE YEARS. MY LAWYERS GAVE UP. TOYOTA NEVER SETTLED WITH ME AND ONLY SAID IT WAS DRIVER ERROR. THE ENGINEER WHO WAS ON THE CASE SAID THERE WAS A DESIGN DEFECT BUT THEY COULD NOT PROVE IT. SEE ALSO ODI 10121117 *DSY *TR
HIGHLANDER	2008	20091130	TL* THE CONTACT'S SISTER OWNS A 2008 TOYOTA HIGHLANDER. THE CONTACT'S SISTER WAS DRIVING AND THE VEHICLE ACCELERATED ACROSS THE INTERSTATE, HIT AN EMBANKMENT AND THEN WAS HIT BY A TRUCK. THE VEHICLE BURNED AND THE DRIVER WAS KILLED AS A RESULT OF THE ACCIDENT. THE VEHICLE WAS DESTROYED BUT THERE WAS NO INVESTIGATION INTO THE CAUSE FOR THE ACCIDENT. THE CONTACT CALLED THE MANUFACTURER BUT WAS NOT ABLE TO GET IN TOUCH WITH ANY REPRESENTATIVES. THE CURRENT AND FAILURE MILEAGES WERE APPROXIMATELY 33,000.
TACOMA	2008	20100126	TOYOTA TACOMA 2008 PLEASE STUDY THIS ACCIDENT. IT MAY RELATE TO THE GAS PEDAL, SO LET TOYOTA KNOW TO RECALL THIS MODEL TOO SO TO PREVENT AN ANOTHER FATAL ACCIDENT LIKE MY BROTHER HAD. *TR
SOLARA	2004	20090928	ON SEPTEMBER 28, 2009 MY MOTHER WAS DRIVING HER 2004 TOYOTA SOLARA AND HAD AN ACCIDENT. THE CAR JUMPED THE CURB, HIT A TREE, A LAMP POST, AND CRASHED INTO A STONE SIGN. SHE WAS TAKEN TO THE HOSPITAL WHERE THEY FOUND A LARGE BRUISE ON HER ARM. THE DOCTORS SENT HER FOR A SCAN RIGHT AWAY, BUT SHE HAD A STROKE AND NEVER RECOVERED. SHE DIED FOUR DAYS LATER. I REALIZE THAT THE CURRENT TOYOTA ACCELERATOR RECALL DOES NOT INVOLVE THE SOLARA AT THIS TIME, BUT OUR FAMILY IS NOW SUSPICIOUS. A CAUSE OF MY MOTHER'S ACCIDENT HAS NOT BE DETERMINED. SHE DIED BEFORE THE POLICE WERE ABLE TO ASK HER ABOUT THE ACCIDENT. THE CAR IS STILL SMASHED UP AND HAS NOT BEEN REPAIRED. SHOULD WE INVESTIGATE THIS MATTER FURTHER? TW*
HIGHLANDER	2005	20091013	TOYOTA HIGHLANDER 2005. PETERBORO , NH. 11 AM. DRIVER WAS REPORTED TO PASS VEHICLE ON RIGHT IN BREAK DOWN LANE, THEN TRIED TO PASS ANOTHER CAR BY GOING INTO LEFT LANE AND HIT ONCOMING VEHICLE. FOUR PEOPLE KILLED. DRIVER WAS VERY EXPERIENCED --EXCELLENT SAFETY RECORD. I HAD BEEN IN HIS CAR WITH HIM HUNDREDS OF TIMES. VERY SAFE DRIVER --NO COWBOY. BELIEVE CAR HAD UNCONTROLLED ACCELERATION. *CN
CAMRY	2007	20080412	TL* THE CONTACT OWNED A 2007 TOYOTA CAMRY LE. WHILE DRIVING THE ACCELERATOR PEDAL BECAME ENTRAPPED BY THE FLOOR-MAT. AS A CONSEQUENCE HE CRASHED INTO ANOTHER VEHICLE. THE DRIVER OF THE OTHER VEHICLE WAS KILLED. BOTH VEHICLES CAUGHT ON FIRE. THE FAILURE AND CURRENT MILEAGES WERE UNKNOWN. THE VEHICLE IDENTIFICATION NUMBER WAS UNAVAILABLE.

MODELTX	YEARTXT	FAILDATE	CDESCR
IS250	2006	20090410	TL* THE CONTACT OWNS A 2006 LEXUS IS250. WHILE DRIVING THE VEHICLE RAPIDLY INCREASED ITS SPEED UP TO 90 MPH . HE ATTEMPTED TO REMOVE THE FLOOR- MAT FROM UNDER THE ACCELERATOR PEDAL. HOWEVER, THE VEHICLE VEERED OFF OF THE ROAD AND THEN INTO A DITCH. WHEN THE VEHICLE ROLLED OVER, ONE OCCUPANT WAS EJECTED FROM THE FRONT SEAT; SINCE HE WAS NOT WEARING A SEAT BELT. THE OTHER THREE PASSENGERS HAD BRUISES LACERATIONS, AND WERE HOSPITALIZED. THE VEHICLE WAS COMPLETELY DESTROYED. A POLICE REPORT WAS AVAILABLE. THE FAILURE MILEAGE WAS 24,000.
AVALON	2001	20070409	LET ME EXPLAIN FIRST, I CAN'T SUBSTANTIATE THE CLAIM I AM MAKING ABOUT THE POSSIBLE CAUSE OF THE ACCIDENT THAT KILLED MY WIFE WHEN DRIVING A 2001 TOYOTA AVALON. THE REASON THE ACCIDENT OCCURRED IS THAT SHE DID NOT STOP AT AN INTERSECTION CONTROLLED WITH A STOP SIGN. THE ACCIDENT OCCURRED IN CALLAHAN COUNTY, TEXAS AT THE INTERSECTION OF FM 1750 AND HIGHWAY 36 ON APRIL 9, 2007 AT APPROXIMATELY 8:30PM. SHE DROVE UNDER THE TRAILER OF AN 18 WHEELER, WAS KILLED INSTANTLY AND DRAGGED UNDER THE TRAILER FOR 800 TO 900 FIT. IT TOOK THE ABILENE FIRE DEPARTMENTS EXPERTISE TO REMOVE HER BODY FROM THE WRECKAGE. THE LOCAL VOLUNTEER FIRE DEPARTMENTS DID NOT WANT TO ATTEMPT IT. THERE WERE NO SKID MARKS. SHE HAD DRIVEN THIS ROUTE COUNTLESS TIMES AND WAS AWARE OF THE STOP SIGN. I CHECKED CELL PHONE RECORDS AND THERE WAS NO EVIDENCE THAT SHE COULD HAVE BEEN ON THE PHONE. ADMITTEDLY SHE WAS UPSET. SHE WAS DRIVING FROM ABILENE TO MEXIA, TEXAS TO BE WITH HER ELDERLY MOTHER WHO WAS IN A DIABETIC COMA WHEN SHE LAST SPOKE TO SOMEONE. HOWEVER RAY ANN WAS A GOOD DRIVER. I CAN'T BELIEVE THAT SHE WAS SO DISTRACTED TO ALLOW THIS TO HAPPEN. IN LIGHT OF THE RECENT RECALL BY TOYOTA, I BELIEVE THAT HER AVALON SUDDENLY ACCELERATED OUT OF CONTROL. NO SKID MARKS WERE AT THE SCENE ONLY CUTOUTS IN THE PAYMENT THAT WERE CAUSED BY HER CAR AS IT WENT UNDER THE TRAILER. WHY NO SKID MARKS? AS SHOWN ON CONSUMER REPORT INTERNET VIDEO, THE BRAKES ARE NOT ABLE TO SLOW THE CAR DOWN AS IT IS ACCELERATING AND SKID MARKS WOULD NOT HAVE BEEN POSSIBLE. THERE IS NO OTHER EXPLANATION IN MY MIND AS TO HOW RAY ANN COULD HAVE MISSED THE STOP SIGN. THE CAR WAS OUT OF HER CONTROL AND IT KILLED HER. IF YOU WOULD LIKE TO HAVE THE VIN, PLEASE CONTACT ME. I WILL PULL IT OUT OF THE RECORDS I HAVE. THANK YOU FOR YOUR CONSIDERATION AND ANY RESPONSE. THIS IS SUCH A TRAGEDY THAT UNTIL THE RECALL LEFT ME WITHOUT ANY EXPLANATION THAT WAS BELIEVABLE. I NOW BELIEVE I KNOW WHAT HAPPENED. *TR
CAMRY	2005	20090804	TL* THE DRIVER OWNS A 2005 TOYOTA CAMRY. HER SON IN LAW, WHILE DRIVING, WAS KILLED IN A VEHICLE CRASH. THE POLICE REPORT STATES THAT THE VEHICLE WAS SPEEDING AND THAT THE DRIVER COULD NOT CONTROL THE VEHICLE. SHE FILED A COMPLAINT WITH TOYOTA MANUFACTURER REGARDING UNINTENDED VEHICLE ACCELERATION. THE FAILURE MILEAGE WAS 45,000. THE VIN NUMBER WAS UNKNOWN.
CAMRY	2007	20090527	HIGH SPEED COLLISION INVOLVING A 2007 TOYOTA CAMRY. DRIVER WAS FAMILIAR WITH ROAD AND WAS NOT KNOWN TO DRIVE AGGRESSIVELY OR SIGNIFICANTLY ABOVE SPEED LIMIT. TOXICOLOGY REPORTS CAME BACK NEGATIVE. DRIVER HAD BIPOLAR DISORDER AND WAS DRIVING SELF TO HOSPITAL, BUT THERE WAS NO INDICATION AT ALL OF SUICIDAL BEHAVIOR/INTENT. POLICE REPORT PUT RATE OF SPEED AT TIME OF COLLISION AT LEAST 85 MPH. CONVERSATIONS WITH INVESTIGATORS INDICATE THAT SEVERITY OF COLLISION INDICATES SPEED MAY HAVE BEEN 100MPH. POSTED SPEED WAS APPROXIMATELY 40MPH. *TR

MODELTX	YEARTXT	FAILDATE	CDESCR
ES350	2009	20090828	ON AUGUST 28, 2009, FOUR OCCUPANTS OF A 2009 LEXUS ES350 TRAGICALLY AND UNNECESSARILY DIED IN SANTEE, CALIFORNIA IN SAN DIEGO COUNTY FOLLOWING A HIGH SPEED LOSS OF CONTROL AND ROLLOVER EVENT. THE VEHICLE IN QUESTION WAS A LOANER CAR FROM BOB BAKER LEXUS IN EL CAJON, CALIFORNIA. DRIVER OF THE VEHICLE, 45, A 19 YEAR VETERAN OF THE CALIFORNIA HIGHWAY PATROL. THE DRIVER HAD OBTAINED THE VEHICLE THAT DAY AFTER DROPPING OFF HIS LEXUS FOR SERVICE. WITNESSES REPORT THAT THE OFFICER WAS MANEUVERING THE LEXUS IN AND OUT OF TRAFFIC AT HIGH RATES OF SPEED ON STATE ROUTE 125, HONKING HIS HORN WITH THE HAZARD LIGHTS ON, PRIOR TO THE HIGHWAY ENDING AT AN INTERSECTION. THE OFFICER ATTEMPTED TO NEGOTIATE A TURN BUT COULD NOT AVOID STRIKING ANOTHER VEHICLE AND LOSING CONTROL BECAUSE OF HIS HIGH RATE OF SPEED. THE VEHICLE LOST CONTROL, ROLLED SEVERAL TIMES, AND CAUGHT FIRE. ALL FOUR OCCUPANTS ARE REPORTED TO HAVE DIED ALMOST IMMEDIATELY. PRIOR TO ENTERING THE INTERSECTION, AN OCCUPANT OF THE VEHICLE CALLED 911 EMERGENCY TO REPORT THAT THE ACCELERATOR WAS STUCK. HE REPORTED THAT THE VEHICLE WAS TRAVELING 120 MILES PER HOUR AND THAT THEY WERE APPROACHING AN INTERSECTION. OCCUPANTS ARE HEARD TELLING EACH OTHER TO PRAY BEFORE A WOMAN SCREAMS AND THE CALL SUDDENLY ENDS. THE OFFICER(DRIVER OF THE VEHICLE, HIS WIFE , 45, AND THEIR 14 YEAR OLD DAUGHTER ALL DIED IN THE CRASH. THE WIFE'S BROTHER, 38, ALSO DIED. ON BEHALF OF THE SURVIVING FAMILY MEMBERS OF THE DECEDENTS, WE RESPECTFULLY REQUEST YOU TO INVESTIGATE WHY THIS LEXUS VEHICLE'S ACCELERATOR MALFUNCTIONED, AND WHY A HIGHLY-TRAINED OFFICER AND DRIVER LIKE THE OFFICER WAS UNABLE TO RE-GAIN CONTROL OF THE LEXUS VEHICLE AT ISSUE OR OTHERWISE AVOID CATASTROPHE. WE CURRENTLY ARE AWAITING ADDITIONAL FACTS SURROUNDING THE INCIDENT, AND THE MALFUNCTION OF THE LEXUS, BUT WILL SUPPLEMENT THIS COMPLAINT UPON RECEIPT. *TR UPDATED 12/01/09 *BF UPDATED 12/01/09
ES330	2006	20080826	TL*THE CONTACT OWNS A 2006 LEXUS ES330. WHILE MERGING INTO THE RIGHT LANE AT APPROXIMATELY 25 MPH, THE VEHICLE SUDDENLY ACCELERATED. THE CONTACT WAS UNABLE TO BRAKE AND STRUCK A PEDESTRIAN. THE PEDESTRIAN DIED DUE TO INJURIES. THE CONTACT ALSO REAR ENDED TWO OTHER VEHICLES AND DROVE THROUGH A FENCE. THE VEHICLE CAME TO A STOP WHEN IT CRASHED INTO A GUARD RAIL. THE MANUFACTURER STATED THAT THE CAUSE OF THE FAILURE COULD HAVE BEEN THE FLOORMATS. THE INSURANCE COMPANY CLAIMED THAT THE VEHICLE WAS DESTROYED. THE CONTACT RECEIVED INJURIES TO HER BACK, NECK, AND LEG. TWO OTHERS WERE ALSO INJURED. STATE POLICE REPORT NUMBER 5271887 WAS FILED. THE FAILURE AND CURRENT MILEAGES WERE 26,286. UPDATED 10/01/08. *LJ THE MANUFACTURER STATED THE FLOOR MATS MAY HAVE BECOME STUCK UNDER THE ACCELERATOR WHICH CAUSED THE VEHICLE TO ACCELERATE OUT OF CONTROL. UPDATED 10/08/08. *JB
TUNDRA	2007	20080220	TL*THE CONTACT OWNED A 2007 TOYOTA TUNDRA. WHILE THE CONTACT'S HUSBAND WAS DRIVING AT AN UNKNOWN SPEED, THE VEHICLE ACCELERATED BETWEEN APPROXIMATELY 80-100 MPH, CRASHED INTO A TREE AND THE DRIVER WAS KILLED. THE VEHICLE WAS DESTROYED. THE CONTACT BELIEVED THAT THE CRASH WAS RELATED TO THE RECALL ABOUT THE AFTERMARKET ALL WEATHER FLOOR MATS BECOMING STUCK AND CAUSING THE VEHICLE TO ACCELERATE. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE APPROXIMATELY 35,000. UPDATED 03-11-08 *BF

MODELTX	YEARTXT	FAILDATE	CDESCR
CAMRY	2004	20040314	MY MOTHER AND FRIEND STARTED OUT FOR CHURCH, THE FRIEND HAD COME TO PICK HER UP WHEN THE 2004 TOYOTA CAMRY WITH LESS THAN 3000 MILES ON IT WAS HAVING DIFFICULTY SHIFTING INTO REVERSE, THEN WHEN SHE SHIFTED INTO DRIVE THE CAR ACCELERATED UNCONTROLLABLY EST SPEED ON 80 - 92 MILE A HOUR IN LESS THAN 250 FT WHEN THE CAR HIT A MOBILE HOME. THEY HIT SO HARD IT MOVED DOUBLE WIDE ALMOST A FOOT. KILLING MY MOTHER THE PASSENGER AND INJURY TO HER FRIEND THE DRIVER. NO AIR BAG DEPLOYED AND WHEN TOYOTA WAS CONTACTED THEY REFUSED TO SPECK TO US. ATTORNEYS HAVE SAID THAT TOYOTA IS SO BIG, NOT COST AFFECTIVE....SO I WATCH AND IN TWO YEARS THERE ARE MANY MANY MORE NOW....HOW MANY MORE HAVE TO DIE BEFORE SOMETHING IS DONE. SEE ALSO 10074472. *DSY *NM
AVALON	2003	20041109	MY MOTHER-IN-LAW WHO ALWAYS WORE HER SEAT BELT WAS DRIVING HOME AT NIGHT AND SOMEHOW RAN OFF THE ROAD HIT A LITTLE CHERRY TREE AND WAS THROWN FROM HER CAR & KILLED HER. THE SIDE NOR THE FRONT AIR BAGS WENT OFF. AND APPARENTLY THE SEAT BELTS FAILED TOO. THE HIGHWAY PARTROL CAN'T FIGURE OUT WHAT HAPPENED.*AK
CAMRY	2003	20040315	WHILE IN A PARKING LOT AND BACKING OUT OF A PARKING SPACE VEHICLE ACCELERATED SUDDENLY HITTING A PEDESTRIAN. *AK ONE PERSON WAS INJURED AND ONE PERSON WAS KILLED IN THIS ACCIDENT. THE CONSUMER REFUSED TO DRIVE THE VEHICLE AFTER THIS INCIDENT AND RETURNED THE VEHICLE TO THE DEALER. *NM
CAMRY	2004	20040314	DIFFICULTY SHIFTING FROM PARK TO REVERSE, THEN UPON SHIFTING INTO DRIVE THE CAR ACCELERATED UNCONTROLLABLY, WOULD NOT STOP, COLLIDED WITH A MOBILE HOME, AIR BAGS DID NOT DEPLOY, RESULTING IN THE DEATH OF ONE PASSENGER AND INJURY OF DRIVER *LA SEE ALSO VOQ 10171110. *DSY.
CAMRY	2002	20030904	MAKIA CAFUA, DRIVING HER 2002 TOYOTA CAMRY, VIN 4TIE32K92U636868, WAS ENTERING I-93 AT EXIT 39 AT 5:30 IN THE MORNING WHEN HER CAR SUDDENLY SHOT ACROSS THREE LANES OF TRAVEL AND WAS HIT, BROAD SIDE, BY ANOTHER VEHICLE TRAVELING IN THE HIGH SPEED (3RD) LANE. TRAFFIC AT THE TIME OF THE ACCIDENT WAS LIGHT. IT IS BELIEVED THAT THE CAMRY EXPERIENCED AN UN-COMMANDED ACCELERATION CAUSING MRS. CAFUA TO LOSE CONTROL RESULTING IN THE ACCIDENT AND HER DEATH. THE CAMRY HAS BEEN STORED SINCE THE ACCIDENT AND NO CHANGES HAVE BEEN MADE TO ITS POST ACCIDENT CONDITION. VEHICLE IS AVAILABLE FOR INPECTION/TESTING BY NHTSA. *AK
CAMRY	2002	20040122	WITNESSES SAW MY PARENTS VEHICLE (A 2002 TOYOTA CAMRY) COMING TO A STOP AND THEN SUDDENLY ACCELERATE.*AK
CAMRY	2003	20040316	WHEN COMING OUT OF A PARKING LOT ACCELERATOR STUCK, CAUSING THE VEHICLE TO ACCELERATE OUT OF CONTROL. VEHICLE GRAZED ANOTHER VEHICLE, WENT ACROSS A STREET, GRAZED A BUILDING, AND DROVE STRAIGHT INTO ANOTHER BUILDING. DRIVER WAS CONSCIOUS WHEN PARAMEDIC ARRIVED. THEY FOUND THE DRIVER WITH BOTH FEET STILL ON THE BRAKE PEDAL. DRIVER WAS TRANSPORTED TO THE HOSPITAL, AND LATER DIED DUE TO FATAL INJURIES FROM THE CRASH. THE INSURANCE COMPANY PRESERVED THE VEHICLE AS EVIDENCE. THE POLICE REPORT STATED THE CRASH WAS DUE TO A MECHANICAL DEFECT. *AK *NM

58

306. The gravity of the SUA defect and Toyota's knowledge of the defect is evident from the descriptions provided by vehicle owners. Attached as Exhibit A is

⁵⁸ TOY-MDLID00017271

1 a summary of customer SUA complaints described by Toyota as complaints taken
2 just from the “Field Reports Database,” where the floor mat or pedal was not
3 implicated.

4 **E. Toyota Continues to Deny Electronic Throttle Defect Despite Post-Recall**
5 **Complaints**

6 307. Toyota and NHTSA continued to receive complaints of unintended
7 acceleration by vehicles not involved in the recalls or by vehicles which have
8 participated in the recalls and been “fixed.”
9

10 308. On February 22, 2010, Toyota conducted a “webinar” purporting to
11 address the various safety concerns plaguing Toyota and Lexus vehicles. While
12 Toyota had previously claimed that the braking problems in the Prius and Lexus ES
13 250h were unrelated to the unintended acceleration problem, in the webinar Toyota
14 admitted they were linked by suggesting that the ETCS-i system facilitates electronic
15 braking control (among the other “advantages” Toyota touted in regard to the
16 ETCS-i system).
17

18 309. On March 2, 2010, TMC Executive Vice President, Takeshi
19 Uchiyamada, Executive Vice President, submitted prepared testimony to the Senate
20 Committee on Commerce, Science and Transportation. Mr. Uchiyamada’s
21 testimony purported that the ETCS-i system is tested “extensively both in the design
22 phase and after it is developed to ensure that there is no possibility of ‘sudden
23 unintended acceleration.’” In reality, Toyota relies heavily upon its component
24 suppliers to perform such testing. Toyota’s suppliers typically complete Toyota’s
25 parts level testing independently. Toyota performance standards apply only to Tier 1
26 suppliers. Toyota does not have any clearly written rules or regulations about who
27
28

1 must conform to Toyota's standards below its Tier 1 suppliers. For instance, while
2 Toyota may impose testing standards on CTS, the supplier of the sticky accelerator
3 pedals at issue, when questioned before Congress, Toyota engineers could not testify
4 that Toyota imposed similar controls on the manufacturers of the sensors and circuit
5 board that CTS utilizes in its pedal. Moreover, Toyota's engineers admitted that
6 "there is no particular or special testing that would directly prove that there is no
7 unintended acceleration."
8

9 310. On March 5, 2010, Congressmen Henry A. Waxman and Bart T.
10 Stupak, Chairmen of the House Subcommittee on Oversight and Investigation, wrote
11 a letter to James E. Lentz, President and Chief Operations Officer of Toyota Motor
12 Sales U.S.A., Inc., stating, among other things:
13

14 We do not understand the basis for Toyota's repeated
15 assertions that it is "confident" there are no electronic
16 defects contributing to incidents of sudden acceleration.
17 We wrote you on February 2, 1010, to request "all analyses
18 or documents that substantiate" Toyota's claim that
19 electronic malfunctions are not causing sudden unintended
20 acceleration. The documents that Toyota provided in
21 response to this request did not provide convincing
22 substantiation. We explained our concerns about the
23 failure of Toyota to substantiate its assertions in our letter
24 to you in February 22, 2010.
25
26
27
28

1 After we sent our letter on February 22, Toyota provided a
2 few additional documents to the Committee early in the
3 morning on the day of the hearing. Several of these
4 documents were written in Japanese. While some of these
5 documents appear to contain preliminary fault analyses that
6 could be used in planning a rigorous study of potential
7 cause of sudden unintended acceleration, not one of them
8 suggested that such a rigorous study had taken place. As
9 we explained in our February 22 letter, the only document
10 Toyota has provided to the Committee that claims to study
11 the phenomenon of sudden unintended acceleration in a
12 comprehensive way, is an interim report from the
13 consulting firm Exponent, Inc. This report has serious
14 deficiencies, as we explained in our February 22 letter.

17 311. Toyota has continued to maintain that there are no problems with its
18 ETCS-i in public and in depositions, but has provided little or no support for these
19 statements. For example, when asked why Toyota believed there were no problems
20 with the ETCS-i, its technical analysis manager testified falsely, “[t]his basis for
21 those statements would be when we have been asked to investigate any customer
22 concern involving unintended acceleration, we have never found anything related to
23 the electric control system that could be the cause of those matters.”

25 312. Reports of SUA events occurring after vehicles have received a pedal
26 and mat fix contradict Toyota’s claim that the recalls have fixed the SUA defect
27 issues:
28

1 The contact owns a 2009 Toyota Camry. while the contact
2 was attempting to stop the vehicle traveling at a low speed,
3 the vehicle felt as if it was still accelerating once the brakes
4 were applied. The vehicle was taken to the dealership
5 where the contact was informed that the vehicle was
6 performing normally. *One day prior to the recent failure,*
7 *the contact had taken her vehicle to the dealership where*
8 *both NHTSA recalls, 10v017000, and 09v388000, vehicle*
9 *speed control, accelerator pedal were performed on her*
10 *vehicle. The current and failure mileages were 26000.*

13
14 The contact owns a 2007 Toyota Camry. While the contact
15 was driving 30 mph the vehicle *suddenly began to*
16 *accelerate causing the vehicle to crash into a ditch, the*
17 *vehicle was still accelerating while it was stuck in the ditch*
18 *which caused the front end of the vehicle to catch on fire.*
19 No one was injured during the incident. A police report
20 was filed. Four days prior to the recent incident the contact
21 had taken the vehicle to the dealership *and the NHTSA*
22 *campaign ID number, 09v388000 and 10v017000 were*
23 *performed on the vehicle. The current and failure mileages*
24 *were 26000.*

1 2007 Toyota Camry Le continues to have runaway
2 unintended acceleration despite the vehicle undergoing a
3 series of modifications at a Toyota dealership in Auburn,
4 CA. *It has happened prior to be fixed and has happened*
5 *once since being fixed.*
6

7
8 I drive a 2007 Toyota Camry *this is one of the safety recall*
9 *cars.* I had been having issues with acceleration before the
10 recall, then got the recall fixed on February 21st. I had a
11 few small issues these past few weeks with it suddenly
12 accelerated but this morning the way to work I was driving
13 on the 101 in Phoenix heading to work when my Camry
14 suddenly started accelerating this time it was not a small
15 issue but it accelerated to almost 80 mph I was driving
16 around 65 mph when it suddenly started. I got the car
17 slowed down and pulled over to the side of the road to
18 catch my breath because I was very scared. I then made it,
19 the rest of my way to work which was about 8 miles. I
20 drive 50 miles each way to work everyday, I drop my
21 husband off at work, I drop my 17 month old daughter off
22 at daycare and this to me is unacceptable. I as of today do
23 not trust this car to drive any where. Something needs to
24 be done about this immediately, can you please help in
25 making that happen.
26
27
28

1
2 The contact owns a 2007 Toyota Avalon. *She states that*
3 *she received a recall notice for the repair for the*
4 *accelerator pedal. She stated that after the repair was*
5 *performed she was at a stop when the vehicle accelerated*
6 *on its own when this occurred she then put it in neutral and*
7 *stopped the vehicle. The vehicle was then towed to the*
8 *dealer where they stated that they are still trying to figure*
9 *what went wrong. The vehicle is still at the dealer for*
10 *diagnosis. The failure and current mileage was 23800.cv*
11
12
13
14 *2007 Toyota Camry recalled had the new parts installed @*
15 *dealership. After which I experienced the accelerator*
16 *sticking and not slowing down without pressure to brakes.*
17 *Returned to the dealership and they said they couldn't*
18 *duplicate the problem, found no fault codes and rechecked*
19 *the fixes they had previously installed. The problem still*
20 *remains, the car doesn't decelerate when you let off the*
21 *accelerator and in fact had an instance of it speeding up and*
22 *decelerating freely on it's own. The dealership informed*
23 *me there is nothing they can do as their computers didn't*
24 *find anything wrong but as the owner of this vehicle there*
25 *is clearly something wrong with it that I do not feel safe*
26 *driving this vehicle.*
27
28

(Emphasis added.)

313. In 2010 Toyota responded to 14,000 UA complaints, many of these in vehicles that were purportedly “fixed” pursuant to a recall.

F. Over 70% of Unintended Acceleration Events Are in Vehicles Not Covered by the Recall

314. Based on a review of 75,000 documents, the House Committee on Energy and Commerce had three significant concerns with Toyota’s recalls and explanations:

First, the documents appear to show that Toyota consistently dismissed the possibility that electronic failures could be responsible for incidents of sudden unintended acceleration. Since 2001, when Toyota first began installing electronic throttle controls on vehicles, Toyota has received thousands of consumer complaints of sudden unintended acceleration. In June 2004, the National Highway Traffic Safety Administration (NHTSA) sent Toyota a chart showing that Toyota Camrys with electronic throttle controls had over 400% more ‘vehicle speed’ complaints than Camrys with manual controls. Yet, despite these warnings, Toyota appears to have conducted no systematic investigation into whether electronic defects could lead to sudden unintended acceleration.

1 315. This concern is significant because it appears from 2004 to 2009;
2 Toyota was selling cars without knowledge of what caused the defect or disclosure
3 of the defect.

4 316. Next, the Committee rejected tests submitted by Toyota that were
5 conducted at the request of Toyota's litigation counsel, Bowman and Brooke, LLP:
6

7 Second, the one report that Toyota has produced that
8 purports to test and analyze potential electronic causes of
9 sudden unintended acceleration was initiated just two
10 months ago and appears to have serious flaws. This report
11 was prepared for Toyota by the consulting firm Exponent,
12 Inc. at the request of Toyota's defense counsel, Bowman
13 and Brooke, LLP. Michael Pecht, a professor of
14 mechanical engineering at the University of Maryland, and
15 director of the University's Center for Advanced Life
16 Cycle Engineering (CALCE), told the Committee that
17 Exponent 'did not conduct a fault tree analysis, a failure
18 modes and effects analysis ... or provide any other
19 scientific or rigorous study to describe all the various
20 potential ways in which a sudden acceleration event could
21 be trigger' 'only to have focused on some simple and
22 obvious failure causes'; used 'extremely small sample
23 sizes'; and as a result produced a report that "I would not
24 consider ... of value ... in getting to the root causes of
25 sudden acceleration in Defective Vehicles.'
26
27
28

1 317. Again, the concern over the Exponent Bowman and Brooke report
2 highlights (a) that Toyota had no credible prior report or analysis of SUA; (b) that
3 Toyota had been selling vehicles without disclosure of the defect; (c) Toyota's
4 inability to understand the basis for the defect; and (d) its failure to provide a fail-
5 safe to prevent unintended acceleration.
6

7 318. The Committee then addressed Toyota's lack of truthfulness in its
8 statements and rejected the notion that floor mats or pedals were the sole cause of the
9 problem:

10 Third, Toyota's public statements about the adequacy of its
11 recent recalls appear to be misleading. In a February 1,
12 2010, appearance on the *Today* show, you stated that
13 Toyota has "studied the events of unintended acceleration,
14 and [it] is quite clear that it has come down to two different
15 issues," entrapment of accelerator pedals in floor mats and
16 sticky accelerator pedals. In an appearance the same day
17 on CNBC you repeated this claim and reported that Toyota
18 is "very confident that the fix in place is going to stop
19 what's going on."
20
21

22
23 The documents provided to the Committee appear to
24 undermine these public claims. We wrote to you on
25 February 2, 2010, to request any analyses by Toyota that
26 show sticky pedals can cause sudden unintended
27 acceleration. Toyota did not produce any such analyses.
28

1 To the contrary, Toyota's counsel informed the Committee
2 on February 5 that a sticky pedal "typically ... does not
3 translate into a sudden, high-speed acceleration event."

4 Moreover, our review of the consumer complaints
5 produced by Toyota shows that in cases reported to the
6 company's telephone complaint lines, Toyota personnel
7 identified pedals or floor mats as the cause of only 16% of
8 the sudden unintended acceleration incident reports.
9

10 Approximately 70% of the sudden unintended acceleration
11 events in Toyota's own customer call database involved
12 vehicles that are not subject to the 2009 and 2010 floor mat
13 and "sticky pedal" recalls.
14

15 319. Toyota's denials of an ETCS defect persisted even when independent
16 professional engineers concluded in February 2009, that a SUA incident in
17 Tennessee was caused by deviations with ETCS.⁵⁹

18 320. One reason why Toyota lacks sufficient test data on the reliability of
19 ETCS, and had to rely on a report belatedly ginned up by Exponent and Bowman &
20 Brooke, is the overall slip at Toyota in its attention to quality control. Toyota has
21 sacrificed safety for speed.
22
23
24
25
26
27

28 ⁵⁹ TOY-MDLID90053223.

G. Toyota's Quality Control Standards Had Deteriorated to Such an Extent that Toyota did not Know if Its Cars Were Safe and Reliable as Advertised

1. Toyota should have disclosed that its quality standards had deteriorated.

321. In the last ten years, the Toyota culture has changed. As acknowledged by Toyota's own documents, the emphasis on quality gave way to an emphasis on fast production. While production and production goals increased, the number of trained quality control employees decreased. Experienced assembly and quality workers were replaced with over a thousand inexperienced and relatively untrained temporary workers.

322. This resulted in a significant increase in quality control problems per vehicle. Defects were ignored in the interest of speed and quantity of production. Defects that in the past would have resulted in stoppage of the line were overlooked. Quality control employees were often told by supervisors that when they find a defect they are not to record it but are to look for other cars that do not have the defect, and only then report the original defective car as an isolated incident that does not require a recall. Quality control employees are given goals that set an upper limit on the number of defects they are to report.

323. As acknowledged by a high level executive:

"QDR⁶⁰ & Valve advantage lost (Toyota's core positioning destroyed).

324. The loss of "QDR & Valve" had the following root causes among others:

⁶⁰ QDR refers to the Toyota promise of Quality, Dependability and Reliability.

- Deteriorating design suitability for market
(escalating warranty & recalls, discounting and
plateauing market share, customer dissatisfaction)
- Deteriorating design quality (escalating warranty,
recalls)
- Lack of transparency / cooperation / caring (Have we
buried problems? We haven't been seen to be good
corporate citizens)
- Grown too fast in numbers & global scale=> impact
on plants, associates, engineers & suppliers
(overstretched in development, operations, training
& repair)
- Technology is so advanced that engineers can't keep
pace (overworked in both development & diagnosis /
repair)
- Focus has moved from customers & products to
financial & numerical goals (We have become
obsessed with the wrong things)
- Grown too complex with global & regional
structures; simple & real word of mouth
communications crippled (no one knows what is
happening)

- Centre of Company too far from reality & adverse to change (Decentralised but lost global data & leadership)
- Too much fear in workplace to report problems up (may be typical of Japanese corporation)
- Too much homogeneity (Group-think with no outside directors, non non-Japanese voices at highest levels)

325. Or as another executive described it “quality control has not functioned and “customer first quality first, fatally became our slogan in name only.” In the view of this executive “quality check and quality assurance became only, cost became the top priority....” In order to keep up with spect Toyota “cut development period, drastically reduced test production ... and trial methods to check quality and evaluation.”

2. Toyota should have disclosed that it was not meaningfully investigating UA.

326. As noted by the North American Advisory Panel, Toyota made no serious effort to understand the root causes of UA complaints soon after they first began appearing in 2002/03.

327. Toyota failed to gather information from its U.S. call centers, from NHTSA, and from dealers on UA issues. That slowed the company’s conformation of serious quality problems relating to UA.

328. The company should have responded more proactively to accidents involving fatalities, even those accidents attributed to driver error or to other human

1 error. It should have worked from the perspective of product-liability prevention to
2 eliminate or at least minimize accidents.

3 329. Several factors dissuaded Toyota's quality assurance personnel from
4 acting more proactively, a fact not disclosed to consumers. Below are two factors
5 that were influential in Toyota's failure to timely and appropriately respond to UA:
6

- 7 • Rather than investigate and pursue root causes, Toyota was worried that
8 accident data possessed by Toyota could affect the course of litigation.
- 9 • Toyota was also worried that the discovery of a defect in a vehicle
10 would imply the existence of the same defect in other vehicles, and that
11 could occasion a surge of complaints and necessitate a technical
12 response.
13

14 330. Toyota was not acting forthrightfully in analyzing UA and quality
15 problems, in determining the fundamental causes of the problems, and in taking
16 effective countermeasures.

17 331. A hindrance to proper investigation was the fact that Toyota's Legal
18 Division analyzed claims with a legalistic mindset and failed to share crucial
19 information promptly and in good faith with quality-related divisions.
20

21 332. Toyota also failed to gauge the effectiveness of its measures for
22 responding to serious problems, such as accidents involving fatalities. That should
23 include monitoring the frequency of similar accidents and complaints. Managing the
24 processing of customer complaints is a crucial sector of quality assurance, and
25 monitoring the pattern of complaints about a problem after receiving the initial
26 complaint about the problem is especially important.
27
28

1 333. Toyota should have paid daily attention to the customer complaints
2 received by NHTSA. There is information on the NHTSA database that is
3 sufficiently concrete, and that makes it well worth monitoring. Devoting more
4 attention to postings would have alerted people at Toyota earlier to the severity of
5 UA problems. Toyota failed to use that information to supplement the information
6 obtained through proprietary channels, such as field technical reports, customer
7 complaints, and responses to complaints. That should include collating the
8 information by kind of accident and by the location of defects in vehicles. As a
9 result Toyota was ignorant of the growing UA trend.
10

11 **3. Toyota should have disclosed it was not devoting the resources to**
12 **properly investigate UA.**

13 334. Toyota has lacked sufficient capacity for conducting onsite
14 investigations promptly after the suspected occurrence of serious quality problems.
15 It has also lacked adequate capacity for follow-up information gathering.
16

17 **4. Toyota should have disclosed a lack of proper integration that**
18 **lowered safety and quality.**

19 335. Toyota's engineering operations in Japan and the company's overseas
20 operations did not sufficiently share information with each other. Part of the
21 problem is that customer complaints received by overseas dealers and by overseas
22 operations were not sufficiently collated and analyzed. There was inadequate
23 sharing of information regarding customer sentiment in overseas markets between
24 the Japan-based engineering operations and overseas operations. As one executive
25 summarized, the words "customer first, quality first," "become just slogans and were
26
27
28

1 just words with no real force,”⁶¹ to such an extent that “execution of product quality
2 guarantee functions” has “made a joke of that.”

3 336. Quality problems were arising in vehicles that have been on the road for
4 a while. Toyota had not been rigorous enough in monitoring quality performance in
5 the field after completing development work and putting models into mass
6 production.
7

8 **H. Toyota Identifies Many Root Causes of SUA Confirming the Need for**
9 **Brake Override and Other Countermeasures**

10 337. Toyota received numerous Field Technical Reports (“FTR”) where
11 SUA events were confirmed and where the cause was not a mat or “sticky” pedal.
12 For example, on December 9, 2009, a FTR was issued concerning a 2009 Camry.
13 The customer reported RPM surge of up to 1200 RPM. The FTR confirmed the UA
14 event and the condition could be replicated. To fix the problem in this instance
15 Toyota replaced the “Head SUB-ASSY, Cylinder.”
16

17 338. In May 2005, a customer complained that after releasing the throttle
18 engine speed remained at 5,000 RPM. A dealer could not replicate the problem but
19 when the dealer reinstalled the throttle body he replicated the condition and
20 confirmed it was not caused by a floor mat. Toyota replaced the throttle (Part
21 222102 1020).⁶² This is just one of many occasions where a high idle speed was
22 fixed by replacement of the throttle body.
23
24
25
26

27 ⁶¹ TOY-MDL01153145.

28 ⁶² TOY-MDLID002444.

1 339. A customer driving a 2008 Corolla reported the engine accelerated up to
2 60 mph. On inspection the “condition was duplicated” without triggering a DTC
3 Code. Toyota replaced the ECU. (Part #8966102M92.)

4 340. In 2007, after a SUA event that caused the vehicle to accelerate up to
5 70 mph, the dealer found a faulty pedal sensor. Case 200704030437.

6 341. On December 12, 2008, an Early Warning Report was generated by
7 Toyota de Brasil regarding a Corolla. The report noted that this is a, “new Corolla
8 which presented a spontaneous engine speed acceleration. This is the first case and it
9 is a dangerous problem because it can cause a serious accident, putting the life of the
10 customer and other people at risk.” The report noted that “this incident resulted in a
11 light collision.” The dealer confirmed this was not a carpet or floor mat problem.

12 342. In one FTR Toyota found the SUA was caused by the accelerator pedal
13 position sensor and despite engine idles at 4000 RPM there are no “diagnostic
14 trouble codes.”

15 343. Toyota recognized that SUA can be triggered by a malfunction from
16 many different failures. In a 2004 “check sheet” it identified that the accelerator
17 pedal, cable, cruise control, air valve, throttle body, accelerator and throttle sensor,
18 EFI computer, wire harness and cruise control all were possible factors.

19
20
21
22 **I. Toyota Uniformly Rejected Claims, Hid Material Facts From Consumers,**
23 **Affirmatively Misled Consumers and Failed to Make Repairs**

24 344. When a customer reports a SUA event, Toyota uniformly rejects any
25 claim of any defect, fails to disclose the existence of hundreds if not thousands of
26 similar SUA claims, and fails to repair the vehicle.

1 345. Typical of Toyota's response to a consumer claiming SUA is the
2 following letter sent from TMS' California offices:

3 Re: Date of Loss: February 2, 2009
4 Vehicle: 2007 Lexus ES 350
5 VIN: ...

6
7
8 Dear _____:

9
10 This letter is in response to your communication with
11 Lexus Customer Satisfaction. Toyota Motor Sales, USA,
12 Inc. ("TMS") has reviewed your claim and conducted a
13 technical inspection of your vehicle.
14

15
16 You reported that while driving the vehicle on the interstate
17 it accelerated on its own and you were unable to stop it for
18 nearly two miles when it finally slowed after a concerted
19 effort on your part. You believe that this was due to a
20 defect in your vehicle.
21

22
23 The inspection of your vehicle revealed no evidence of any
24 vehicle defects or malfunction. The throttle assembly and
25 accelerator pedal were operating as designed, with no
26 binding or sticking of any of the components. The brakes
27
28

1 showed signs of excessive wear which is consistent with
2 what you described happened to you.
3

4 The inspection also revealed that the floor mat was in a
5 position where it could interfere with the operation and
6 travel of the accelerator pedal. When the vehicle was taken
7 in to the dealership, the floor mat retaining clips were not
8 properly secured which allowed the floor mat to move out
9 of position. While we understand that you feel the floor
10 mat was not the problem, the evidence revealed during our
11 inspection showed otherwise.
12
13

14
15 We are very sorry about to learn of this unfortunate
16 incident, however, our inspection of your vehicle found
17 that the incident was not due to any sort of manufacturing
18 or design defect, and we are unable to offer additional
19 assistance.
20

21
22 Thank you for allowing us the opportunity to address your
23 concerns.
24

25
26 Very truly yours,
27
28

1 Troy Higa

2 Claims Administrator⁶³

3 346. Typical of Toyota's blanket denial and refusal to repair is the response
4 to a 2007 Lexus ES 350 owner who reported that she had a SUA event that was not
5 caused by floor mats (as there was no floor mat on the drivers' side) and it was not
6 caused by pressing the gas instead of the brake. In a detailed e-mail to Toyota in
7 October 2009, she described how she had dropped her daughter off one evening, just
8 as she normally did five times a week. As usual, she backed into the neighbor's
9 driveway. Her daughter and her son-in-law were watching her. Her friend was in
10 the passenger seat. All of a sudden the Lexus began to race out of control. She tried
11 unsuccessfully to brake, but the car kept accelerating until it reached speeds up to 90
12 miles an hour.
13
14

15 347. The owner reported that the Lexus hit several curbs, cracking and lifting
16 the concrete. It was travelling so fast that the passenger side door flew open and
17 smashed against the front of the car. She told Toyota that the only thing that saved
18 their lives was a concrete wall into which the car smashed and finally came to a halt.
19

20 348. The driver reported that she was healthy and active, had good reflexes
21 and that she did not wear glasses or contacts. She then directly asked Toyota a
22 number of questions like how she could have kept her foot on the accelerator pedal
23 as she and her passenger were thrown about the interior of the car, only being held in
24 place by the seat belts and how could she have accelerated enough in a small parking
25 turn about to reach a speed that the car broke concrete.
26

27 _____
28 ⁶³ TOY-MDLID00199764.

1 349. Toyota responded to this customer by claiming the vehicle was “in
2 proper working order free of any type of mechanical defect.”⁶⁴ Toyota failed to
3 address the points raised by the SUA victim or to interview witnesses to verify her
4 account and failed to offer or recommend any repair.

5
6 350. Another example of Toyota’s blanket denial and refusal to repair policy,
7 involves plaintiffs Albert and Wanda Bosse who immediately called their dealer after
8 a SUA incident. The dealer did not want to examine the car and without conducting
9 an examination blamed the incident on driver error.

10 351. Plaintiffs Rich and Jan Bowling had a SUA incident in their 2005
11 Avalon, presented the car to Toyota and were informed it was due to driver error.
12 Toyota failed to repair the vehicle.

13
14 352. Plaintiff Vanessa Bozeman presented her vehicle after a SUA event for
15 repair and was told it was operating “normally,” and Toyota failed to repair.

16 353. Surrindertal Barring had a crash in her 2007 Camry when the vehicle
17 suddenly accelerated and the brakes failed to respond. The vehicle hit a fence and
18 flipped over. The vehicle had been taken to Toyota on prior occasions for SUA.
19 Toyota found the vehicle to have “no defects.”

20
21 354. Even where a consumer had a professional engineer conclude that the
22 ETCS system was at fault, Toyota through a TMS claims manager in Torrance,
23 California, informed the consumer “there have been no confirmed or documented
24 reports or findings of any type of computer malfunctions related to the
25

26
27
28 ⁶⁴ TOY-MDLID90011084.

1 brake/acceleration or electrical systems.”⁶⁵ It was Toyota’s standard practice to issue
2 uniform denials like that above from its claims manager in Torrance.

3 355. Such letters of denial were sent despite instances where police officers
4 found “physical evidence at the scene suggesting that vehicle #1 was continually
5 accelerating throughout the incident.” The officer in this incident noted the impact
6 caused the driver to “shift violently in her seat. This officer feels it is unlikely she
7 would have been able to manually accelerate throughout the event.”⁶⁶

9 356. To make matters worse a TMS manager from Torrance falsely stated on
10 repeated occasions that “the brakes will always override the throttle.”⁶⁷ This was a
11 flat-out lie as Toyota did not have a brake-override until 2010.

12 **J. Continuing Warranties and Misrepresentations**

13 357. On November 25, 2009, Toyota falsely represented and warranted that
14 floor mats were the cause of SUA. In print media and in statements made to Toyota
15 dealers for dissemination to new vehicle buyers, Toyota falsely represented that
16 “Toyota vehicles are among the safest on the road today,” that there was no problem
17 with ETCS and that ETCS has been “evaluated numerous times.”
18

19 358. On November 2, 2009, Toyota announced that “no defect exists in
20 vehicles in which the driver’s floor mat is compatible with the vehicle and properly
21 secured.”⁶⁸ Toyota further represented and warranted falsely that:
22
23
24

25 ⁶⁵ TOY-MDLID90054928.

26 ⁶⁶ TOY-MDLID90053562.

27 ⁶⁷ TOY-MDLID90059533.

28 ⁶⁸ TOY-MDLID00008630.

1 The question of unintended acceleration involving Toyota
2 and Lexus vehicles has been repeatedly and thoroughly
3 investigated by NHTSA, without any finding of defect
4 other than the risk from an unsecured or incompatible
5 driver's floor mat;
6

7
8 Toyota takes public safety seriously. We believe our
9 vehicles are among the safest on the road. Our engineers
10 are working hard to develop an effective remedy that can
11 help prevent floor mat interference with the pedal. As soon
12 as it is ready, we will notify owners of the relevant models
13 to bring their vehicle to a dealer for the necessary
14 modification at no charge.
15

16 359. Toyota continues to make misleading safety claims in advertisements.

17 360. Toyota, through Joel Smith of Bowman and Brooke, hosts webinars
18 where misleading statements concerning the causes of SUA and the safety of Toyota
19 vehicles are made to selective members of the press for the purpose of passing these
20 safety claims onto consumers.
21

22 361. Secretly, Toyota has received credible reports of SUA events on
23 vehicles that were subject of both recalls, including an incident with videotape
24 evidence that the driver was attempting to brake the vehicle. Toyota has not
25 provided these reports to NHTSA or revealed these facts to the public or at its
26 webinars.
27
28

1 362. Toyota has not disclosed that for the period after the recalls through
2 January 2011 over 300 complaints of SUA have been filed with NHTSA. In many
3 cases the vehicle had been "repaired." Below are just a few examples:

4 2007 Toyota Camry - prior to recall fix the car accelerated
5 at full speed 5 times. *Car was "fixed" under recall 2*
6 weeks ago. Today, March 4, the car once again accelerated
7 to full speed. Accelerator pedal seemed to collapse to the
8 floor and remained in the position until i used my toe to
9 pull it up.
10

11
12 While parking my 2010 Camry at the grocery store, I
13 slowly turned into the parking space and my car suddenly
14 accelerated jumping the curb and hitting a cement
15 surrounded light pole. The air bags did not deploy and I
16 was not noticeably injured. *The car had just had the*
17 *replacement pedal installed on March 2, 2010, as ordered*
18 *by the recall.* The vehicle was towed to Avondale Toyota
19 in Avondale, Arizona and is currently awaiting a
20 representative from Toyota to inspect it on Mon. March 8th
21 before any work will be done. Property damage only to the
22 vehicle. We were told at the dealership that the airbags
23 only deploy after 20 miles per hour. We have never before
24 had a problem with the accelerator sticking.
25
26
27
28

1 I purchased a new 2010 Toyota Camry in Oct-2009 and I
2 realized after 2-3 weeks that there is something wrong in
3 there. The rpm goes high (and tries to stay there) when
4 down-shifting even without the leg is off the gas paddle.
5 While I understand that downshifting may increase rpm but
6 then I feel like it wants to stay there by means of some un-
7 intended acceleration. When I realized that there is
8 something wrong, I just ignored the issue because I did not
9 want to take the car to the dealer and let them mess it up
10 further. I thought this is happening because it is a new car.
11 After few miles driven, the issue will go away. But when I
12 learned about the un-intended acceleration in January 2010,
13 I realized that the issue is more serious and I should not
14 ignore any more. I went to dealer but as I expected, they
15 did not take it seriously and told me that the car runs as per
16 design. I went for the recall too but it did not make any
17 difference. Being an engineer, I myself have established
18 few simple test cases where one can prove that there is
19 definitely something wrong in the car. And if the car runs
20 as per design, then there is something wrong in the design
21 itself. I knew in advance that taking the car to the
22 dealership was not going to work. I purchased a new
23 vehicle so that I can keep on driving it nicely for years to
24 come but I never expect it to be going to garage for such a

1 serious issue in less than 3 months! I have not received
2 any satisfactory answer/solution to my problem so far.

3
4 I bought a 2008 Toyota Sequoia and the *pedal has been*
5 *fixed*. Somehow, occasionally I am still experiencing
6 “sudden acceleration.” Recent article explains the pedal fix
7 doesn’t completely fix the “sudden acceleration” problem
8 that is due to electronic defects and that explain why I am
9 still experiencing sudden acceleration problem. The car
10 just jerk forward for no reason. Please have Toyota fix the
11 problem ASAP or we can return the car.
12
13

14
15 On Feb. 11, 2010 I took my Toyota Avalon *in for the*
16 *accelerator recall*. On Feb. 17, 2010, I was pulling into a
17 parking space on the grounds of the elementary school I
18 worked at that day when my car accelerated. It jumped the
19 curb sideswiping my car with a car that was parked on my
20 right. After it hit the ground from jumping the curb it
21 accelerated again heading straight toward the school
22 building. I put two feet on the brake and pressed as hard as
23 I could. The car did stop. The car was towed by AAA to a
24 Toyota dealer. I bought the car at Molle Toyota in KC,
25 MO where I live (overland Park, KS). The insurance
26 adjustor came that day to check the damage. He said an
27
28

1 investigator would be out to check it the “cause of impact.”
2 As of now, that has not happened. My insurance company
3 keeps telling me to take the car back to KC for repairs and I
4 told them I will not drive an unsafe car. I will not touch the
5 car until someone investigates the reason for the
6 acceleration. I have called my dealer, who has been
7 wonderful; Toyota Corporate who has been horrible (the
8 first thing “Barbara” said to me was “Well, what do you
9 want me to do about it?”) She reluctantly said she would
10 check it out. She called the Toyota dealer in and told him
11 that Toyota inspectors would be out within 10 days but
12 didn’t know when. I called the highway transportation
13 safety dept. who said they didn’t deal with that and to call
14 my attorney general. I called the attorney general who told
15 me to email this address. So ... status: my car is still on a
16 Toyota lot and nobody will take responsibility for what
17 happened or help me with my next steps. *I don’t think*
18 *anyone believed that the car accelerated after the recall*
19 *fix.* Finally, it appears that others around the country are
20 having the same issue. I have an unsafe vehicle that I will
21 not drive and don’t know what to do next. Thank you.

22
23
24
25
26
27 Purchased my 2010 Toyota Corolla s in July and it has
28 been recalled 3 times. *Had accelerator pedal fixed weeks*

1 *ago*. Yesterday while brushing snow off car it began to rev
2 and accelerator pedal had depressed itself and stuck. I had
3 to manually pull up the pedal. I use this car for work and
4 drive approx. 2500 miles per month. I transport clients and
5 children. I bought a Toyota for safety and resale value! I
6 do not feel safe in this car. I have tried to trade it in and
7 dealers will not take it. It is unsellable and unsafe. I want
8 Toyota to take this car and give me my money back. It is a
9 bad product!
10 bad product!

11
12 2008 Toyota Avalon was *recalled to replace a gas pedal*.
13 The car was taken in to the Toyota dealer for the said
14 repair. It took 4 hours. A few days later the car was in
15 reverse and was slowly backing out of a *residential carport*
16 *when it accelerated on its own* and the car did about 3
17 loops around the garage area of the home causing damage
18 to the car, benches, tree, bushes, lamp post, etc. This
19 happened after the recalled defect was repaired. Owner of
20 vehicle put in claim to her own insurance company, put in
21 a call to the 800 Toyota number and had car towed to
22 where she purchased the car. Everyone seems concerned,
23 but only wants to repair the damage to the car rather than
24 get to the root of the problem. We thought Toyota had the
25
26
27
28

1 fix, but apparently not since accelerating and going out of
2 control on an accelerated pace.

3
4 On 2/12/10 my 2010 Toyota Camry *received an*
5 *acceleration fix*. In addition I was informed a fail-safe
6 computer program was put in. On 2/17/10 as I was
7 entering my parking slot, *the car did an unintended sudden*
8 *acceleration* without my foot being on the accelerator. I
9 was pressing the brake. I jammed both feet into the break.
10 After 3 seconds, as my car was climbing up a snow bank, it
11 stopped. The engine was idling while my gear shift was in
12 drive. This is the second level on the fail-safe system.
13 This means that: "if both accelerator position sensors fail,
14 or if one throttle position sensor fails, the ECM will ...
15 return the engine to idle speed. Had the incident happened
16 one minute earlier, I would have been in a high
17 car/pedestrian area and would not have been able to avoid
18 an accident. The whole event took 5-6 seconds before the
19 car suddenly stopped. The fix done by Toyota is not the fix
20 for the acceleration problem."
21
22
23
24

25 On March 1 at 5:15pm I was on I-295 headed home and *my*
26 *2009 Toyota Camry LE accelerated after I had all three*
27 *recalls done at the Toyota of Waldorf*. As I was coming up
28

1 to a S500 Mercedes I attempted to slow my car down once
2 i pressed the brake, I felt the car switched to a higher gear,
3 I continues to press the brake as hard as I could, finally I
4 pulled off the road to the left into the grass where I then
5 threw it in neutral til it slowed down. I then cut it off and
6 called Toyota to complain. The service manager asked
7 would I like it towed and I replied "What do you think?" I
8 explained to her that I had all the recalled done on my car
9 and I don't understand how this happened. After they
10 towed my car the next morning I called to complain to the
11 GM they then transfer me over to another service manager
12 after I waited for the GM for several minutes. This service
13 manager tells me they are trying to figure out what's wrong
14 and offered me a rental car. I went to pick up the rental
15 and I realized after I got home that there were several
16 different models not just mine that were involved in this
17 recall so I decided to look up this 2010 Tacoma that they
18 gave me and sure enough it was on the list. I decided to
19 park this car and ride to the metro which drops me off half
20 of a mile from my job. I would rather take this hassle than
21 to drive any of these recall vehicles from Toyota. I have a
22 family that I have to protect and if this is how the "Toyota
23 family" care for its customers then I choose to not deal
24 with this "family" in the future. I am requesting from
25
26
27
28

1 Toyota that they put me in a car of equal value even if its
2 used and one that is not on the recall list. To all that have a
3 recall model from Toyota I recommend that you be very
4 cautious of the repairs done and drive even safer than
5 before. I have been on the phone twice today with the
6 corporate office attempting to speak with someone and
7 both times I was placed on hold for 30 minutes and still
8 couldn't reach anyone.
9

10
11 The contact owns a 2005 Toyota Avalon. He took the
12 vehicle to the dealer March 1, 2010 for the accelerator
13 replacement. Within ten minutes of picking the vehicle up
14 from the dealer, while driving at 25mph and attempted to
15 turn into a drive way the vehicle started to accelerate. He
16 put his foot on the brake but the brake pedal was hard to
17 depress and did not respond. He put the vehicle into
18 neutral and shut the engine off. He was able to restart the
19 vehicle and he drove it back to the dealer. The dealer
20 stated it might be the computer because it was re-seated.
21 He had not driven the vehicle since March 1st. The contact
22 stated he is afraid he will experience the failure again. The
23 dealer told him if he experienced the failure again he
24 should put his right foot on the gas pedal and put his left
25
26
27
28

1 foot on the brake. This will cause the gas supply to be cut
2 off and will cause the engine to shut off.

3 363. Toyota has sent tens of thousands of letters to UA victims falsely
4 claiming that their UA event was caused by driver error. In doing so, Toyota often
5 completely ignored eyewitness and police evidence to the contrary.
6

7 **K. Summary of the Defects in Defective Vehicles**

8 364. Vehicles with ETCS manufactured, marketed, sold and/or distributed by
9 Toyota and its affiliated companies suffer from the same overarching defect, in that,
10 they are more vulnerable to incidents of sudden unintended acceleration (“SUA”),
11 including surges, lurching, revving engines, and other instances of unintended
12 acceleration, than Toyota vehicles without ETCS.
13

14 365. For example, the rate of UA in ETCS cars versus non ETCS cars over
15 time is significantly greater. In 2002, NHTSA received approximately 25 complaints
16 on non ETCS Toyota vehicles per 100,000 vehicles versus approximately 60 in
17 vehicles with ETCS, over a doubling of UA.
18

19 366. In addition to the lack of an effective brake-override system or kill
20 switch, there are other specific defects in the Subject Vehicles that cause and/or
21 contribute to the overarching defect of SUA, including, but not limited to, defective
22 pedals and poorly designed floor mats, and there are design defects in the Subject
23 Vehicles that caused, contributed to, and/or failed to prevent SUA events, including
24 the following: (1) an inadequate fault detection system that is not robust enough to
25 anticipate foreseeable unwanted outcomes, including SUA; (2) the ETCS and its
26 components are highly susceptible to malfunction caused by various electronic
27 failures, including, but not limited to, short circuits, software glitches, and
28

1 electromagnetic interference from sources outside the vehicle; (3) there was a failure
2 to warn consumers as to how to properly push and hold buttons or to shift into
3 neutral in order to stop SUA events once the aforementioned defects had set the SUA
4 events in motion; and (4) vehicle design characteristics gave Toyota “definitive proof
5 of root cause” of UA. These design characteristics resulted in proven UA events and
6 clustered around:

8 A/C or P/S Idle-Up Concerns

9 Cruise Control Operation

10 HV Engine ON/OFF Shock

11 ABS Operation

12 Emissions Related RPM Increase

13 Warm-Up Idle Concerns

14 Driveline Thunk/Clunk

15 Drivability

16
17 367. In addition each vehicle was manufactured with software that was not
18 programmed in compliance with applicable industry standards, including but not
19 limited to the guidelines of the Motor Industry Software Reliability Association
20 (“MISRA”). MISRA was first published in 1998 to promote best practices in
21 developing safety-related electronic systems in road vehicles. At the time each
22 vehicle was sold to a class member its software was not MISRA compliant and not
23 as reliable as a reasonable consumer would expect. At best Toyota’s software was
24 only 50% MISRA compliant.
25

26
27 368. Toyota set its own software coding rules in a document titled: Power
28 Train System Electronic Control Unit Control Software For 32 Bits – Coding Rule.

1 369. Each class member's vehicle has software that fails to meet Toyota's
2 own software coding standard and rules. The following Toyota standards and rules
3 are frequently violated in the ECM code. A violation of these rules can affect code
4 clarity, consistency, and maintainability. Toyota's code violations include:

- 5 1. Use of parentheses in expressions for disambiguation.
- 6 2. Consistently use of symbolic names for variables and
- 7 constants.
- 8 3. Use of the *size of function* instead of a constant.
- 9 4. Use of parentheses around the body of a macro
- 10 definition.
- 11 5. Terminate each *switch* case with a *break* statement.
- 12 (Rule violations were noted without comments.)
- 13 6. Use of ternary operations (i.e., statements of the form
- 14 *x?y:z*) in the *etcs* module. (**211** uses of ternary
- 15 operations in the code, but only one appears in the
- 16 *etcs* module.)
- 17 7. The use of pre- or post-increment to decrement
- 18 operators in assignments (e.g., *x=y++*). (**61**
- 19 violations of this rule in the code.)
- 20 8. Limit variable names to 31 characters. (**58** violations
- 21 in the code. The longest names have **36** characters,
- 22 e.g.: *u2s_vpdccstdrnlrn_gnslpavcstdrnl.tbl*. Possibly,
- 23 the *u2s_* type prefix and the *_tbl* suffix were added
- 24 late in development.)
- 25
- 26
- 27
- 28

1 370. Toyota's software also suffered the following defects:

- 2 a. Due to insufficient reliability of the ECS the system does not
3 capture the driver's command.
4
5 b. Basic functions of the vehicle are lost due to insufficient
6 reliability of the communication lines, including the ECU hardware.
7
8 c. The system has insufficient communication speed and capacity.

9 371. As noted by a Toyota employee "software with many coding-rule
10 violations statistically is predicted to have a serious bug level." Toyota's software
11 due to its many coding violations is by its own declaration is at the "serious bug
12 level" which is unacceptable for vehicles whose occupants depend on their safety.

13 372. Considering the state of the practice in 2002 going forward the
14 following are minimum acceptable practices applicable to a safety critical software
15 system such as the Toyota ETCS:

- 16 • An effective technique should be used to detect both software- and
17 hardware-caused corruption of critical data.
18
19 • Safety critical systems must be designed with an expectation that one
20 or more tasks on the same CPU might fail via hanging, might fail to
21 be scheduled, might miss deadlines, or otherwise might not execute
22 in a periodic manner as intended, leading to a partial software
23 failure.
24
25 • Creating a safe system such as electronic throttle control requires
26 avoiding single points of failure.
27
28 • Failsafe mechanisms must be specifically tested to ensure that they
work properly.

- Effective watchdog timer use requires that the failure of any periodic task in the system must result in a watchdog timer reset.
- When using a “monitor-actuator” safety architecture, the monitor must be able to mitigate faults without requiring that the actuator software participates in that mitigation.
- Critical embed software must be subject to methodical scheduling analysis that ensures that every task can meet its deadline under worst-case fault-free operational conditions.
- Critical software functions with high cyclomatic complexity should be avoided if that complexity is primarily caused by structures other than single-level switch statements.
- Critical embedded software should be modular, and in particular should limit function size to no more than 1-2 pages of code including comments.
- Critical embedded software should use the minimum practicable variable scope for each variable, and should minimize use of global variables.
- Critical embedded software should follow a well-defined set of coding guidelines with essentially no deviations. MISRA C is an example of an accepted set of such coding guidelines.
- Critical embedded software should use static checking tools with a defined and appropriate set of rules, and should have zero warnings from those tools.

- Every line of critical embedded software should be peer reviewed via a process that includes a physical face-to-face meeting and that produces an auditable peer review report.
- Accesses to variables shared among multiple threads of execution must be protected via disabling interrupts, using a mutex, or some other rigorously applied concurrency management approach.
- Testing alone is insufficient to ensure safety in critical systems. Other technical approaches and process management approaches must be used to provide a sufficient level of quality assurance.
- Maximum stack depth should be characterized and kept within fixed limits.
- number and severity of violations of these minimum acceptable practices by Toyota has resulted in their ETCS system having significant technical shortcomings, resulting in a reasonable expectation that it will be unsafe in operation

373. The number and severity of violations of the foregoing minimum acceptable practices by Toyota has resulted in their ETCS system having significant technical shortcomings, resulting in a reasonable expectation that it will be unsafe in operation at a rate that is unacceptable to those who design embedded systems for safety critical environment.

374. In addition, during the class period Toyota was replicating UA events and was unable to determine the “root cause,” simply noting that the “root cause was unknown.” A reasonable consumer would consider his car defective if UA events occurred in his or her model but the manufacturer did not know the cause.

1 **1. Electronics Issues:**

2 In addition to the defects listed above, defects in the Subject Vehicles'
3 electronic system which can and sometimes do cause SUA include, but are not
4 limited to:

5 a. The unwarranted and improper safety-critical reliance on
6 electronic engine control and braking systems, including, but not limited to, the
7 ETCS, which lacks a hardware redundant fault tolerant design;

8 b. Unwarranted and improper safety-critical reliance on analog
9 sensor inputs from two similar analog sensors in A) the throttle body assembly, and
10 B) the accelerator pedal assembly, which are subject to failure in various modes;
11

12 c. Unwarranted and improper safety-critical reliance on software
13 running in a single CPU within the vehicle electronic system, which is subject to
14 failure in various modes;
15

16 d. Unwarranted and improper safety-critical reliance on individual
17 hardware components used in the vehicle electronic system;
18

19 e. The susceptibility of the ETCS-i (particularly the wiring
20 harnesses connected to the accelerator pedal position sensors and the throttle position
21 sensors) to currents generated by radio frequency (RF) interference, combined with
22 an improper system for detecting and filtering RF currents;

23 f. The susceptibility of the ETCS-i (particularly the accelerator
24 pedal position sensors) to drops in supply voltage which, in turn, sometimes cause
25 sensor outputs consistent with a request by the driver to fully open the throttle;
26

27 g. The susceptibility of the ETCS-i (particularly the wiring
28 harnesses) to various shorts and faults, including resistive faults which, in turn,

1 sometimes cause sensor outputs consistent with a request by the driver to fully open
2 the throttle;

3 h. The failure to design, assemble and manufacture the ETCS-i
4 wiring harnesses in such a way as to prevent mechanical and environmental stresses
5 from causing various shorts and faults, including resistive faults which, in turn,
6 sometimes cause sensor outputs consistent with a request by the driver to fully open
7 the throttle;
8

9 i. The safety critical reliance on a purported fault detection system
10 that does not always generate and/or recognize faults in the vehicle electronic system
11 as they occur;
12

13 j. The inability of the software running within the ETCS-i to
14 properly self-calibrate when certain changes are detected;

15 k. The failure to design and include an appropriate EDR system
16 which properly records the position of the accelerator, brake, and throttle assembly
17 in order to allow proper examination of SUA events; and
18

19 l. The failure to include properly redundant systems with the ability
20 to cross-check can bus reported accelerator and throttle positions with “actual sensor
21 data.”

22 m. Toyota’s cruise control system fails in ways that cause SUA to
23 occur due to vehicle sensor abnormalities, microcomputer abnormalities, the cruise
24 control switch becomes stuck on the acceleration side, and microcomputer
25 abnormalities occur.
26
27
28

1 **2. Defects in the Accelerator-Pedal-to-ECM Interface.**

2 a. The electrical design of the interface between the engine control module
3 (ECM) and the accelerator pedal in vehicles employing the Toyota ETCS-i electronic
4 throttle control system is vulnerable to certain combinations of resistive shorts that
5 mimic the signal from a fully depressed accelerator pedal. This was first
6 documented by D. Gilbert [3-c] and has been confirmed by Toyota [2-h], NASA
7 [3-d], and the Clemson Vehicular Electronics Laboratory [1-f,g].

8
9 b. These combinations of resistive shorts can occur between adjacent,
10 uninsulated conductors as demonstrated by NASA [3-d] and the Clemson Vehicular
11 Electronics Laboratory [1-a,f,g]. In 2002 – 2006 Toyota Camrys, the pins that would
12 need to become shorted to produce unintended acceleration are positioned next to
13 each other inside the accelerator pedal assembly. In the 2005 and 2008 Camrys that
14 I inspected, the pins were positioned next to each other in the ECM connector as
15 shown in Fig. 1. In a 2008 Toyota Tacoma that I inspected, the pins were positioned
16 next to each other in a connector behind the dash between the accelerator pedal and
17 the ECM [1-g, page 23, 2nd paragraph].
18

19 c. CVEL researchers have demonstrated that the pins in one of the
20 connectors in a 2008 Toyota Tacoma are positioned so that it is possible to produce a
21 wide open throttle simply by dipping conductors with this pin configuration into a
22 capful of salt water [1-g].
23

24 d. The NASA investigation into unintended acceleration [3-d, Fig. 6.6.2.3-
25 5], revealed that the pins inside the accelerator pedals of 2002-2006 Toyota Camrys
26 are also arranged in an order that accommodates the types of faults described by Dr.
27 Gilbert. NASA also found evidence of tin whisker growth in the pedals that they
28

examined, providing a possible explanation for how the faults described by Dr. Gilbert might occur (at least in models employing this particular pedal design).

e. The resistance of salt water that seeps into an automotive connector can readily fall within the range of values necessary to mimic a fully depressed accelerator pedal [1-a,c]. In my opinion, in order to comply with accepted engineering practices for safety critical systems, the VPA and VPA2 accelerator signal pins should not be located next to each other in any connector that is not sealed to prevent salt water intrusion.

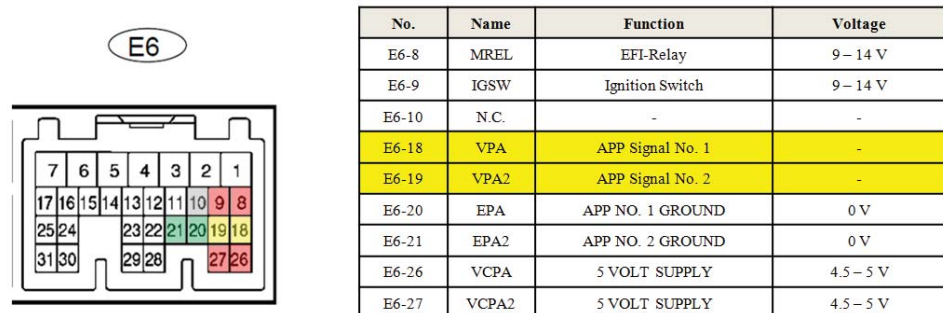


Fig. 1. The pin layout of a 2005-2006 Camry 2AZ-FE ECM side connector

f. Possible sources of salt in an automobile are road salt or sea salt particles that land on surfaces exposed to the air. Possible sources of water include car washes, rain, mist, HVAC systems or condensate (*e.g.*, when a car moves from a cool environment to a hot, humid environment).

g. Tin whiskers can also produce resistive shorts capable of mimicking a fully depressed accelerator pedal as demonstrated by NASA [3-d] and Leidecker [3-e].

h. NASA [3-d] concluded that random tin whisker failures in 2002-2006 Toyota Camrys should produce DTCs and trigger fail-safe mechanisms more often

1 than they result in unintended acceleration. Randomly growing tin whiskers in these
2 pedals are at least 5 times more likely to trigger an error code and a fail-safe
3 mechanism than to mimic a fully-depressed accelerator pedal.

4 i. NASA [3-d] concluded that the timing of tin-whisker connections was
5 critical and that these connections would have to be made within a very short time.
6 This conclusion was drawn based on simulator results. Tests done at CVEL suggest
7 that the first connection could exist for a longer period of time [1-g, Sections IV and
8 VI]. Also experts at NASA Goddard later reported that tin whiskers do not make
9 electrical contact and mechanical contact at the same time and that a sudden jarring
10 or surge in the voltage can simultaneously make or break the electrical contact in
11 whiskers that have already made mechanical contact. Based on these results, that the
12 timing of the first and second tin whisker connections is not as critical as implied in
13 [3-d], and that the odds of experiencing unintended acceleration due to a double
14 resistive fault in a Toyota Camry are greater than originally suggested.

15 j. The accelerator pedals known to be susceptible to tin whisker failures
16 should be replaced or repaired.

17 k. Other manufacturers employ accelerator pedal interfaces that are
18 designed to be less susceptible to resistive faults. For example:

- 19
20 (1) Some vehicles (*e.g.*, 2008 GMC Sierra as shown in Fig. 2)
21 employ an acc-pedal-to-ECM interface with an offset
22 between redundant sensor outputs that varies with the angle
23 of the pedal. This design is less likely to be susceptible to
24 the type of failure described by D. Gilbert and others,
25 because random resistive faults are more likely to deviate
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27
28

from the acceptable range of sensor inputs resulting in voltages that trigger DTCs and fail-safe mechanisms.

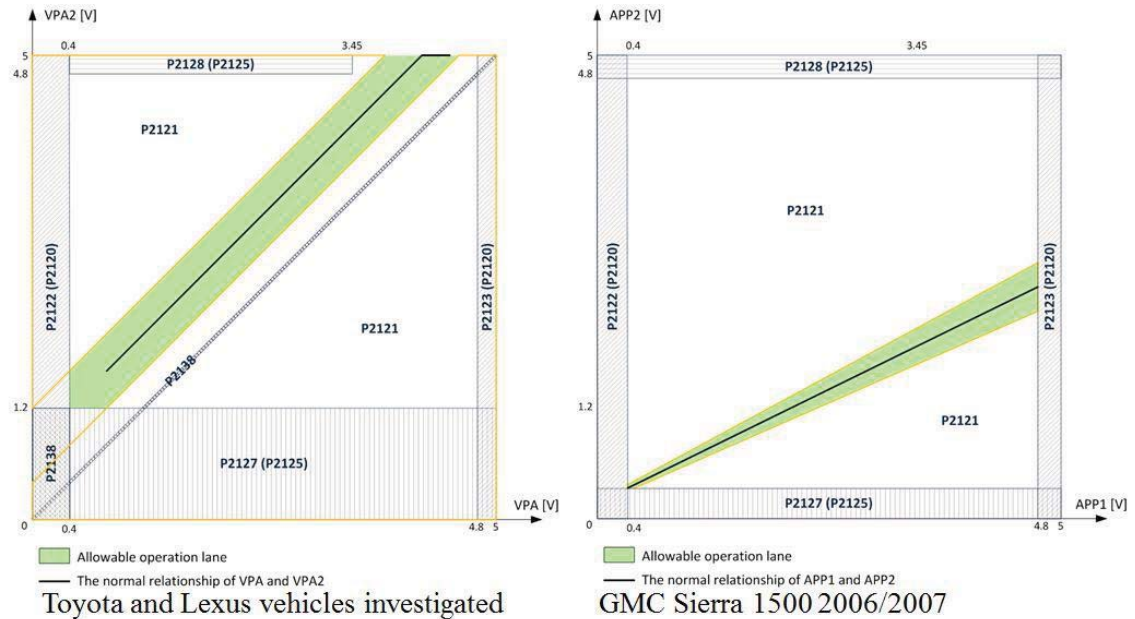


Fig. 2. Valid accelerator pedal sensor voltages for Toyota and GMC Sierra

- (2) Some vehicles (*e.g.*, 2008 GMC Sierra as shown in Fig. 2) employ a narrower range of valid sensor voltages making it less likely that a random fault can go undetected.
- (3) Some vehicles (*e.g.*, 2006 Fords as indicated in Fig. 3) employ an acc-pedal-to-ECM interface where one of the sensor voltages drops while the other sensor voltage increases as the pedal position changes.

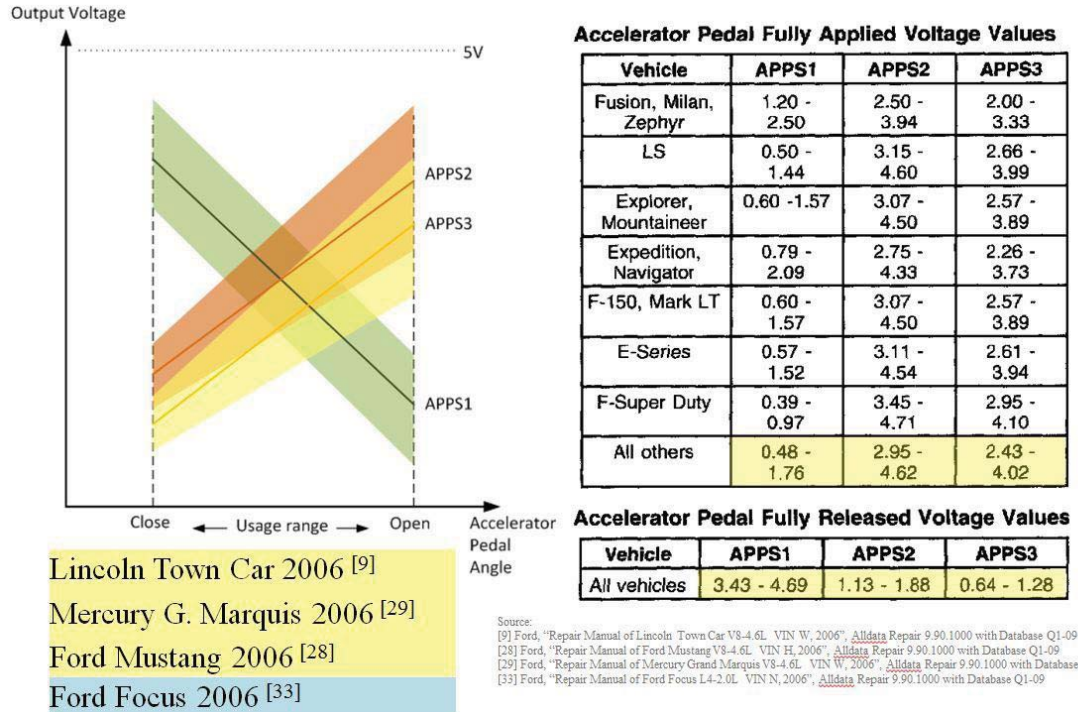


Fig. 3. APP sensor voltages for various 2006 Ford vehicles

- (4) Some vehicles (*e.g.*, 2006 Fords as indicated in Fig. 3) employ an acc-pedal-to-ECM interface with 3 redundant sensors instead of just 2.
- (5) Some vehicles (*e.g.*, the 2008 Dodge Caravan and other Chrysler vehicles) employ an acc-pedal-to-ECM interface where one of the sensor outputs periodically drops to zero briefly, then resumes its position.
- (6) Some vehicles (*e.g.*, Williams WM 526, Volvo) employ an acc-pedal-to-ECM interface where one of the sensor outputs is a pulse-width modulated signal rather than a simple voltage level.

(7) In our investigations to-date, every vehicle other than vehicles employing the Toyota ETCS-i system has employed one of the safeguards above.

(8) As a result of the foregoing the Toyota ETCS-i acc-pedal-to-ECM interface is more vulnerable to unintended acceleration caused by resistive shorts (*e.g.*, due to tin whiskers, salt-water contamination or sensor failures) than any other interface we've evaluated. It is the only system we've seen that employs a constant voltage offset between the sensors without implementing any of the safeguards described in 1a-f.

3. Cruise Control Interface

a. The cruise control interface on the Toyota vehicles that we examined employs a single wire that runs from the cruise control switches to the ECM. The ECM determines which of 5 states the switch is in (ON, OFF, SET, RESUME, CANCEL) by determining the voltage dropped across the switch's resistance. Because long wires without an adjacent signal return wire are vulnerable to induced radio frequency or transient noise, any cruise control interface that employs a single wire interface is inherently more susceptible to electromagnetic interference than designs that employ separate binary inputs [1-h]. The long wire can behave as an antenna that picks up electric fields in the environment and delivers them to the input of the of the ECM's microcontroller. Since the microcontroller's input impedance is relatively high, simply filtering the input is a relatively ineffective solution. Also, since the microcontroller must determine which of 5 possible voltage ranges exist at

1 the input, this input is more susceptible to noise than inputs that simply distinguish
2 between an ON or OFF state.

3 b. Other cruise control interface designs employ more than one wire,
4 which is more expensive, but also more reliable. Prior to cableless electronic throttle
5 controls, it was common for a vehicle to employ a separate cruise control module
6 with multiple-wire interfaces. For example, the 1994 Toyota Camry employed 2
7 wires. Many other vehicles employed 4 wires.

9 **4. ECM Malfunction**

10 a. Microcontrollers, the computers that operate the electronic controls in
11 an automobile, can behave unpredictably when they experience momentary dips in
12 their power supply voltage (1-k), experience unplanned combinations of input
13 values, or experience buffer overloads that rewrite portions of memory.

14 b. It is not possible to fully anticipate all possible outcomes to all possible
15 situations, so a single electronic system should never be given full control of a safety
16 critical actuator. The engine control module in the Toyota ETCS-i systems is
17 responsible for both running the engine and for controlling the throttle position.
18 While the engine control module does have two microcontrollers that are capable of
19 detecting problems and closing the throttle, these microcontrollers are on the same
20 board and share the same power supply. If the engine control module decides that
21 the throttle should be opened, there is no independent means for the operator of the
22 vehicle to close it.

23 c. Many of the reported incidents of unintended acceleration in the
24 NHTSA database appear to be consistent with symptoms of an electronic control
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27
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1 malfunction caused by a software problem or a processor's inability to handle an
2 unexpected input. It is particularly likely in situations where:

3 (1) Acceleration is accompanied by a light on the dash indicating an
4 electronic system error (*e.g.*, NHTSA ODI#'s 10445439, 10445422,
5 10411637, 10408509, 10323466).

6 (2) The engine races when shifted out of drive, but the problem can't
7 be duplicated after the car is powered down and restarted (*e.g.*,
8 NHTSA ODI#'s 10342580, 10317718, 10316603, 10306596,
9 10350652 , 10320766, 10445422).

10
11 d. Electronic control malfunctions are also likely to be a factor in accidents
12 where the data recorded by the event data recorder is inconsistent with itself or with
13 the known physically verifiable parameters of the accident. Since the event data
14 recorder is a snapshot of the system status as perceived by the engine control
15 module, inconsistent event data recorder information strongly suggests that the
16 engine control module was not performing as it was supposed to or that it was
17 working with bad sensor data.)
18

19 e. Electronic failures due to software errors or recoverable hardware
20 failures can be extremely difficult uncover by testing. A much better approach is to
21 assume that they may happen and develop a strategy for handling them when they
22 occur.
23

24 f. One possible strategy for dealing with failures in a processor that
25 controls an engine's throttle is to provide the driver with an alternative method for
26 closing the throttle, or stopping or disengaging the engine. The alternative method
27 should not require the participation of the failed processor.
28

1 **5. Mechanical Issues:**

2 Upon information and belief, certain mechanical defects in the Subject
3 Vehicles which can and sometimes do cause SUA include, but are not limited to:

4 a. The propensity for mechanical involvement and interference
5 between the accelerator pedal and the Subject Vehicles' floor mats which can cause
6 the pedal to become stuck and remain depressed, keeping the throttle open despite
7 the operator's application of the brake pedal, resulting in unintended acceleration;

8 b. Mechanical resistance that can cause the accelerator pedal to
9 become stuck in a fully or partially depressed position and to fail to return to its idle
10 position (referred by Toyota as a "sticky pedal"), resulting in unintended acceleration;

11 c. Floor mat interference in all Toyota vehicles, recognized as early
12 as 2000 when Toyota recalled 1999-2000 model years Lexus LS 200 for SUA-floor
13 mat issues in the UK and again in 2007 when internally Toyota recognized floor
14 mats could be an issue in all vehicles⁶⁹; Toyota should also have realized by
15 December 2005 it was more likely than other manufacturers to have pedal
16 entrapment issues, whether from movement of the mat or double stacking. Toyota
17 should have investigated whether it's accelerator pedal design (hanging) had
18 sufficient clearance even if the mat was out of place or was stacked or flipped –
19 circumstances that Toyota knew were occurring and likely to continue occurring
20 without a design change to increase the clearance. Toyota vehicles were the subject
21 of pedal entrapment recalls or investigations in 2000 (Lexus LS in United Kingdom),
22 2003 (Celica in Canada), 2005 (Lexus IS in United States), 2005 (Prius pedal
23
24
25
26

27

28 ⁶⁹ TOY-MDLID00002839.

1 entrapment reports from NHTSA), 2006 (Highlander in United States), 2007 (Lexus
2 ES and Camry AWM in United States), 2009 (Sienna in United States) and finally a
3 recall of 2 million vehicles in 2009, expanded by an additional 1.1 million vehicles
4 in 2010, where the pedal was shortened and some vehicles floor wells were modified
5 to provide additional clearance in case there was mat movement or stacking. Toyota
6 vehicles suffered from pedal and geometry design flaws such as insufficient
7 clearance between the accelerator pedal and the mat and other floor well design
8 flaws that made it more likely Toyota vehicles would suffer from pedal entrapment
9 than other manufacturers;
10

11 d. Mechanical resistance which can cause the throttle body or
12 throttle plate to become stuck in a fully or partially open position resulting in
13 unintended acceleration; and
14

15 e. The gap between pedals is 20mm smaller on certain models
16 including but not limited to the RAV4 and Venza models, which contributed to UA;⁷⁰
17 and
18

19 f. Corrosion or carbon build up that leads to a stuck throttle body
20 resulting in SUA.

21 **6. The lack of an appropriate fail-safe:**

22 Toyota was aware the SUA events were caused by any of the above in a given
23 Defective Vehicle, but Toyota could not predict which of the faults listed above
24 caused a SUA event in any given vehicle. Toyota could not identify the root cause
25
26
27

28 ⁷⁰ TOY-MDLID00041201T000.

1 of most SUA events. This made it critically important for Toyota to have an
2 adequate fail-safe. The Defective Toyotas did not have an adequate fail-safe due to:

3 a. The unwarranted and improper reliance on safety-critical but
4 untested or improperly tested “failsafe strategies” ostensibly designed to detect faults
5 in the vehicle electronic systems and prevent those faults from causing SUA. These
6 “failsafe strategies” can and sometimes do fail to recognize fault conditions which, if
7 left unchecked, result in unintended acceleration and record no direct evidence of the
8 fault that initially triggered the unintended acceleration event;
9

10 b. The lack of a proper “brake-override system” or other “fail-safe”
11 logic that would close the throttle while allowing the brakes to be applied in the
12 event the vehicles’ electronic systems received commands to open the throttle and
13 apply the brakes simultaneously;
14

15 c. The lack of a hardware-redundant fault tolerant electronic engine
16 control and braking system such as those employed by other vehicle manufacturers;
17

18 d. The lack of enough memory in the computer systems of certain
19 models to accommodate a brake-override system;

20 e. The lack of a proper ignition shut off in the event of a SUA event.
21 NHTSA identified this as a problem as early as August 2007 when it notified Toyota
22 that it was considering requiring a public service announcement to inform the public
23 “how to shut off the vehicle with the push button start,” meaning consumers did not
24 understand that it takes three seconds for the shut off to occur. Toyota was not only
25 aware of the problem it also failed to implement a kill switch;
26
27
28

1 f. The lack of a proper fault detection system that would recognize a
2 SUA event, or surge, or RPM run up beyond the maximum design tolerance and
3 respond by shutting down the throttle; and

4 g. The lack of an appropriate layout in the transmission system. In
5 many of the vehicles the shift system is confusing and results in drivers experiencing
6 a SUA event mistakenly placing the transmission in “D” when they thought they
7 were placing the transmission in “N.”
8

9 **7. Failure to appropriately test and validate the vehicle systems:**

10 a. An inability to identify the root cause for SUA. As alleged
11 above, Toyota has been aware since 2002 that its vehicles with ETCS have the
12 potential for SUA or “surging” at a rate that exceeds that in manually controlled
13 vehicles. Toyota has been unable to find the root cause of the problem. In a 2002
14 Toyota Field Technical Report, Toyota acknowledged that “[t]he root cause for
15 ‘surging’ remains unknown” and thus “[n]o known remedy exists for the ‘surging’
16 condition at this time.”⁷¹ In 2010, Toyota still had not tested its ETCS as a possible
17 cause of SUA, as it had to hire Exponent to answer Congress’ inquiry over what
18 proof Toyota had to show its ETCS did not cause SUA. As Congressman Waxman
19 observed:
20
21

22 The results of our investigation raise serious questions.

23 Toyota has repeatedly told the public that it has conducted
24 extensive testing of its vehicles for electronic defects. We
25 can find no basis for these assertions. Toyota’s assertions
26

27
28 ⁷¹ TOY-MDLID00062906.

1 may be good public relations, but they don't appear to be
2 true.

3 b. The faults and defects in Toyota's safety critical vehicle
4 electronic systems described above show that Toyota has not properly tested or
5 validated these systems individually or as a whole; and
6

7 c. Moreover, Toyota has failed to verify that all electronic vehicle
8 systems capable of requesting torque are robust enough, and contain sufficient
9 redundancies to prevent SUA events.

10 **8. Over the years Toyota has identified parts that failed and other**
11 **problems leading to UA incidents.**

12 375. In Toyota Field Technical Reports ("FTR") Toyota has identified
13 numerous part failures that caused UA and are defective:

14 a. Defective throttle bodies cause UA and engine surge.
15 The root cause of the surging is often unknown. But
16 the fact that surges cause UA is admitted in FTRs.
17 *See, e.g., MDLID00062906.*
18

19
20 b. UA is also caused by the use of aluminum
21 electrolytic capacitors which is not recommended
22 for safety-implicated environments. Such
23 capacitors have the potential to lose capacity, the
24 potential is heightened by environmental conditions
25 such as high heat and humidity, when these
26
27
28

1 capacitors dry out they do not filter out EMI which
2 in turn can cause UA.

- 3
4 c. UAs have also been observed by Toyota employees
5 resulting from a software failure as follows:
6

7
8 When driving vehicle at approx. 40mph on level
9 ground and after the vehicle's transmission has
10 shifted into 5th gear, when just beginning to go up a
11 small, steady incline (at least a 20% grade or more),
12 if the vehicle's accelerator is slightly depressed, and
13 the vehicle's engine load is increased, the engine
14 begins to 'surge' or 'buck' as if it has a lean-misfire.
15 There are no misfires present and everything in the
16 data looks good.
17

18
19 This is the 2nd 'customer's' vehicle we have
20 encountered with this situation. We also confirmed
21 two other new Sequoias on the dealer lot that do it
22 also. A field engineer with S.E.T. inspected the
23 other customer's vehicle, and we even installed two
24 transmissions and torque converters, and this
25 condition persists. I was then told that it cannot be
26 repaired. We have made no attempt to repair this
27
28

1 particular vehicle due to the outcome of the of the
2 other similar situation.

3
4 It seems that this is a software issue of the engine
5 control unit. When the vehicle's load is increased in
6 the uphill climb situation, the engine does not seem
7 to have the proper amount of fuel delivery to
8 maintain a smooth acceleration (or steady speed). It
9 feels almost as if it is an older vehicle that is
10 equipped with a malfunctioning EGR system.
11
12

13
14 d. UA is also caused by a defect in the operation of the
15 throttle – the exact cause is unknown. *See, e.g.,*
16 MDL1007132.

17
18 e. Subject vehicles were also prone to intermittent
19 UA's the cause of which cannot be known due to
20 intermittent nature of electrical failures.
21

22
23 f. Dirty throttles cause UA.

24
25 g. UA is caused by tin whiskers.
26
27
28

1 h. The cause of a UA is often unknown but the fact of a
2 UA is confirmed by Toyota. For example in many
3 FTR's the witnesses' complaint is "duplicated by
4 Toyota or dealers." The company identifies a
5 "probable cause" whose "root cause is unknown." It
6 replaces a part it and has no idea why the part failed
7 or caused UA. *See, e.g.*, MDL00698031.

10 i. UA can also be caused by a crack in the A/F sensor
11 or other failures of the A/F sensor.

14 j, UA is also caused by accelerator pedal assembly part
15 7811007010.

17 k. A failure of the throttle control monitor causes UA.

20 l. Toyota has confirmed a UA defect described as a
21 failure "in the ECU properties."

23 m. Logic errors in the ECU can cause UA.

25 n. ECM logic errors cause UA.

28 o. Internal failures of the ECM can cause UA.

- 1
- 2 p. Failure of the air fuel ratio sensor causes UA.
- 3
- 4 q. Incorrect resistance change in the pedal position sensor can cause
- 5 UA.
- 6
- 7
- 8 r. A stuck boiling wire under the throttle plate can cause UA.
- 9
- 10 s. Errors in software program of ISC of engine ECU,
- 11 including errors in calculation for a gradual
- 12 reduction process of engine rotation when the heater
- 13 idling up control is released.
- 14

15 **9. Vehicles were produced in a system with defects in quality control.**

16 376. The foregoing defects resulted in part from a serious lapse of good

17 manufacturing practices including:

- 18
- 19 • failure to devote sufficient priority in quality
- 20 management to the accelerator pedal that occasioned
- 21 a massive recall.
- 22 • not rigorous enough in monitoring quality
- 23 performance in the field after ... putting models into
- 24 mass production.
- 25 • not rigorous in conducting design reviews ... the
- 26 resultant problem of sticky pedals was a typical
- 27
- 28

1 instance of failing to grasp the consequences of
2 changes in specifications.

- 3 • inadequate training of dealers' maintenance and
4 repair personnel.
- 5 • inadequacy of quality and safety updates.
- 6 • defective design work passed into mass production
7 and escaped detection in design reviews based on
8 failure mode.
- 9 • did not respond proactively to accidents involving
10 fatalities.
- 11 • did not pay attention to the customer complaints
12 received by NHTSA.
- 13 • lacked sufficient capacity for conducting onsite
14 investigations promptly.
- 15 • lacked adequate capacity for follow-up information
16 gathering.
- 17 • had generally inadequate training for personnel in
18 overseas markets.
- 19 • failed to probe in its search for root causes.
- 20 • lacked clear guidelines for prioritizing problems by
21 severity.

22 377. Among the factors that dissuaded Toyota from "acting more
23 proactively":
24
25
26
27
28

1 the discovery of a defect ... would imply the existence of
2 the same defect in other vehicles, and that could occasion a
3 surge of complaints and necessitate a technical response.

4 378. All of the foregoing have been identified by Toyota as failures that
5 cause UA. Toyota apparently has no idea why these failures cause UA and hence
6 has not fixed the potential for these defects to cause UA in any given vehicle.
7

8 **L. Toyota Belatedly Installs a Limited Brake-Override as a “Confidence”**
9 **Booster**

10 379. Toyota began facing complaints of runaway cars years ago, but the
11 company did not install “brake-override” systems in those vehicles, even as several
12 other automakers deployed the technology to address such malfunctions.

13 380. The brake-override systems allow a driver to stop a car with the
14 footbrake even if the accelerator is depressed and the vehicle is running at full
15 throttle. The systems are an outgrowth of new electronics in cars, specifically in
16 engine control.
17

18 381. “If the brake and the accelerator are in an argument, the brake wins,” a
19 spokesman at Chrysler said in describing the systems, which it began installing in
20 2003.

21 382. In 2008, in a “Secret” “Don’t Forward” email, one TMC executive
22 informed Tinto that he had been given “homework” to know “which competitor[s]
23 vehicles actually have a throttle control system which can prevent the unwanted
24 acceleration caused by simultaneous application on both the accel and brake
25 pedal.”⁷²
26

27
28 ⁷² TOY-MDLID00123973.

1 383. By January 29, 2010, TMS had concluded that a brake-override was
2 needed but had not been approved by TMC.⁷³

3 “We have officially asked TMC for brake over-ride
4 software as part of this campaign but have been rejected.
5 We continue to push. What are your views.” “We would
6 also like the software but time is really the issue.” “We are
7 100% with you on the over ride software ... we need to
8 strategize how best to approach this with TMC. I have
9 been turned down twice this [sic] week. I will send you
10 their response saying that because this pedal sticking issue
11 is not at Wide Open Position the software would not detect
12 the accel!! If this is the case they need to revisit their
13 programmers!!

14
15
16 384. Shockingly, given the potential gravity of SUA events, internal
17 documents reveal Toyota knew it needed a brake-override years earlier:⁷⁴

18 **Subject:** Important information: America ES350
19 article...addition #2

20
21 **From:** Koji Sakakibara@toyota.com

22 **Date:** Tue. 1 Sep 2009 16.16.01 -0700

23 **To:** yoshioka@mail.tec.toyota.cojp. Shunsuka Noguchi
24 syun@nano.tec.toyota.cojp.
25

26
27 ⁷³ TOY-MDLID000135646.

28 ⁷⁴ TOY-MDLID00041130T-0001.

rkitsura@mail.tec.toyota.coj.

Kako kako@email.tec.toyota.cojp>

cc: Kato maktoh@mail.tec.toyota.cojp,

Hirokazu.Sakamoto@toyota.com,

Koji_Takara@toyota.com,

Keiichi_Fukushima@toyota.com,

washino@mail.tec.toyota.cojp,

jamagush@earth.tec.toyota.cojp, r-

Kawamu@earth.tec.toyota.cojp,

y_yamai@email.tec.toyota.cjp. Kanamori

kanamori@earth.tec.toyota.cojp,

ssakamt@earth.tec.toyota.cojp,

joji@giga.tec.toyota.cojp

To all concerned staff,

Thank you for your continued business. I am Sakakibara
from TEC-2Gr, COE-LA.

- The following information has been received from TMS-
POSS Public Affairs Group regarding the above (America
ES350 article...addition #2). (Please see photos at the
bottom of this mail.)

1 - During the floor mat sticking issue of 2007, TMS
2 suggested that there should be *“a fail safe option similar to*
3 *that used by other companies to prevent unintended*
4 *acceleration.” I remember being told by the accelerator*
5 *pedal section Project General Manager at the time (Mr. M)*
6 *that “This kind of system will be investigated by Toyota,*
7 *not by Body Engineering Div.” Also, that information*
8 *concerning the sequential inclusion of a fail safe system*
9 *would be given by Toyota to NHTSA when Toyota was*
10 *invited in 2008. (The NHTSA knows that Audi as adopted*
11 *a system that closes the throttle when the brakes are*
12 *applied and that GM will also introduce such a system.)*

13
14
15
16 =>In light of the information that “2 minutes before the
17 crash an occupant made a call to 911 stating that the
18 accelerator pedal was stuck and the vehicle would not
19 stop.” I think that Body Engineering Div. should act
20 proactively first (investigate issues such as whether the
21 accelerator assy [sic] structure is the cause, how to secure
22 the floor mats, the timing for introducing shape
23 improvements).

24
25
26
27 - Furthermore, taking into account the circumstances that
28 “in this event a police officer and his entire family

1 including his child died.” TMS-POSS Public Affairs
2 Group thinks that “the NHTSA and USA public already
3 hold very harsh opinions in regards to Toyota.” (As I think
4 you know, in some cases in the USA “killing a police
5 officer means the death penalty.”)
6

7
8 - In light of the above, it would not be an exaggeration to
9 say that even more than the nuance of the information
10 passed from Customer Quality Engineering Div. External
11 Relations Dept. to Body Engineering Div.,” the NHTSA is
12 furious over Toyota’s handling of things, including the
13 previous Tacoma and ES issues.” [Emphasis added.]
14

15 385. Toyota’s frequent response to a claim of SUA is driver error. However,
16 by September 2008, internally in a “Secret” “Don’t Forward” email, Toyota was
17 acknowledging that based on a survey of UA events in the past, a certain number of
18 SUA events could be prevented by implementation of a “control system,” *i.e.*, brake-
19 override or fail-safe.⁷⁵
20

21 386. The importance of a brake-override is magnified due to the fact Toyota
22 knew, from customer complaints, that in a long term SUA event vacuum is not
23 supplied to the brake booster which results in a loss of braking power. Many of the
24 vehicles experiencing long term SUA are found to have brakes burned or brake pads
25
26

27
28 ⁷⁵ TOY-MDLID000148163.

1 “completely depleted.”⁷⁶ However, with a brake-override the throttle valve closes
2 restoring vacuum assist and braking is not lost or severely diminished, a dramatic
3 and perhaps lifesaving difference.

4 387. Volkswagen, Audi, BMW and Mercedes-Benz also install such systems
5 in at least some of their cars, some as far back as 10 years ago. Nissan has been
6 using brake-override since 2004. Infiniti also has such a system. General Motors
7 installs brake-override in all of its cars in which it is possible for the engine at full
8 throttle to overwhelm the brakes.

9
10 388. Internally Toyota has acknowledged that the Saylor accident would not
11 have occurred if Toyota had installed BOS. “If Toyota were asked ‘Could the San
12 Diego accident not have been avoided if the BOS has been implemented?’ Toyota
13 has to say YES; so one can say that it should have been ready at an early stage.”

14
15 389. James Lentz, President and CEO of Toyota Motor Sales USA, admitted
16 in his deposition testimony on March 16, 2012, that brake override would have
17 prevented the fatal Saylor crash:

18 Q. And if the Saylor vehicle had had brake override
19 system, would you agreed that the accident would
20 not have happened?...

21 [Toyota counsel objection]

22 A. I don’t know that the-

23 [Toyota counsel objection]

24 A. I don’t know.

25
26
27
28 ⁷⁶ TOY-MDLID000137601.

1 Q. Well in the Saylor accident, assume that there was
2 pressure on the pedal and it was trapped, as you've
3 said, and if there was brake override and the driver
4 had pressed the brake pedal at that point, the power
5 to the throttle would have been cut; correct?
6

7 [Toyota counsel objection]

8 A. My understanding based on how brake override
9 should operate, that it would have stopped the car.

10 Lentz Dep. 14:18 – 15:15, March 16, 2012.

11 390. It is estimated that it would cost \$1 million in development costs –
12 typically less than \$1 per vehicle – to add a minimal BOS .
13

14 391. On December 5, 2010, TMS announced it will install brake-overrides in
15 2011 vehicles.

16 392. On February 22, 2010, TMC announced that it would install a brake-
17 override system on an expanded range of customers' vehicles to provide an
18 additional "measure of confidence." According to the announcement, this braking
19 system enhancement will automatically reduce engine power when the brake pedal
20 and the accelerator pedal are applied simultaneously under certain driving
21 conditions.
22

23 393. The following models were eligible for the brake-override "confidence"
24 upgrade: 2005-2010 Tacoma, 2009-2010 Venza, 2008-2010 Sequoia, 2007-2010
25 Camry, 2005-2010 Avalon, 2007-2010 Lexus ES 350, 2006-2010 IS 350 and 2006-
26 2010 IS 250 models.
27
28

1 394. “Expansion of this brake override system underscores Toyota’s
2 commitment to building the safest and most reliable vehicles on the road, as we have
3 for 50 years, and to ensuring that our customers have complete confidence in the
4 vehicles they drive,” said Jim Lentz, President and Chief Operating Officer of TMS.
5 Lentz did not address why this commitment to quality did not result in a brake-
6 override being installed as early as 2002 when SUA complaints were received.
7 Lentz did not explain why millions of other Toyota vehicles, such as the model year
8 2002-2006 Camrys, would not be eligible for the brake-override.
9

10 395. Importantly, the brake-override was not announced as a “Safety Recall.”
11 Rather, it was implemented to boost consumer “confidence.” And the confidence
12 booster is not being installed in all models with the SUA defect, such as the 2002-
13 2006 Camrys.
14

15 396. In view of the propensity of UA Toyota’s vehicles to suddenly
16 accelerate out of the drivers’ control, each vehicle was defective for failure to have
17 an appropriate fail safe. Toyota identified each of these fail safes yet failed to
18 implement them in a timely fashion as reflected in an internal “Privileged and
19 Confidential” e-mail:
20

21 Push Button Ignition

22 One of the ways to stop a “runaway” vehicle is to shut off
23 the engine while the vehicle is in motion. NHTSA is
24 concerned that owners are unclear how to shut off the
25 engine when the vehicle is in motion. In addition, the
26 ES350 owners manual is unclear (see attached letter re:
27 Pepski Petition). NHTSA has surveyed ES350 owners and
28

1 informed me that they believe their data indicates owners
2 are not familiar with the Toyota functionality. The Toyota
3 Smart Key System requires the operator to hold the ignition
4 button for 3 seconds to shut off the engine when the vehicle
5 is in motion. When the vehicle is stopped, a momentary
6 press of the ignition button shuts off the engine. NHTSA
7 has reports that some owners tried tapping the ignition
8 button to shut it off instead of holding it for three seconds.
9 While they do not believe this is the correct method, they
10 have been working with the SAE to develop a standard for
11 keyless ignition systems. But it is important to note that
12 they think it is one of the attributes that may lead to the
13 occurrence of the long-duration, high speed events.
14
15

16 Sequential Shift Transmission

17 Another way to stop a runaway vehicle is by placing the
18 transmission in Neutral. NHTSA is concerned that the
19 layout of the Sequential Shift Transmission may confuse the
20 operator (especially in a panic situation) because the “N” is
21 adjacent to the “+.” To the left of the D position is a gated
22 area where the shift lever can be pushed forward to upshift,
23 and pulled back for a downshift. The N position is above
24 the D position. In such a layout, the “+” and the “N” are very
25 close to the same longitudinal position, with the “+” closer
26
27
28

1 to the driver. If, NHTSA supposes, the transmission was in
2 the Sequential Shift mode, the driver could confuse the
3 upshift position for the neutral position. They believe that
4 in a panic situation, there is a chance this could occur.
5

6 7 Braking Effectiveness

8 With an accelerator pedal stuck at wide open throttle,
9 NHTSA agrees that one forceful application of the brake
10 pedal can safely stop the vehicle. However, in many
11 reports and inspections they have found brakes burned or
12 brake pads completely depleted after the event. NHTSA
13 understands that with the engine at wide open throttle,
14 vacuum is not being supplied to the brake booster. This
15 means that the power braking system has potentially two or
16 three applications left before the vacuum assist is depleted.
17 They believe that in the long duration events, the brake
18 booster is being depleted by the driver. They think that the
19 driver that initially experiences the event recognizes the
20 vehicle is accelerating and presses the brakes. The vehicle
21 slows, so the driver releases the brakes and the vehicle
22 accelerates again. They repeat this process and before they
23 realize, the power assist is lost and the vehicle becomes
24 more difficult to stop. The driver applies the brake pedal
25
26
27
28

1 with a lot of force, and this can result in severe damage to
2 the braking system, and/or a brake fire.

3 397. In a January 22, 2010 internal email, Toyota Canada, admitted that due
4 to the UA issues created by floor mats and gas pedals there was “logic” in that a
5 “brake over-ride would be effective in any failures to prevent accidents. TC wanted
6 us to employ it as soon as possible.”
7

8 398. Toyota’s correct BOS will not work in the event of a failure of the ECM
9 since it is installed in the ECM. A BOS implemented on an independent
10 microcontroller would protect against UA due to processor failures in the ECM.

11 **M. The Defects Causing Unintended Accelerations Have Caused Defective**
12 **Vehicles’ Values to Plummet**

13 399. A car purchased or leased under the reasonable assumption that it is
14 “safe” as advertised is worth more than a car known to be subject to the risk of an
15 uncontrollable and possibly life-threatening SUA event. A car purchased under the
16 assumption that it was produced in conformity to Toyota’s QRD promise is
17 worthless than a car produced in a system that promoted speed over quality. All
18 purchasers of the Defective Vehicles overpaid for their cars at the time of purchase.
19 As news of the SUA defect and Toyota’s quality control issues surfaced in late 2009
20 and early 2010, the value of Toyota vehicles have materially diminished. As a result
21 of safety and quality concerns some class members attempted to return their vehicles
22 due to the fear of a SUA event. Toyota has uniformly refused to refund the price of a
23 vehicle for any Plaintiff or class member who sought to return the vehicle.
24
25

26 400. The economic loss suffered by class members is revealed by the
27 following few examples. From the start of the spring through the summer of 2009, the
28

1 value of the 2007 Toyota Camry LE and the 2007 Nissan Altima stayed consistent
2 with each other, depreciating \$438 and \$295 respectively through these five months
3 (April 09-Aug 09). As news of the Camry recall started to spread, however, the
4 Camry took a nose dive, losing nearly 2.5 times the loss in value of its competitor, the
5 2007 Nissan Altima. More staggering is that the Camry lost \$400 in value from
6 January-April 2010 when almost every used vehicle historically gains significant
7 value during these months. By March 2010, the delta between the Nissan and the
8 Camry was over \$1,200.

10 401. From April 2009 through September 2009, the Corolla increased in
11 value over its competitor, the Nissan and the Sentra by \$210. However, as the storm
12 clouds started to gather over the rest of the Toyota line, the trend reversed. During
13 the next seven months, the Sentra only dropped \$174 in value, while the Corolla
14 dropped \$839. This is a difference of \$665. The change in this trend resulted in an
15 \$875 negative swing for the Corolla versus the Sentra in a year's time, a decrease in
16 value for the Corolla of almost four times that of the Sentra.

18 402. From April 2009 through August 2009, the Toyota RAV4 increased in
19 value over its competitor the Honda CRV by \$472. But as the Toyota problems
20 continued, this trend also reversed. During the next eight months, the CRV dropped
21 \$1,273 in value, while the RAV4 dropped \$2,206. This is a net difference of \$933.
22 The change in this trend resulted in a \$1,405 negative swing for the RAV4 versus the
23 CRV in a year's time. Other examples abound. If one compares on a rough basis the
24 value of the 2008 Camry from September 2009 through August 2010 it suffered a
25 17% drop compared to comparable vehicles. The 2006 Tundra 4.5%. The 2009
26 Camry 23%.

1 403. Kelley Blue Book and the NADA Used Car Guide, two high profile
2 used vehicle value guide books, have lowered the values of used Toyota models
3 included in the recall.

4 404. Kelley Blue Book (“KBB”) is the United States’ largest automotive
5 vehicle valuation company. The company’s website is a source for new and used
6 vehicle pricing and information for consumers. The company has become so
7 identified with its services that the trademarked terms “Blue Book” and “Blue Book
8 Value” are commonly understood to mean a car’s market value.

9
10 405. On February 8, 2010, KBB announced that it was dropping the values of
11 used, recalled vehicles by up to three percent. KBB also noted that “[a] growing
12 inventory of used Toyota vehicles, coupled with a reduction in demand, however
13 slight, only leads to the potential for further devaluation.”

14
15 406. KBB further lowered the estimated value of recalled Toyotas by another
16 1.5% on February 12, 2010.

17 407. The National Automotive Dealers Association (“NADA”) represents
18 more than 19,700 new car and truck dealers, both domestic and international, with
19 more than 43,000 separate franchises. NADA serves dealers by following pricing
20 trends on new and used vehicles and is an advocacy association which represents
21 dealerships before the U.S. Congress and other government agencies. In addition to
22 the advocacy provided on behalf of auto dealers, the NADA is one of the primary
23 organizations offering pricing for cars, both new and old. Automotive sales
24 companies use NADA guides to determine wholesale and trade-in values to purchase
25 trade-ins and to buy vehicles at auction before determining a retail sales price.
26
27
28

1 408. NADA also reported declining values for recalled Toyota vehicles and
2 noted a spill over into all Toyota models:

3 **Toyota Recall: Initial Observations and Short-Term**
4 **Impact on Wholesale Values**

5
6 The facts surrounding the current recall of over 2 million
7 Toyota models for unintended acceleration continues to
8 change day to day and quality concerns are quickly spilling
9 over to other models, with the Prius being the next vehicle
10 in question. As more models and quality problems surface
11 consumers are more likely to incorporate this information
12 on the Toyota brand as a whole thereby reducing consumer
13 confidence in the brand. Clearly the repercussions of this
14 recall are going to result in a disruption in remarketing
15 used models as well as price performance. In fact, Toyota
16 themselves are expecting a decline in value of their current
17 lease portfolio from the negative perception of the recall
18 which will shift demand away from Toyota products or at
19 the very least drive down prices for used models entering
20 the wholesale and retail markets.
21
22
23
24

25 NADA's analysis of last week's auction performance for
26 Toyota was largely inconclusive at this time, however
27 volumes were down on newer models and there was some
28

1 above average softness in prices on newer models (2008-
2 2009). Meanwhile, not surprisingly, auction volume is
3 down ~23% week over week as many Toyota models have
4 been sidelined from the lanes based on recommendations
5 from NAAA. On the retail side Toyota has also shown
6 some early softness with prices dropping by slightly over
7 3% compared to a slight increase in retail prices for Honda
8 models.
9

10 409. These declines in value reflect the fact that purchasers and lessees paid
11 more for the car, through a higher purchase price or higher lease payments, than they
12 would have had the defects and non-conformities been disclosed. In addition to
13 being tied to a defective vehicle and having paid a higher rate than would have been
14 the case if the defects were disclosed, lessees can, in some cases, end up paying for
15 the difference in projected residual value and actual or realized value (*e.g.*, early
16 termination clauses; open-end leases) at the end of their leases. In these situations,
17 lessees must come out of pocket to pay for the diminution in value caused by the
18 partial disclosure of the SUA and brake-override defects to terminate their leases.
19
20

21 **N. Choice of Law Allegations**

22 410. TMS is headquartered in Torrance, California. According to a Toyota
23 brochure regarding its United States Operations 2009, TMS is “Toyota’s U.S. sales
24 and marketing arm,” which “oversees sales and other operations in 49 states.”⁷⁷
25
26
27

28 ⁷⁷ http://pressroom.toyota.com/pr/tms/document/TNA_OPS_MAP_2009.pdf.

1 411. Toyota does substantial business in California, with a significant portion
2 of the proposed Nationwide Class located in California. For example, approximately
3 18% of Toyotas were sold in California⁷⁸ and 16% of Lexus vehicles were sold or
4 leased in California.
5

6 412. California hosts a significant number of Toyota's U.S. operations. In
7 California, Toyota maintains both Toyota and Lexus Sales and Service Offices,
8 Financial Service Offices, Manufacturing Facilities, a Research and Development
9 Center, and a Design Center. Also, Toyota Motor Engineering and Manufacturing
10 North America, Inc. is headquartered in Kentucky, but has major operations in
11 Torrance, California, as well as in Michigan and Arizona.
12
13

14 413. In addition, the conduct that forms the basis for each and every class
15 members' claims against Toyota emanated from TMS' headquarters in Torrance,
16 California.
17

18 414. Toyota personnel responsible for customer communications are located
19 at TMS' California headquarters, and the core decision not to disclose the sudden
20 acceleration defect to consumers was made and implemented from there.
21

22 415. Throughout the class period, TMS, in concert with its California
23 advertising agencies, failed to disclose the existence of the sudden acceleration
24 defect. Toyota is the exclusive client of Saatchi & Saatchi LA, also located in
25
26

27 ⁷⁸ Available at http://www.nytimes.com/2010/03/16/opinion/16herbert.html?_r=1,
28 date last visited August 1, 2010.

1 Torrance, California. The only client work displayed on its website is for Toyota,
2 and it has received many awards over the years for various Toyota campaigns.⁷⁹

3
4 416. Personnel at Saatchi & Saatchi LA have direct ties to Toyota, including
5 CEO Kurt Ritter, who is a member of the Toyota Worldwide Executive Board, and
6 Chief Strategy Officer Mark Turner, who also “sits on Toyota’s Worldwide
7 Executive Board, as the strategic lead for all Toyota business managed by the
8 Saatchi network throughout the world.” President Chuck Maguy is described as a
9 longtime veteran of the Toyota account who returned to Saatchi LA in early 2009
10 after serving as Executive Director at Saatchi & Saatchi LA’s sister agency, Team
11 One, where he managed the Lexus brand.
12
13

14 417. Team One is also located in California with its headquarters in El
15 Segundo (about 12 miles from Torrance, California), and its CEO, Kurt Ritter, who
16 is a member of the Toyota Worldwide Executive Board, is also CEO for Saatchi &
17 Saatchi LA.⁸⁰
18
19

20 418. Marketing campaigns falsely promoting Toyotas as safe and reliable
21 were conceived and designed in California.
22

23 419. Toyota personnel responsible for managing Toyota’s customer service
24 division are located at the TMS’ California headquarters. The “Customer
25 Experience Center” directs customers to call 1-800-331-4331, which is a landline in
26

27 ⁷⁹ <http://www.saatchila.com/>.

28 ⁸⁰ <http://www.teamone-usa.com/>.

1 Torrance, California, and to fax to 310-468-7814, which includes the area code for
2 Torrance, California.⁸¹ Customers are directed to send correspondence to Toyota
3 Motor Sales, U.S.A., Inc., 19001 South Western Ave., Dept. WC11, Torrance, CA
4 90501. In addition, personnel from Toyota Motor Sales in Torrance, California, also
5 communicate via e-mail with customers concerned about sudden acceleration.
6

7
8 420. These California personnel implemented Toyota's decision to deny the
9 existence of the SUA and brake-override defects when customers called to complain
10 and instead blame floor mats and sticking accelerator pedals or driver error. For
11 example, a series of e-mail exchanges with a customer concerned about incidents of
12 sudden acceleration with his Prius show that the California personnel indicated that
13 upon inspection Toyota found his vehicle "to be operating as designed" and
14 "recommend[ed] removing the driver's side floor mat." The California personnel
15 also indicated that "Toyota has commissioned Exponent, one of the country's
16 leading engineering and scientific consulting firms, to conduct a comprehensive
17 analysis of the electronic throttle control systems in Toyota and Lexus vehicles."
18
19
20

21 421. According to the LOS ANGELES TIMES, a 56-page report that Menlo
22 Park, California-based Exponent sent to Congress on February 9, 2010, found that
23 the system behaved as intended and that Exponent was "unable to induce ...
24
25
26
27

28 ⁸¹ <http://www.toyota.com/help/contactus.html>.

1 unintended acceleration or behavior that might be a precursor to such an event.”⁸²

2 Presumably, the tests performed by Exponent took place in California because
3
4 Southern Illinois University’s David Gilbert had to fly to California to see a
5 demonstration at Exponent after he testified before the House Energy and Commerce
6 Committee regarding his ability to demonstrate electronic failure modes in a Toyota
7 Avalon to recreate the acceleration without triggering any trouble codes in the
8 vehicle’s computer.
9

10 422. Toyota personnel responsible for communicating with dealers regarding
11 known problems with Defective Vehicles are also located at TMS’ California
12 headquarters, and the decision not to inform Toyota dealers of the SUA defect was
13 made and implemented from there.
14
15

16 423. Toyota personnel responsible for managing the distribution of
17 replacement floor mats and accelerator pedal parts to Toyota dealerships are located
18 at TMS’ California headquarters. The decision to supply replacement parts
19 inadequate to address the SUA defect was made and implemented from Toyota’s
20 California headquarters.
21

22 424. In addition, some of the most renowned cases of sudden acceleration
23 occurred in California. For example, in August 2009, California Highway Patrol
24 Officer Mark Saylor and his family were killed after the Lexus ES 350 they were
25

26 ⁸² *Toyota Calls in Exponent, Inc. As Hired Gun*, LA TIMES (Feb. 18, 2010),
27 available at [http://articles.latimes.com/2010/feb/18/business/la-fi-toyota-exponent18-](http://articles.latimes.com/2010/feb/18/business/la-fi-toyota-exponent18-2010feb18)
28 2010feb18, date last visited August 1, 2010.

1 driving went out of control during an episode of unintended acceleration. The
2 vehicle crashed into an SUV, ran through a fence, rolled over and burst into flames
3 in San Diego, California.
4

5 425. Toyota's presence is more substantial in California than any other state.
6 Since 1991, it has manufactured 2,454,336 Tacomas and since 1986, 3,000,935
7 Corollas in California. It has four "Financial Service Offices" in California, a "Hiro"
8 operation or manufacturing facility, a research and development center, and a design
9 center in California. It has more employees in California than any other state, with
10 10,725 "direct employees" and 21,485 "indirect employees."
11

12 426. Lexus is also headquartered in Torrance, California. Advertisements for
13 Lexus, and decisions on how to respond to customer complaints on SUA, were made
14 in California.
15

16 427. On information and belief, during the class period hundreds of
17 thousands or millions of Defective Vehicles manufactured in Japan have entered the
18 United States at ports in California.
19

20 **V. CLASS ALLEGATIONS**

21 **A. State Law Classes**

22 428. Plaintiffs allege a separate class for each State and the District of
23 Columbia based upon the applicable laws set forth in the alternate state law counts.
24 Each class is defined as follows for the claims asserted under a particular
25 jurisdiction's law:
26
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Alabama a
3 Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Alaska a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Arizona a
12 Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Arkansas a
17 Toyota vehicle with ETCS.
18

19
20 During the fullest period allowed by law, all persons or
21 entities, who purchased or leased in the state of California a
22 Toyota vehicle with ETCS.
23

24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of Colorado a
26 Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of
3 Connecticut a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Delaware a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the District of
12 Columbia a Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Florida a
17 Toyota vehicle with ETCS (further defined below).
18

19 During the fullest period allowed by law, all persons or
20 entities, who purchased or leased in the state of Georgia a
21 Toyota vehicle with ETCS.
22

23
24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of Hawaii a
26 Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Idaho a
3 Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Illinois a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Indiana a
12 Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Iowa a
17 Toyota vehicle with ETCS.
18

19
20 During the fullest period allowed by law, all persons or
21 entities, who purchased or leased in the state of Kansas a
22 Toyota vehicle with ETCS.
23

24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of Kentucky a
26 Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Louisiana a
3 Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Maine a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Maryland a
12 Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of
17 Massachusetts a Toyota vehicle with ETCS.
18

19 During the fullest period allowed by law, all persons or
20 entities, who purchased or leased in the state of Michigan a
21 Toyota vehicle with ETCS.
22

23
24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of Minnesota
26 a Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Mississippi
3 a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Missouri a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Montana a
12 Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Nebraska a
17 Toyota vehicle with ETCS.
18

19 During the fullest period allowed by law, all persons or
20 entities, who purchased or leased in the state of Nevada a
21 Toyota vehicle with ETCS.
22

23
24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of New
26 Hampshire a Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of New Jersey
3 a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of New
7 Mexico a Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of New York
12 a Toyota vehicle with ETCS (further defined below).
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of North
17 Carolina a Toyota vehicle with ETCS.
18

19
20 During the fullest period allowed by law, all persons or
21 entities, who purchased or leased in the state of North
22 Dakota a Toyota vehicle with ETCS.
23

24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of Ohio a
26 Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Oklahoma
3 a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Oregon a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of
12 Pennsylvania a Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Rhode
17 Island a Toyota vehicle with ETCS.
18

19
20 During the fullest period allowed by law, all persons or
21 entities, who purchased or leased in the state of South
22 Carolina a Toyota vehicle with ETCS.
23

24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of South
26 Dakota a Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of Tennessee
3 a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Texas a
7 Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Utah a
12 Toyota vehicle with ETCS.
13

14
15 During the fullest period allowed by law, all persons or
16 entities, who purchased or leased in the state of Vermont a
17 Toyota vehicle with ETCS.
18

19
20 During the fullest period allowed by law, all persons or
21 entities, who purchased or leased in the state of Virginia a
22 Toyota vehicle with ETCS.
23

24 During the fullest period allowed by law, all persons or
25 entities, who purchased or leased in the state of
26 Washington a Toyota vehicle with ETCS.
27
28

1 During the fullest period allowed by law, all persons or
2 entities, who purchased or leased in the state of West
3 Virginia a Toyota vehicle with ETCS.
4

5 During the fullest period allowed by law, all persons or
6 entities, who purchased or leased in the state of Wisconsin
7 a Toyota vehicle with ETCS.
8

9
10 During the fullest period allowed by law, all persons or
11 entities, who purchased or leased in the state of Wyoming a
12 Toyota vehicle with ETCS.
13

14 429. Excluded from each Class (and from the Bellwether Classes and
15 Subclasses identified below) are Defendants, their employees, co-conspirators,
16 officers, directors, legal representatives, heirs, successors and wholly or partly
17 owned subsidiaries or affiliated companies; class counsel and their employees; and
18 the judicial officers and their immediate family members and associated court staff
19 assigned to this case, and all persons within the third degree of relationship to any
20 such persons. Also excluded are any individuals claiming damages from personal
21 injuries arising from a SUA incident.
22

23 430. **Bellwether Classes and Subclasses.** For purposes of the Economic
24 Loss Bellwether trials, the Economic Loss Consumer Plaintiffs allege that applicable
25 class includes
26
27
28

1 All persons or entities who both resided in, and purchased or leased in,
2 the state of California a Toyota vehicle manufactured, designed or sold
3 with ETCS.

4 Plaintiffs also identify the following Bellwether Consumer Subclasses (the
5 applicable legal claim for each Subclass is violation of the California Unfair
6 Competition Law , Cal. Bus. & Prof. Code § 17200, et seq.):

8 **1. The Sticky Pedal TREAD Act Subclass**

9 All persons or entities who, from January 17, 2008 to January 27, 2010,
10 resided in and purchased or leased in the state of California the following models and
11 model years: 2007-10MY Tundra; 2008-10MY Sequoia; 2005-10MY Avalon; 2007-
12 10MY Camry; 2009MY Camry HV; 2009-10MY Corolla; 2009-10MY Matrix;
13 2009-10MY RAV4; and 2010MY Highlander.

15 **2. The Pedal Entrapment TREAD Act Subclass**

16 All persons or entities who, from December 15, 2005 to October 5, 2009,
17 resided in and purchased or leased in the state of California, the following models
18 and model years: 2007-11MY Camry; 2005-10MY Avalon; 2004-09MY Prius;
19 2005-10MY Tacoma; 2007-10MY Tundra; 2007-10MY Lexus ES350; 2006-10MY
20 Lexus IS250/350; 2008-10MY Highlander; 2009-10MY Corolla; 2009-10MY
21 Venza; and 2009-10MY Corolla Matrix.

23 **3. The Proposed Bellwether Florida Consumer Class**

24 All persons or entities who both resided in, and purchased
25 or leased in, the State of Florida a Toyota vehicle
26 manufactured, designed or sold with ETCS and who
27 experienced a UA event.
28

1 The Economic Loss Plaintiffs also identify the following proposed Bellwether
2 Florida Consumer Subclasses (the applicable legal claim for each Subclass is
3 violation of the Florida Deceptive and Unfair Trade Practices Act, FLA. STAT.
4 § 501.201, *et seq.*):
5

6 **a. The Sticky Pedal TREAD Act Subclass**

7 All persons or entities who, from January 17, 2008 to
8 January 27, 2010, resided in and purchased or leased in the
9 State of Florida the following models and model years and
10 who experienced a UA: 2007-10MY Tundra; 2008-10MY
11 Sequoia; 2005-10MY Avalon; 2007-10MY Camry;
12 2009MY Camry HV; 2009-10MY Corolla; 2009-10MY
13 Matrix; 2009-10MY RAV4; and 2010MY Highlander.
14

15 **b. The Pedal Entrapment TREAD Act Subclass**

16 All persons or entities who, from December 15, 2005 to
17 October 5, 2009, resided in and purchased or leased in the
18 State of Florida the following models and model years:
19 2007-11MY Camry; 2005-10MY Avalon; 2004-09MY
20 Prius; 2005-10MY Tacoma; 2007-10MY Tundra; 2007-
21 10MY Lexus ES350; 2006-10MY Lexus IS250/350; 2008-
22 10MY Highlander; 2009-10MY Corolla; 2009-10MY
23 Venza; and 2009-10MY Corolla Matrix.
24

25 **4. The Proposed Bellwether New York Consumer Class**

26 All persons or entities who both resided in, and purchased
27 or leased in, the State of New York a Toyota vehicle
28

1 manufactured, designed or sold with ETCS and who sold
2 their vehicle after September 2009 or who experienced a
3 UA.

4 431. Pursuant to Rule 23(a)(1), each state Class is so numerous that joinder
5 of all members is impracticable. Due to the nature of the trade and commerce
6 involved, the members of the Consumer Classes are geographically dispersed
7 throughout each state and joinder of all Consumer Class members would be
8 impracticable. While the exact number of Consumer Class members is unknown to
9 Plaintiffs at this time, Plaintiffs believe that there are, at least, tens of thousands of
10 members in each state Class.
11

12 432. Pursuant to Rule 23(a)(3), Plaintiffs' claims are typical of the claims of
13 the other members of the state Consumer Classes. Plaintiffs and other class
14 members received the same standardized misrepresentations, warranties, and non-
15 disclosures about the safety and quality of Defective Vehicles. Toyota's
16 misrepresentations were made pursuant to a standardized policy and procedure
17 implemented by Toyota. Plaintiffs and class members purchased or leased Toyotas
18 that they would not have purchased or leased at all, or for as much as they paid, had
19 they known the truth regarding a SUA defect. Plaintiffs and the members of the
20 Nationwide Class have all sustained injury in that they overpaid for Toyotas due to
21 Defendants' wrongful conduct.
22

23 433. Pursuant to Rule 23(a)(4) and (g)(1), Plaintiffs will fairly and
24 adequately protect the interests of the members of the Consumer Classes and have
25 retained counsel competent and experienced in class action and consumer fraud
26 litigation.
27
28

1 434. Pursuant to Rules 23(b)(2), Toyota has acted or refused to act on
2 grounds generally applicable to the Nationwide Consumer Class, thereby making
3 appropriate final injunctive relief or corresponding declaratory relief with respect to
4 the class as a whole. In particular, Toyota has failed to properly repair Subject
5 Vehicles, and has failed to adequately implement a brake-override repair, and has
6 failed to manufacture and sell vehicles with software that will execute on a consistent
7 and reliable basis and said software has been manufactured in violation of applicable
8 industry safety and coding standards.
9

10 435. Pursuant to Rule 23(a)(2) and (b)(3), common questions of law and fact
11 exist as to all members of the Consumer Classes and predominate over any questions
12 solely affecting individual members thereof. Among the common questions of law
13 and fact are as follows:
14

15 a. Whether Toyota had knowledge of the defects prior to its
16 issuance of the current safety recalls;

17 b. Whether Toyota concealed defects affecting Defective Vehicles;

18 c. Whether Toyota misrepresented the safety of the automotive
19 vehicles at issue;
20

21 d. Whether Toyota sold each vehicle with defective software and
22 software that was not developed pursuant to industry standards;

23 e. Whether Toyota's quality control was so inadequate that it failed
24 to analyze and understand its UA problem and could not represent that its vehicles
25 were of high quality, reliability and safety;
26
27
28

1 f. Whether Toyota's misrepresentations and omissions regarding
2 the safety and quality of its vehicles were likely to deceive a reasonable person in
3 violation of the CLRA;

4 g. whether a reasonable consumer would pay less for a car that had
5 an increased chance of UA;

6 h. whether a reasonable consumer would pay less for a car that was
7 not manufactured in accord with Toyota's promise of Quality, Dependability and
8 Reliability;

9 h. Whether Toyota violated the unlawful prong of the UCL by its
10 violation of the CLRA;

11 i. Whether Toyota violated the unlawful prong of the UCL by its
12 violation of federal laws;

13 j. Whether Toyota's misrepresentations and omissions regarding
14 the safety of its vehicles were likely to deceive a reasonable person in violation of
15 the fraudulent prong of the UCL;

16 k. Whether Toyota's business practices, including the manufacture
17 and sale of vehicles with an unintended acceleration defect that Defendants have
18 failed to adequately investigate, disclose and remedy, offend established public
19 policy and cause harm to consumers that greatly outweighs any benefits associated
20 with those practices;

21 l. Whether Toyota's misrepresentations and omissions regarding
22 the safety of its vehicles were likely to deceive a reasonable person in violation of
23 the FAL;

1 l. Whether Toyota breached its express warranties regarding the
2 safety and quality of its vehicles;

3 m. Whether Toyota breached the implied warranty of
4 merchantability because its vehicles were not fit for their ordinary purpose due to
5 their sudden acceleration defect;

6 n. Whether Plaintiffs and class members are entitled to damages,
7 restitution, restitutionary disgorgement, equitable relief, and/or other relief; and
8

9 o. The amount and nature of such relief to be awarded to Plaintiffs
10 and the Nationwide Consumer Class.

11 436. Pursuant to Rules 23(b)(3), a class action is superior to other available
12 methods for the fair and efficient adjudication of this controversy because joinder of
13 all class members is impracticable. The prosecution of separate actions by individual
14 members of the Consumer Classes would impose heavy burdens upon the courts and
15 Defendants, and would create a risk of inconsistent or varying adjudications of the
16 questions of law and fact common to those classes. A class action would achieve
17 substantial economies of time, effort and expense, and would assure uniformity of
18 decision as to persons similarly situated without sacrificing procedural fairness.
19
20

21 **B. Non-Consumer Economic Loss Class**

22 437. Pursuant to Rules 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil
23 Procedure, the Commercial Plaintiffs bring this action on behalf of themselves and a
24 Commercial Class initially defined as follows:

25 All individuals or entities in any of the fifty states who
26 purchased, leased and/or insured the residual value of a
27 Toyota vehicle with ETCS and were engaged in the
28

business of vehicle sales, rentals, or providing residual
value insurance for those vehicles.

Excluded from the Commercial Classes (and from the Bellwether Classes and Subclasses identified below) are Defendants, their employees, co-conspirators, officers, directors, legal representatives, heirs, successors and wholly or partly owned subsidiaries or affiliated companies; class counsel and their employees; and the judicial officers and their immediate family members and associated court staff assigned to this case, and all persons within the third degree of relationship to any such persons.

1. The Bellwether Commercial Economic Loss Class

For purposes of the Bellwether trial for the claims of the Commercial Economic Loss Plaintiffs, Plaintiffs identify the following Bellwether Commercial Economic Loss Class:

All individuals or entities that both resided in, and
purchased or leased in, the State of California a Toyota
vehicle with ETCS and were engaged in the business of
vehicle sales or rentals for those vehicles.⁸³

The Economic Loss Plaintiffs also identify the following Bellwether Commercial Economic Loss Subclasses (the applicable legal claim for each Subclass is violation of the California Unfair Competition Law , CAL. BUS. & PROF. CODE § 17200, *et seq.*):

⁸³ The Toyota vehicles at issue are identified in Appendix A hereto.

a. The Sticky Pedal TREAD Act Subclass

All members of the Commercial Class who sold or rented, from January 17, 2008 to January 27, 2010, in the State of California the following models and model years: 2007-10MY Tundra; 2008-10MY Sequoia; 2005-10MY Avalon; 2007-10MY Camry; 2009MY Camry HV; 2009-10MY Corolla; 2009-10MY Matrix; 2009-10MY RAV4; and 2010MY Highlander.

b. The Pedal Entrapment TREAD Act Subclass

All members of the Commercial Class who sold or rented from December 15, 2005 to October 5, 2009, in the State of California the following models and model years: 2007-11MY Camry; 2005-10MY Avalon; 2004-09MY Prius; 2005-10MY Tacoma; 2007-10MY Tundra; 2007-10MY Lexus ES350; 2006-10MY Lexus IS250/350; 2008-10MY Highlander; 2009-10MY Corolla; 2009-10MY Venza; and 2009-10MY Corolla Matrix.

438. Pursuant to Rule 23(a)(1), the Commercial Classes are so numerous that joinder of all members is impracticable. Due to the nature of the trade and commerce involved, the members of the Commercial Classes are geographically dispersed each state, and joinder of all Commercial Class members would be impracticable. While the exact number of Commercial Class members is unknown to Plaintiffs at this time, Plaintiffs believe that there are hundreds of members of the Commercial Class.

1 439. Pursuant to Rule 23(a)(3), Commercial Plaintiffs' claims are typical of
2 the claims of the other members of the Commercial Classes. Commercial Plaintiffs
3 and other class members received the same standardized misrepresentations,
4 warranties, and nondisclosures about the safety and quality of Defective Vehicles.
5 Toyota's misrepresentations were made pursuant to a standardized policy and
6 procedure implemented by Toyota. Commercial Plaintiffs and class members
7 purchased or leased Toyotas for commercial purposes, and they would not have
8 purchased or leased the vehicles, or paid as much as they paid, had they known the
9 truth regarding a SUA defect. Commercial Plaintiffs and the members of the
10 Commercial Classes have all sustained injury in that they overpaid for Toyotas due
11 to Defendants' wrongful conduct and experienced damages from the inability to use
12 the vehicles for the commercial purposes for which they were purchased or leased.
13

14 440. Pursuant to Rule 23(a)(4) and (g)(1), Commercial Plaintiffs will fairly
15 and adequately protect the interests of the members of the Commercial Class and
16 have retained counsel competent and experienced in class action and consumer fraud
17 litigation.
18

19 441. Pursuant to Rule 23(b)(2), Toyota has acted or refused to act on grounds
20 generally applicable to the Commercial Classes, thereby making appropriate final
21 injunctive relief or corresponding declaratory relief with respect to those classes as a
22 whole.
23

24 442. Pursuant to Rule 23(a)(2) and (b)(3), common questions of law and fact
25 exist as to all members of the Commercial Classes and predominate over any
26 questions solely affecting individual members thereof. Among the common
27 questions of law and fact are as follows:
28

1 a. Whether Toyota had knowledge of the design defects prior to its
2 issuance of the current safety recalls;

3 b. Whether Toyota concealed design defects affecting Defective
4 Vehicles;

5 c. Whether Toyota misrepresented the safety of the automotive
6 vehicles at issue;

7 d. Whether Toyota sold each vehicle with defective software and
8 software that was not developed pursuant to industry standards;

9 e. Whether Toyota's quality control was so inadequate that it failed
10 to analyze and understand its UA problem;

11 f. Whether Toyota violated the unlawful prong of the UCL by its
12 violation of the CLRA;

13 g. Whether Toyota violated the unlawful prong of the UCL by its
14 violation of federal laws;

15 h. Whether Toyota's misrepresentations and omissions regarding
16 the safety of its vehicles were likely to deceive a reasonable person in violation of
17 the fraudulent prong of the UCL;

18 i. Whether Toyota's business practices, including the manufacture
19 and sale of vehicles with a SUA defect that Defendants have failed to adequately
20 investigate, disclose and remedy, offend established public policy and cause harm to
21 consumers that greatly outweighs any benefits associated with those practices;

1 j. Whether Toyota's misrepresentations and omissions regarding
2 the safety of its vehicles were likely to deceive a reasonable person in violation of
3 the FAL;
4

5 k. Whether Toyota breached its express warranties regarding the
6 safety and quality of its vehicles;
7

8 l. Whether Toyota breached the implied warranty of
9 merchantability because its vehicles were not fit for their ordinary purpose due to
10 their sudden acceleration defect;
11

12 m. Whether Commercial Plaintiffs and class members are entitled to
13 damages, restitution, restitutionary disgorgement, equitable relief, and/or other relief;
14

15 n. The amount and nature of such relief to be awarded to
16 Commercial Plaintiffs and the Nationwide Commercial Class; and

17 o. Whether Defendants committed fraud by intentionally concealing
18 omitted facts.
19

20 443. Pursuant to Rule 23(b)(3), a class action is superior to other available
21 methods for the fair and efficient adjudication of this controversy because joinder of
22 all Commercial Classes members is impracticable. The prosecution of separate
23 actions by individual members of the Commercial Class would impose heavy
24 burdens upon the courts and Defendants, and would create a risk of inconsistent or
25 varying adjudications of the questions of law and fact common to those classes. A
26 class action would achieve substantial economies of time, effort and expense, and
27
28

1 would assure uniformity of decision as to persons similarly situated without
2 sacrificing procedural fairness.

3 **COUNT I**

4 **VIOLATIONS OF THE CONSUMER LEGAL REMEDIES ACT**
5 **(CAL. CIV. CODE § 1750, *et seq.*)**

6 444. The California Consumer Plaintiffs incorporate the allegations set forth
7 above as if fully set forth herein.

8 445. TMC and TMS are “persons” under CAL. CIV. CODE § 1761(c).

9 446. Consumer Plaintiffs are “consumers,” as defined by CAL. CIV. CODE
10 § 1761(d), who purchased or leased one or more Toyota Vehicles.

11 447. Consumer Plaintiffs have previously filed an affidavit that shows venue
12 in this District is proper, to the extent such an affidavit is required by CAL. CIV.
13 CODE § 1780(d).

14 448. TMC and TMS both participated in unfair or deceptive acts or practices
15 that violated the Consumer Legal Remedies Act (“CLRA”), CAL. CIV. CODE § 1750,
16 *et seq.*, as described above and below. TMC and TMS each are directly liable for
17 these violations of law. TMC also is liable for TMS’s violations of the CLRA
18 because TMS acts as TMC’s general agent in the United States for purposes of sales
19 and marketing.

20 449. By failing to disclose and actively concealing the SUA defect and the
21 lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS,
22 by misrepresenting its vehicles as “safe,” “reliable,” “dependable,” and of high
23 quality and by selling vehicles while violating the TREAD Act, TMC and TMS
24 engaged in deceptive business practices prohibited by the CLRA, CAL. CIV. CODE
25
26
27
28

1 § 1750, *et seq.*, including (1) representing that Toyota Vehicles have characteristics,
2 uses, benefits, and qualities which they do not have, (2) representing that Toyota
3 Vehicles are of a particular standard, quality, and grade when they are not,
4 (3) advertising Toyota Vehicles with the intent not to sell them as advertised,
5 (4) representing that a transaction involving Toyota Vehicles confers or involves
6 rights, remedies, and obligations which it does not, (5) representing that the subject
7 of a transaction involving Toyota Vehicles has been supplied in accordance with a
8 previous representation when it has not; and (6) selling vehicles in violation of the
9 TREAD Act.
10

11 450. As alleged above, TMC and TMS made numerous material statements
12 about the quality, safety and reliability of Toyota Vehicles that were either false or
13 misleading. Each of these statements contributed to the deceptive context of TMC's
14 and TMS's unlawful advertising and representations as a whole.
15

16 451. TMC and TMS knew that the ETCS in the Toyota Vehicles had a SUA
17 defect could fail without warning, and were not suitable for its intended use of
18 regulating throttle position and vehicle speed based on driver commands. TMC and
19 TMS also knew that mats and sticky pedals could cause SUA. TMC and TMS
20 nevertheless failed to warn Consumer Plaintiffs about these inherent dangers despite
21 having a duty to do so.
22

23 452. A reasonable consumer would not have paid as much as he or she did
24 for a Toyota vehicle if Toyota had disclosed (i) that its vehicles suffered from a
25 statistically significant increase in UA upon introduction of ETCS, (ii) Toyota was
26 unaware of and not adequately investigating the cause of UA in its vehicles,
27 (iii) Toyota's software did not comply with safety-related coding standards and
28

1 contained “major bugs” which are unacceptable in a safety critical environment, and
2 (iv) that Toyota’s software was such that UA events could occur that went
3 undetected by Toyota’s fail-safe systems.

4 453. TMC and TMS each owed Consumer Plaintiffs a duty to disclose the
5 defective nature of Toyota Vehicles, including the SUA defect and the dangerous
6 risk of throttle control failure, the ETCS defects, and the lack of adequate fail-safe
7 mechanisms, and facts relating to the quality of the vehicles being manufactured
8 because they:

9
10 a. Possessed exclusive knowledge of the defects rendering
11 Defective Vehicles inherently more dangerous and unreliable than similar vehicles;

12
13 b. Intentionally concealed the hazardous situation with Toyota
14 Vehicles through their deceptive marketing campaign and recall program that they
15 designed to hide the life-threatening problems from Consumer Plaintiffs and all of
16 the potential causes of SUA; and/or

17
18 c. Made incomplete representations about the quality, safety and
19 reliability of Toyota Vehicles generally, and ETCS in particular, while purposefully
20 withholding material facts from Consumer Plaintiffs that contradicted these
21 representations.

22 454. Toyota Vehicles equipped with ETCS and/or poor pedal geometrical
23 floor well design pose an unreasonable risk of death or serious bodily injury to
24 Consumer Plaintiffs, passengers, other motorists, pedestrians, and the public at large,
25 because they are susceptible to incidents of SUA.

26
27 455. Whether or not a vehicle (a) accelerates only when commanded to do so
28 and (b) decelerates and stops when commanded to do so are facts that a reasonable

1 consumer would consider important in selecting a vehicle to purchase or lease.
2 When Consumer Plaintiffs bought a Toyota Vehicle for personal, family, or
3 household purposes, they reasonably expected the vehicle would (a) not accelerate
4 unless commanded to do so by application of the accelerator pedal or other driver-
5 controlled means; (b) decelerate to a stop when the brake pedal was applied, and was
6 equipped with any necessary fail-safe mechanisms including a brake-override.
7

8 456. Each of the plaintiffs who still own their vehicles face an increased risk
9 of future harm that would not be present if defendants had not designed,
10 manufactured and sold vehicles that had an unacceptable increased propensity for
11 SUA and which lack an adequate override/fail-safe mechanism.
12

13 457. TMC's and TMS's unfair or deceptive acts or practices were likely to
14 and did in fact deceive reasonable consumers, including Consumer Plaintiffs, about
15 the true safety and reliability of Defective Vehicles.
16

17 458. As a result of its violations of the CLRA detailed above, TMC and TMS
18 caused actual damage to Consumer Plaintiffs and, if not stopped, will continue to
19 harm Consumer Plaintiffs. Consumer Plaintiffs currently own or lease, or within the
20 class period have owned or leased, Defective Vehicles that are defective and
21 inherently unsafe. ETCS defects, pedal, quality control and floor mat defects and the
22 resulting unintended acceleration incidents have caused the value of Toyota Vehicles
23 to plummet.
24

25 459. Consumer Plaintiffs risk irreparable injury as a result of TMC's and
26 TMS's acts and omissions in violation of the CLRA, and these violations present a
27 continuing risk to Consumer Plaintiffs as well as to the general public.
28

1 460. As early as November 24, 2009, notice was sent to TMS in compliance
2 with CAL. CIV. CODE § 1782. On information and belief, numerous other notices
3 have been sent, including, on or about June 4, 2010, Consumer Plaintiffs sent a
4 notice and demand letter via certified mail to TMS's principal place of business in
5 California, thereby satisfying CAL. CIV. CODE § 1782(a). On or about July 12, 2010,
6 a notice and demand letter was set via certified mail to TMC's headquarters in Japan,
7 where TMC acted with its California subsidiary, TMS, to take actions violating the
8 CLRA, and where TMC otherwise acted in violation of that statute, thereby
9 satisfying CAL. CIV. CODE § 1782(a). Over thirty days have since passed without
10 TMS or TMC taking, or agreeing to take, the appropriate corrective measures.
11

12 461. Pursuant to CAL. CIV. CODE § 1780(a), Consumer Plaintiffs seek
13 monetary relief against TMS and TMC measured as the greater of (a) actual damages
14 in an amount to be determined at trial and (b) statutory damages in the amount of
15 \$1,000 for each Consumer Plaintiff and each member of the class they seek to
16 represent.
17

18 462. Pursuant to CAL. CIV. CODE § 1780(b), Consumer Plaintiffs seek an
19 additional award against TMS and TMC of up to \$5,000 for each Consumer Plaintiff
20 and class member who qualifies as a "senior citizen" or "disabled person" under the
21 CLRA. TMS knew or should have known that its conduct was directed to one or
22 more of the Consumer Plaintiffs who are senior citizens or disabled persons. TMS's
23 conduct caused one or more of these senior citizens or disabled persons to suffer a
24 substantial loss of property set aside for retirement or for personal or family care and
25 maintenance, or assets essential to the health or welfare of the senior citizen or
26 disabled person. One or more of the Consumer Plaintiffs who are senior citizens or
27
28

1 disabled persons are substantially more vulnerable to Defendants' conduct because
2 of age, poor health or infirmity, impaired understanding, restricted mobility, or
3 disability, and each of them actually suffered substantial physical, emotional, or
4 economic damage resulting from Defendants' conduct.

5
6 463. Consumer Plaintiffs also seek punitive damages against Defendants
7 because each carried out despicable conduct with willful and conscious disregard of
8 the rights and safety of others, subjecting Consumer Plaintiffs to cruel and unjust
9 hardship as a result. Defendants intentionally and willfully misrepresented the safety
10 and reliability of Toyota Vehicles, deceived Consumer Plaintiffs on life-or-death
11 matters, and concealed material facts that only it knew, all to avoid the expense and
12 public relations nightmare of correcting a deadly flaw in the Toyota Vehicles it
13 repeatedly promised Consumer Plaintiffs were safe. Defendants' unlawful conduct
14 constitutes malice, oppression, and fraud warranting punitive damages.
15

16 464. The recalls and repairs instituted by Toyota have not been adequate.
17 Toyota Vehicles still are defective and the "confidence" booster offer of an override
18 is not an effective remedy and is not offered to all Toyota Vehicles, including the
19 2002-2007 Camry. UA events continue to occur in Toyota vehicles and Toyota
20 refuses to fix these vehicles, instead blaming each on driver error. In 2010, over
21 14,000 UA events were reported to Toyota and Toyota concluded that all but 167
22 were due to driver error.
23

24 465. Repairs have also been incomplete. SUA incidents continue to occur
25 after cars have been "repaired." For example, Toyota documented an incident with a
26 2007 Avalon that "unintentionally accelerated with high rotation (7000 rpm) and
27
28

1 smoke out from brake. There was an eyewitness.”⁸⁴ The dealer confirmed the “high
2 rotation and not returning to idle” and replaced the pedal and the throttle. The dealer
3 declined to provide a document saying UA would not recur and refused to buy back
4 the vehicle. Most of the Recalled Vehicles have not had their throttles replaced.

5
6 466. Consumer Plaintiffs further seek an order enjoining Defendants’ unfair
7 or deceptive acts or practices, restitution, punitive damages, costs of Court,
8 attorney’s fees under CAL. CIV. CODE § 1780(e), and any other just and proper relief
9 available under the CLRA.

10
11 **COUNT II**
12 **VIOLATION OF THE CALIFORNIA UNFAIR COMPETITION LAW**
13 **(CAL. BUS. & PROF. CODE § 17200, *et seq.*)**

14 467. Plaintiffs reallege and incorporate by reference all paragraphs alleged
15 herein.

16 468. Plaintiffs assert this claim on behalf of themselves and members of the
17 California Consumer and Commercial Classes on behalf of all persons or entities that
18 purchased or leased a vehicle from Toyota or a Toyota dealership.

19 469. California Business and Professions Code section 17200 prohibits any
20 “unlawful, unfair, or fraudulent business act or practices.” Defendants have engaged
21 in unlawful, fraudulent, and unfair business acts and practices in violation of the
22 UCL.

23 470. Defendants have violated the unlawful prong of section 17200 by their
24 violations of the Consumer Legal Remedies Act, CAL. CIV. CODE § 1750, *et seq.*, as
25 set forth in Count I by the acts and practices set forth in this Complaint.
26

27
28

⁸⁴ TOY-MDLID00041241T000.

1 471. Defendants have also violated the unlawful prong because TMC and
2 TMS have engaged in business acts or practices that are unlawful because they
3 violate the National Traffic and Motor Vehicle Safety Act of 1996 (the “Safety
4 Act”), codified at 49 U.S.C. § 30101, *et seq.*, and its regulations.
5

6 472. FMVSS 124, codified at 49 C.F.R. § 571.124, sets the standard for
7 accelerator control systems. Specifically, FMVSS 124 establishes requirements for
8 the return of a vehicle’s throttle to the idle position when the driver removes the
9 actuating force from the accelerator control, or in the event of a severance or
10 disconnection in the accelerator control system. The purpose of FMVSS 124 is to
11 reduce deaths and injuries resulting from engine overspeed caused by malfunctions
12 in the accelerator control system.
13

14 473. FMVSS 124 requires that throttles in passenger vehicles return to the
15 idle position within certain maximum allowable times after the driver has removed
16 the actuating force from the accelerator control: one second for vehicles of 4,536
17 kilograms or less gross vehicle weight rating (“GVWR”), two seconds for vehicles of
18 more than 4,536 kilograms GVWR, and three seconds for any vehicle that is exposed
19 to ambient air at – 18 degrees Celsius to – 40 degrees Celsius.
20

21 474. Defective Vehicles equipped with ETCS do not comply with
22 FMVSS 124 because a design defect causes their throttles to be susceptible to
23 remaining in an open position and incapable of returning to the idle position within
24 the maximum allowable time after the driver has removed the actuating force from
25 the accelerator control.
26

27 475. TMC and TMS each violated 49 U.S.C. § 3-112(a)(1) by manufacturing
28 for sale, selling, offering for introduction in interstate commerce, or importing into

1 the United States, Defective Vehicles equipped with ETCS that failed to comply with
2 FMVSS 124.

3 476. TMC and TMS each violated 49 U.S.C. § 30115(a) by certifying that
4 Defective Vehicles equipped with ETCS complied with FMVSS 124 when, in the
5 exercise of reasonable care, TMC and TMS each had reason to know that the
6 certification was false or misleading because a design defect causes throttles in
7 Defective Vehicles equipped with ETCS to be susceptible to remaining in an open
8 position and incapable of returning to the idle position within the maximum
9 allowable time after the driver has removed the actuating force from the accelerator
10 control.
11

12 477. TMC and TMS also violated the “TREAD Act,” 49 U.S.C. §§ 30101-
13 30170, when they failed to timely inform NHTSA of the pedal and mat defects and
14 allowed cars to be sold with these defects.
15

16 478. Defendants have violated the fraudulent prong of section 17200 because
17 the misrepresentations and omissions regarding the safety and reliability of their
18 vehicles as set forth in this Complaint were likely to deceive a reasonable consumer,
19 and the information would be material to a reasonable consumer.
20

21 479. Defendants have violated the unfair prong of section 17200 because the
22 acts and practices set forth in the Complaint, including the manufacture and sale of
23 vehicles with a sudden acceleration defect that lack brake-override or other effective
24 fail-safe mechanism, and Defendants’ failure to adequately investigate, disclose and
25 remedy, offend established public policy, and because the harm they cause to
26 consumers greatly outweighs any benefits associated with those practices.
27

28 Defendants’ conduct has also impaired competition within the automotive vehicles

1 market and has prevented Plaintiffs from making fully informed decisions about
2 whether to purchase or lease Defective Vehicles and/or the price to be paid to
3 purchase or lease Defective Vehicles.

4 480. The Named Plaintiffs have suffered an injury in fact, including the loss
5 of money or property, as a result of Defendants' unfair, unlawful and/or deceptive
6 practices. As set forth in the allegations concerning each plaintiff, in purchasing or
7 leasing their vehicles, the Plaintiffs relied on the misrepresentations and/or omissions
8 of Toyota with respect of the quality, safety and reliability of the vehicles. Toyota's
9 representations turned out not to be true because the vehicles can unexpectedly and
10 dangerously accelerate out of the drivers' control. Had the Named Plaintiffs known
11 this they would not have purchased or leased their Defective Vehicles and/or paid as
12 much for them.
13
14

15 481. All of the wrongful conduct alleged herein occurred, and continues to
16 occur, in the conduct of Defendants' business. Defendants' wrongful conduct is part
17 of a pattern or generalized course of conduct that is still perpetuated and repeated,
18 both in the State of California and nationwide.
19

20 482. Plaintiffs request that this Court enter such orders or judgments as may
21 be necessary to enjoin Defendants from continuing their unfair, unlawful, and/or
22 deceptive practices and to restore to Plaintiffs and members of the Class any money
23 Toyota acquired by unfair competition, including restitution and/or restitutionary
24 disgorgement, as provided in CAL. BUS. & PROF. CODE § 17203 and CAL. CIV. CODE
25 § 3345; and for such other relief set forth below.
26
27
28

COUNT III

**VIOLATION OF THE CALIFORNIA FALSE ADVERTISING LAW
(CAL. BUS. & PROF. CODE § 17500, *et seq.*)**

483. Plaintiffs reallege and incorporate by reference all paragraphs alleged herein.

484. Plaintiffs assert this claim on behalf of themselves and members of the California Consumer and Commercial Classes on behalf of any person or entity that purchased or leased a vehicle from Toyota or a Toyota dealership.

485. California Business and Professions Code § 17500 states: “It is unlawful for any ... corporation ... with intent directly or indirectly to dispose of real or personal property ... to induce the public to enter into any obligation relating thereto, to make or disseminate or cause to be made or disseminated ... from this state before the public in any state, in any newspaper or other publication, or any advertising device, ... or in any other manner or means whatever, including over the Internet, any statement ... which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading.”

486. Defendants caused to be made or disseminated through California and the United States, through advertising, marketing and other publications, statements that were untrue or misleading, and which were known, or which by the exercise of reasonable care should have been known to Defendants, to be untrue and misleading to consumers and Plaintiffs.

1 487. Defendants have violated section 17500 because the misrepresentations
2 and omissions regarding the safety and reliability of their vehicles as set forth in this
3 Complaint were material and likely to deceive a reasonable consumer.

4 488. Named Plaintiffs and members of the Classes have suffered an injury in
5 fact, including the loss of money or property, as a result of Defendants' unfair,
6 unlawful and/or deceptive practices. In purchasing or leasing their vehicles, the
7 Named Plaintiffs relied on the misrepresentations and/or omissions of Toyota with
8 respect to the safety and reliability of the vehicles. Toyota's representations turned
9 out not to be true because the vehicles can unexpectedly and dangerously accelerate
10 out of the drivers' control. Had the Named Plaintiffs known this, they would not
11 have purchased or leased their Toyota Vehicles and/or paid as much for them.
12

13 489. Accordingly, the Named Plaintiffs overpaid for their Toyota Vehicles
14 and did not receive the benefit of their bargain. One way to partially measure this
15 overpayment, or lost benefit of the bargain, at the moment of purchase is by the
16 value consumers place on the vehicles now that the truth has been exposed. Both
17 trade-in prices and auction prices for Subject Vehicles have declined as a result of
18 Defendants' misconduct. This decline in value partially measures the overpayment,
19 or lost benefit of the bargain, at the time of the Named Plaintiffs' purchases.
20

21 490. All of the wrongful conduct alleged herein occurred, and continues to
22 occur, in the conduct of Defendants' business. Defendants' wrongful conduct is part
23 of a pattern or generalized course of conduct that is still perpetuated and repeated,
24 both in the State of California and nationwide.
25

26 491. Plaintiffs request that this Court enter such orders or judgments as may
27 be necessary to enjoin Defendants from continuing their unfair, unlawful, and/or
28

1 deceptive practices and to restore to Plaintiffs and members of the Class any money
2 Toyota acquired by unfair competition, including restitution and/or restitutionary
3 disgorgement, and for such other relief set forth below.

4
5 **COUNT IV**
6 **BREACH OF EXPRESS WARRANTY**
7 **(CAL. COM. CODE § 2313)**

8 492. Plaintiffs incorporate by reference and reallege all paragraphs alleged
9 herein.

10 493. This Count is asserted by the California Consumer and Commercial
11 Classes.

12 494. This Count is asserted on behalf of those plaintiffs and class members
13 who sought repairs pursuant to the recalls or who sought repairs for SUA related
14 issues.

15 495. Toyota is and was at all relevant times a merchant with respect to motor
16 vehicles under CAL. COM. CODE § 2104.

17 496. In the course of selling its vehicles, Toyota expressly warranted in
18 writing that the Vehicles were covered by a Basic Warranty that provided for the
19 following:
20

21 *Accelerator pedal failure, except pedal position sensor*
22 *malfunction*

23 36 months or 36,000 miles for the Vehicles and 48 months
24 or 50,000 miles for the Lexus vehicles from the vehicle's
25 date-of-first-use, whichever occurs first.
26
27
28

1 *Other electronic throttle control system failure including*
2 *pedal position sensor malfunction*

3 60 months or 60,000 miles for the Vehicles and 72 months
4 or 70,000 miles for the Lexus vehicles from the vehicle's
5 date-of-first-use, whichever occurs first.

6
7 497. Toyota breached the express warranty to repair and adjust to correct
8 defects in materials and workmanship of any part supplied by Toyota. Toyota has
9 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
10 materials and workmanship defects.

11 498. In addition to this Basic Warranty, Toyota expressly warranted several
12 attributes, characteristics and qualities, including that:

- 13 • The "by-wire" technology used in the Toyota throttles was a safety
14 feature;
- 15 • Toyota designed their cars at the forefront of technology to enhance
16 active safety (driving dynamics);
- 17 • The use of the electronic throttle control system results in even
18 greater reliability and precision than systems based on hydraulic or
19 mechanical linkages;
- 20 • Toyota uses technology to deliver a high level of safety;
- 21 • Toyota employs a revolutionary electronic control systems that
22 boosts active safety;
- 23 • Toyota's ETCS-i helps improve performance;
- 24 • Class-leading passive safety including 5 Star Euro NCAP rating;
- 25 •
- 26 •
- 27 •
- 28 •

- 1 • Toyota's ETCS-i is at the forefront of active safety systems;
- 2 • Toyota promises advanced safety technology;
- 3 • Toyota customers have long counted on the brand for the best in
- 4 performance, quality and durability;
- 5 • To build safe cars, Toyota promises that it gathers information and
- 6 analyzes why accidents occur and what causes injuries, and that
- 7 "Toyota analyzes data from real accidents that take place all over the
- 8 world," which it uses to develop new safety technologies, testing
- 9 them on actual vehicles before offering them to the public in
- 10 Toyota's product line-up. Toyota claims that this "is a perpetual
- 11 cycle through which Toyota seeks to enhance safety technologies
- 12 and reduce accidents continuously"; and
- 13 • When it comes to the well-being of Toyota drivers and their
- 14 passengers, Toyota has raised the standard.

17 499. These warranties are only a sampling of the numerous warranties that
18 Toyota made relating to safety, reliability and operation, which are more fully
19 outlined in Sections IV.A. and I., *supra*. Generally these express warranties promise
20 heightened, superior, and state-of-the-art safety, reliability, performance standards,
21 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
22 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
23 Toyota to be made by salespeople. These affirmations and promises were part of the
24 basis of the bargain between the parties.
25

26 500. These additional warranties were also breached because the Defective
27 Vehicles were not fully operational, safe, or reliable (and remained so even after the
28

1 problems were acknowledged and a recall “fix” was announced), nor did they
2 comply with the warranties expressly made to purchasers or lessees. Toyota did not
3 provide at the time of sale, and has not provided since then, vehicles conforming to
4 these express warranties.

5
6 501. Furthermore, the limited warranty of repair and/or adjustments to
7 defective parts, fails in its essential purpose because the contractual remedy is
8 insufficient to make the Plaintiffs and Plaintiff Class whole and because the
9 Defendants have failed and/or have refused to adequately provide the promised
10 remedies within a reasonable time. Further, the repairs Toyota offers do not fix all
11 causes of SUA or prevent SUA and are not adequate, hence bringing a vehicle in for
12 repair is a futile act.

13
14 502. In addition, no repair is being offered for certain vehicles. The pedal
15 recall excludes many models, as does the brake-override “confidence booster.” So,
16 for example, a consumer who called in with a SUA on a 2007 Corolla was told no
17 repair was available.

18
19 503. Accordingly, recovery by the Plaintiffs is not limited to the limited
20 warranty of repair or adjustments to parts defective in materials or workmanship, and
21 Plaintiffs seek all remedies as allowed by law.

22 504. Also, as alleged in more detail herein, at the time that Defendants
23 warranted and sold the vehicles, they knew that the vehicles did not conform to the
24 warranties and were inherently defective, and Defendants wrongfully and
25 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
26 In particular defendants failed to assemble and manufacture the ETCS-i in such a
27 way as to prevent SUA events. Plaintiff Classes were therefore induced to purchase
28

1 the vehicles under false and/or fraudulent pretenses. The enforcement under these
2 circumstances of any limitations whatsoever precluding the recovery of incidental
3 and/or consequential damages is unenforceable pursuant to CAL. CIV. CODE § 1670.5
4 and/or § 1668.

5
6 505. Moreover, many of the damages flowing from the Defective Vehicles
7 cannot be resolved through the limited remedy of “replacement or adjustments,” as
8 those incidental and consequential damages have already been suffered due to
9 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
10 continued failure to provide such limited remedy within a reasonable time, and any
11 limitation on Consumer Plaintiffs’ and the Nationwide Commercial Plaintiff Class’s
12 remedies would be insufficient to make Consumer Plaintiffs and the Nationwide
13 Commercial Plaintiff Class whole.

14
15 506. For plaintiffs and class members who brought their vehicles in for repair
16 defendants have not repaired their vehicles as the pedal and mat repairs do not
17 address all of the SUA defects. For plaintiffs who have not been offered a pedal or
18 mat repair bringing their vehicle in for repair would be futile as Toyota denies any
19 other defect that causes SUA. For plaintiffs and class members who could have but
20 did not have a floor mat or pedal repair the failure to bring a car in for repair should
21 be excused as Toyota denies any defects other than pedals or mats and would make
22 no repair.

23
24 507. Plaintiffs pursuant to CAL. COM. CODE § 2607(3)(A) sent effective
25 notice to TMS and TMC on June 4, 2010, and July 12, 2010. Another notice was
26 sent on January 5, 2010.

509. As a direct and proximate result of Toyota's breach of express warranties, Plaintiffs and the Classes have been damaged in an amount to be determined at trial.

510. Plaintiffs incorporate by reference and reallege all paragraphs alleged herein.

512. Toyota is and was at all relevant times a merchant with respect to motor vehicles under CAL. COM. CODE § 2104.

514. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against

1 such SUA events, the vehicles were sold with software that was not programmed
2 according to industry standards nor do they have a brake-override; and the ETCS
3 system was not adequately designed, manufactured and tested.

4 515. Toyota was provided notice of these issues by numerous complaints
5 filed against it, including the instant Complaint, and by numerous individual letters
6 and communications sent by Plaintiffs and members of the Class before or within a
7 reasonable amount of time after Toyota issued the recall and the allegations of
8 vehicle defects became public.
9

10 516. Plaintiffs and Class members have had sufficient direct dealings with
11 either the Defendants or their agents (dealerships) to establish privity of contract
12 between Plaintiffs and the Class members. Notwithstanding this, privity is not
13 required in this case because Plaintiffs and Class members are intended third-party
14 beneficiaries of contracts between Toyota and its dealers; specifically, they are the
15 intended beneficiaries of Toyota's implied warranties. The dealers were not
16 intended to be the ultimate consumers of the Defective Vehicles and have no rights
17 under the warranty agreements provided with the Defective Vehicles; the warranty
18 agreements were designed for and intended to benefit the ultimate consumers only.
19 Finally, privity is also not required because Plaintiffs' and Class members' Toyotas
20 are dangerous instrumentalities due to the aforementioned defects and
21 nonconformities.⁸⁵
22
23
24
25
26

27 ⁸⁵ Plaintiffs assert the dangerous instrumentalities exception for appeal purposes
28 only.

1 517. As a direct and proximate result of Toyota's breach of the warranties of
2 merchantability, Plaintiffs and the Classes have been damaged in an amount to be
3 proven at trial.

4
5 **COUNT VI**
6 **VIOLATION OF MAGNUSON-MOSS WARRANTY ACT**
7 **(15 U.S.C. § 2301, *et seq.*)**

8 518. Plaintiffs incorporate by reference and reallege all paragraphs alleged
9 herein. This Count is asserted by the Nationwide Consumer Plaintiffs and by
10 Plaintiffs Carl Nyquist and Susan Gonzalez. In the event California law does not
11 apply nationwide this Count is asserted by each state class.

12 519. This Court has jurisdiction to decide claims brought under 15 U.S.C.
13 § 2301 by virtue of 28 U.S.C. § 1332 (a)-(d).

14 520. Plaintiff is a "consumer" within the meaning of the Magnuson-Moss
15 Warranty Act, 15 U.S.C. § 2301(3).

16 521. Toyota is a "supplier" and "warrantor" within the meaning of the
17 Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(4)-(5).

18 522. The Defective Vehicles are "consumer products" within the meaning of
19 the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(1).

20 523. 15 U.S.C. § 2310(d)(1) provides a cause of action for any consumer
21 who is damaged by the failure of a warrantor to comply with a written or implied
22 warranty.
23

24 524. Toyota's express warranties are written warranties within the meaning
25 of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(6). The Defective Vehicles'
26 implied warranties are covered under 15 U.S.C. § 2301(7).
27
28

1 525. Toyota breached these warranties as described in more detail above, but
2 generally by not repairing or adjusting the Defective Vehicles' materials and
3 workmanship defects; providing Defective Vehicles not in merchantable condition
4 and which present an unreasonable risk of sudden unintended acceleration and not fit
5 for the ordinary purpose for which vehicles are used; providing Vehicles that were
6 not fully operational, safe, or reliable; and not curing defects and nonconformities
7 once they were identified.
8

9 526. Plaintiffs and Class members have had sufficient direct dealings with
10 either the Defendants or their agents (dealerships) to establish privity of contract
11 between Plaintiffs and the Class members. Notwithstanding this, privity is not
12 required in this case because Plaintiffs and Class members are intended third-party
13 beneficiaries of contracts between Toyota and its dealers; specifically, they are the
14 intended beneficiaries of Toyota's implied warranties. The dealers were not
15 intended to be the ultimate consumers of the Vehicles and have no rights under the
16 warranty agreements provided with the Defective Vehicles; the warranty agreements
17 were designed for and intended to benefit the ultimate consumers only. Finally,
18 privity is also not required because Plaintiffs' and Class members' Toyotas are
19 dangerous instrumentalities due to the aforementioned defects and nonconformities.
20
21

22 527. Plaintiffs Susan Gonzalez and Carl Nyquist participated in Toyota's
23 informal dispute resolution mechanism to completion and fully satisfied any
24 obligations under 15 U.S.C. § 2310(a)(3), and also provided Toyota an opportunity
25 to cure, even though no such opportunity is required in these circumstances.
26

27 528. Plaintiffs have engaged in each of Toyota's three steps to customer
28 satisfaction without their concerns being resolved. Plaintiffs Kathleen Atwater, Joel

1 and Lucy Barker, Susan Chambers, John Geddis, Joseph Hauter, Matthew
2 Heidenreich, Thomas and Connie Kamphaus, John and Mary Laidlaw, Robert
3 Navarro, Carl Nyquist, Peggie Perkin, Elizabeth Van Zyl, Frank Visconi, Susan
4 Gonzalez, and Carole Young have contacted their dealerships to discuss their
5 situation with the dealership customer relations manager, without adequate
6 resolution. Plaintiffs Kathleen Atwater, Dale Baldesseri, Susan Chambers, Susan
7 Gonzalez, Robert Navarro, Carl Nyquist, Peggie Perkin, Thomas and Catherine Roe,
8 and Elizabeth Van Zyl have called Toyota's Customer Experience Center for
9 assistance in working with the dealership to find a satisfactory solution, without
10 adequate resolution. And Plaintiffs Susan Gonzalez and Carl Nyquist have
11 submitted claims for free, nonbinding arbitration before the National Center for
12 Dispute Resolution, without adequate resolution.

15 529. Even if this were not the case, requiring an informal dispute settlement
16 procedure, or affording Toyota a reasonable opportunity to cure its breach of written
17 warranties, would be unnecessary and futile. At the time of sale or lease of each
18 Defective Vehicle, Toyota knew, should have known, or was reckless in not knowing
19 of its misrepresentations concerning the Defective Vehicles' inability to perform as
20 warranted, but nonetheless failed to rectify the situation and/or disclose the defective
21 design. Under the circumstances, the remedies available under any informal
22 settlement procedure would be inadequate and any requirement – whether under the
23 Magnuson-Moss Warranty Act or otherwise – that Plaintiff resort to an informal
24 dispute resolution procedure and/or afford Toyota a reasonable opportunity to cure
25 its breach of warranties is excused and thereby deemed satisfied.
26
27
28

1 530. Plaintiffs and the Class would suffer economic hardship if they returned
2 their vehicles but did not receive the return of all payments made by them. Because
3 Toyota is refusing to acknowledge any revocation of acceptance and return
4 immediately any payments made, Plaintiffs and the Class have not re-accepted their
5 Defective Vehicles by retaining them.
6

7 531. The amount in controversy of Plaintiffs' individual claims meets or
8 exceeds the sum of \$25. The amount in controversy of this action exceeds the sum
9 of \$50,000, exclusive of interest and costs, computed on the basis of all claims to be
10 determined in this lawsuit.
11

12 532. Plaintiffs seek to revoke their acceptance of the Defective Vehicles, or,
13 in the alternative, seek all damages, including diminution in value of their vehicles,
14 in an amount to be proven at trial.

15 **COUNT VII**

16 **BREACH OF CONTRACT/Common Law Warranty**

17 533. The California Consumer Plaintiffs incorporate by reference and
18 reallege all paragraphs alleged herein.
19

20 534. To the extent Toyota's repair or adjust commitment is deemed not to be
21 a warranty under California's Commercial Code, Plaintiffs plead in the alternative
22 under common law warranty and contract law. Toyota limited the remedies
23 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
24 defects in materials or workmanship of any part supplied by Toyota and/or warranted
25 the quality or nature of those services to Plaintiffs.
26
27
28

535. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

536. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VIII

FRAUD BY CONCEALMENT (BASED ON CALIFORNIA LAW)

537. Each of the preceding paragraphs is incorporated by reference as though fully set forth herein.

538. This Count is asserted by the California Consumer Class and Commercial Class.

539. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety, quality, dependability and reliability of their vehicles.

540. Defendants had a duty to disclose these safety, quality, dependability and reliability issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, quality, dependability and reliability Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

1 541. In addition, Defendants had a duty to disclose these omitted material
2 facts because they were known and/or accessible only to Defendants who have
3 superior knowledge and access to the facts, and Defendants knew they were not
4 known to or reasonably discoverable by Plaintiffs and the Classes. These omitted
5 facts were material because they directly impact the safety, quality and reliability of
6 the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's
7 command, and whether a vehicle will stop or not upon application of the brake by
8 the driver, are material safety concerns. Whether a vehicle is a quality and reliable
9 product and has been manufactured and designed according to industry standards are
10 material facts for a reasonable consumer. Defendants possessed exclusive
11 knowledge of the defects and quality control issues rendering Toyota Vehicles
12 inherently more dangerous and unreliable than similar vehicles.
13
14

15 542. Defendants actively concealed and/or suppressed these material facts, in
16 whole or in part, with the intent to induce Plaintiffs and the Classes to purchase
17 Toyota Vehicles at a higher price for the vehicles, which did not match the vehicles'
18 true value.
19

20 543. Defendants still have not made full and adequate disclosure and
21 continue to defraud Plaintiffs and the Classes.

22 544. Plaintiffs and the Classes were unaware of these omitted material facts
23 and would not have acted as they did if they had known of the concealed and/or
24 suppressed facts. Plaintiffs' and the Classes' actions were justified. Defendants
25 were in exclusive control of the material facts and such facts were not known to the
26 public or the Classes.
27
28

1 545. As a result of the concealment and/or suppression of the facts, Plaintiffs
2 and the Classes sustained damage. For those Plaintiffs and the Classes who elect to
3 affirm the sale, these damages, pursuant to CAL. CIV. CODE § 3343, include the
4 difference between the actual value of that which Plaintiffs and the Classes paid and
5 the actual value of that which they received, together with additional damages arising
6 from the sales transaction, amounts expended in reliance upon the fraud,
7 compensation for loss of use and enjoyment of the property, and/or lost profits. For
8 those Plaintiffs and the Classes who want to rescind the purchase, then those
9 Plaintiffs and the Classes are entitled to restitution and consequential damages
10 pursuant to CAL. CIV. CODE § 1692.
11

12 546. Defendants' acts were done maliciously, oppressively, deliberately, with
13 intent to defraud, and in reckless disregard of Plaintiffs' and the Classes' rights and
14 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
15 punitive damages in an amount sufficient to deter such conduct in the future, which
16 amount is to be determined according to proof.
17
18

19
20 **ALABAMA**
21 **COUNT I**
22 **VIOLATION OF ALABAMA DECEPTIVE TRADE PRACTICES ACT**
23 **(Ala. Code § 8-19-1, et seq.)**

24 547. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 548. The conduct of Toyota, as set forth herein, constitutes unfair or
27 deceptive acts or practices, including but not limited to, Toyota's manufacture and
28

1 sale of vehicles with a sudden acceleration defect that lack brake-override or other
2 effective fail-safe mechanisms, which Toyota failed to adequately investigate,
3 disclose and remedy, and its misrepresentations and omissions regarding the safety
4 and reliability of its vehicles.

5
6 549. Toyota's actions, as set forth above, occurred in the conduct of trade or
7 commerce.

8 550. Toyota's actions impact the public interest because Plaintiffs were
9 injured in exactly the same way as millions of others purchasing and/or leasing
10 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
11 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
12 Toyota's business.

13
14 551. Plaintiffs and the Class were injured as a result of Defendant's conduct.
15 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
16 their bargain, and their vehicles have suffered a diminution in value.

17 552. Toyota's conduct proximately caused the injuries to Plaintiffs and the
18 Class.

19
20 553. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
21 proven at trial, including attorneys' fees, costs, and treble damages.

22 554. Pursuant to ALA. CODE § 8-19-8, Plaintiffs will serve the Alabama
23 Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.
24
25
26
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COUNT II
BREACH OF EXPRESS WARRANTY
(Ala. Code § 7-2-313)

555. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

556. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

557. In the course of selling its vehicles, Toyota expressly warranted in writing that the vehicles were covered by a Basic Warranty.

558. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the vehicles' materials and workmanship defects.

559. In addition to this Basic Warranty, Toyota expressly warranted several attributes, characteristics and qualities, as set forth above.

560. These warranties are only a sampling of the numerous warranties that Toyota made relating to safety, reliability and operation, which are more fully outlined in Section IV.A., *supra*. Generally these express warranties promise heightened, superior, and state-of-the-art safety, reliability, performance standards, and promote the benefits of ETCS. These warranties were made, *inter alia*, in advertisements, in Toyota's "e brochures," and in uniform statements provided by Toyota to be made by salespeople. These affirmations and promises were part of the basis of the bargain between the parties.

1 561. These additional warranties were also breached because the Defective
2 Vehicles were not fully operational, safe, or reliable (and remained so even after the
3 problems were acknowledged and a recall “fix” was announced), nor did they
4 comply with the warranties expressly made to purchasers or lessees. Toyota did not
5 provide at the time of sale, and has not provided since then, vehicles conforming to
6 these express warranties.
7

8 562. Furthermore, the limited warranty of repair and/or adjustments to
9 defective parts, fails in its essential purpose because the contractual remedy is
10 insufficient to make the Plaintiffs and the Class whole and because the Defendants
11 have failed and/or have refused to adequately provide the promised remedies within
12 a reasonable time.
13

14 563. Accordingly, recovery by the Plaintiffs is not limited to the limited
15 warranty of repair or adjustments to parts defective in materials or workmanship, and
16 Plaintiffs seek all remedies as allowed by law.
17

18 564. Also, as alleged in more detail herein, at the time that Defendants
19 warranted and sold the vehicles they knew that the vehicles did not conform to the
20 warranties and were inherently defective, and Defendants wrongfully and
21 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
22 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
23 and/or fraudulent pretenses.
24

25 565. Moreover, many of the damages flowing from the Defective Vehicles
26 cannot be resolved through the limited remedy of “replacement or adjustments,” as
27 those incidental and consequential damages have already been suffered due to
28 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or

1 continued failure to provide such limited remedy within a reasonable time, and any
2 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
3 Plaintiffs and the Class whole.

4 566. Finally, due to the Defendants' breach of warranties as set forth herein,
5 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
6 in ALA. CODE § 7-2-608, for a revocation of acceptance of the goods, and for a return
7 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.
8

9 567. Toyota was provided notice of these issues by numerous complaints
10 filed against it, including the instant complaint, and by numerous individual letters
11 and communications sent by Plaintiffs and members of the Class before or within a
12 reasonable amount of time after Toyota issued the recall and the allegations of
13 vehicle defects became public.
14

15 568. As a direct and proximate result of Toyota's breach of express
16 warranties, Plaintiffs and the Class have been damaged in an amount to be
17 determined at trial.
18

19 **COUNT III**

20 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

21 **(Ala. Code § 7-2-314)**

22 569. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 570. Toyota is and was at all relevant times a merchant with respect to motor
25 vehicles.

26 571. A warranty that the Defective Vehicles were in merchantable condition
27 is implied by law in the instant transactions, pursuant to ALA. CODE § 7-2-314.
28

1 572. These Defective Vehicles, when sold and at all times thereafter, were
2 not in merchantable condition and are not fit for the ordinary purpose for which cars
3 are used. Specifically, the Defective Vehicles are inherently defective in that there
4 are defects in the vehicle control systems that permit sudden unintended acceleration
5 to occur; the Defective Vehicles do not have an adequate fail-safe to protect against
6 such SUA events, nor do they have a brake-override; and the ETCS system was not
7 adequately tested.
8

9 573. Toyota was provided notice of these issues by numerous complaints
10 filed against it, including the instant complaint, and by numerous individual letters
11 and communications sent by Plaintiffs and members of the Class before or within a
12 reasonable amount of time after Toyota issued the recall and the allegations of
13 vehicle defects became public.
14

15 574. Plaintiffs and the Class have had sufficient dealings with either the
16 Defendants or their agents (dealerships) to establish privity of contract between
17 Plaintiffs and the Class. Notwithstanding this, privity is not required in this case
18 because Plaintiffs and the Class are intended third-party beneficiaries of contracts
19 between Toyota and its dealers; specifically, they are the intended beneficiaries of
20 Toyota's implied warranties. The dealers were not intended to be the ultimate
21 consumers of the Defective Vehicles and have no rights under the warranty
22 agreements provided with the Defective Vehicles; the warranty agreements were
23 designed for and intended to benefit the ultimate consumers only. Finally, privity is
24 also not required because Plaintiffs' and Class members' Toyotas are dangerous
25 instrumentalities due to the aforementioned defects and nonconformities.
26
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1 575. As a direct and proximate result of Toyota's breach of the warranties of
2 merchantability, Plaintiffs and the Class have been damaged in an amount to be
3 proven at trial.

4
5 **COUNT IV**
6 **REVOCATION OF ACCEPTANCE**
7 **(Ala. Code § 7-2-608)**

8 576. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 577. Plaintiffs identified above demanded revocation and the demands were
11 refused.

12 578. Plaintiffs and the Class had no knowledge of such defects and
13 nonconformities, were unaware of these defects, and reasonably could not have
14 discovered them when they purchased or leased their automobiles from Toyota. On
15 the other hand, Toyota was aware of the defects and nonconformities at the time of
16 sale and thereafter.

17
18 579. Acceptance was reasonably induced by the difficulty of discovery of the
19 defects and nonconformities before acceptance.

20 580. There has been no change in the condition of Plaintiffs' vehicles not
21 caused by the defects and nonconformities.

22
23 581. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
24 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
25 paid.

26 582. Plaintiffs and the Class would suffer economic hardship if they returned
27 their vehicles but did not receive the return of all payments made by them. Because
28

1 Toyota is refusing to acknowledge any revocation of acceptance and return
2 immediately any payments made, Plaintiffs and the Class have not re-accepted their
3 Defective Vehicles by retaining them.

4 583. These defects and nonconformities substantially impaired the value of
5 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
6 basic sources. First, the Defective Vehicles fail in their essential purpose because
7 they present an unreasonably high risk of sudden unintended acceleration (a risk
8 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
9 Second, the repair and adjust warranty has failed of its essential purpose because
10 Toyota cannot repair or adjust the Defective Vehicles.

11 584. Plaintiffs and the Class provided notice of their intent to seek revocation
12 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
13 (and many Class members) have requested that Toyota accept return of their vehicles
14 and return all payments made. Plaintiffs on behalf of themselves and the Class
15 hereby demand revocation and tender their Defective Vehicles.

16 585. Plaintiffs and the Class would suffer economic hardship if they returned
17 their vehicles but did not receive the return of all payments made by them. Because
18 Toyota is refusing to acknowledge any revocation of acceptance and return
19 immediately any payments made, Plaintiffs and the Class have not re-accepted their
20 Defective Vehicles by retaining them, as they must continue using them due to the
21 financial burden of securing alternative means of transport for an uncertain and
22 substantial period of time.

23 586. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25

1 in ALA. CODE § 7-2-608, for a revocation of acceptance of the goods, and for a return
2 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.

3 587. Consequently, Plaintiffs and the Class are entitled to revoke their
4 acceptances, receive all payments made to Toyota, and to all incidental and
5 consequential damages, including the costs associated with purchasing safer vehicles,
6 and all other damages allowable under law, all in amounts to be proven at trial.
7

8 **COUNT V**

9 **BREACH OF CONTRACT/Common Law Warranty**

10 **(Based On Alabama Law)**

11 588. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 589. To the extent Toyota's repair or adjust commitment is deemed not to be
14 a warranty under Alabama's Commercial Code, Plaintiffs plead in the alternative
15 under common law warranty and contract law. Toyota limited the remedies
16 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
17 defects in materials or workmanship of any part supplied by Toyota, and/or
18 warranted the quality or nature of those services to Plaintiffs.
19

20 590. Toyota breached this warranty or contract obligation by failing to repair
21 the Defective Vehicles evidencing a sudden unintended acceleration problem,
22 including those that were recalled, or to replace them.
23

24 591. As a direct and proximate result of Defendants' breach of contract or
25 common law warranty, Plaintiffs and the Class have been damaged in an amount to
26 be proven at trial, which shall include, but is not limited to, all compensatory
27 damages, incidental and consequential damages, and other damages allowed by law.
28

COUNT VI
FRAUD BY CONCEALMENT
(Based On Alabama Law)

592. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

593. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety of their vehicles.

594. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

595. In addition, Defendants had a duty to disclose these omitted material facts because they were known and/or accessible only to Defendants who have superior knowledge and access to the facts, and Defendants knew they were not known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts were material because they directly impact the safety of the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's command, and whether a vehicle will stop or not upon application of the brake by the driver, are material safety concerns. Defendants possessed exclusive knowledge of the defects rendering the Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

1 596. Defendants actively concealed and/or suppressed these material facts, in
2 whole or in part, with the intent to induce Plaintiffs and the Class to purchase the
3 Defective Vehicles at a higher price for the vehicles, which did not match the
4 vehicles' true value.

5 597. Defendants still have not made full and adequate disclosure and
6 continue to defraud Plaintiffs and the Class.
7

8 598. Plaintiffs and the Class were unaware of these omitted material facts
9 and would not have acted as they did if they had known of the concealed and/or
10 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
11 in exclusive control of the material facts and such facts were not known to the public
12 or the Class.
13

14 599. As a result of the concealment and/or suppression of the facts, Plaintiffs
15 and the Class sustained damage. For those Plaintiffs and the Class who elect to
16 affirm the sale, these damages, include the difference between the actual value of
17 that which Plaintiffs and the Class paid and the actual value of that which they
18 received, together with additional damages arising from the sales transaction,
19 amounts expended in reliance upon the fraud, compensation for loss of use and
20 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
21 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
22 restitution and consequential damages.
23

24 600. Defendants' acts were done maliciously, oppressively, deliberately, with
25 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
26 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
27
28

1 punitive damages in an amount sufficient to deter such conduct in the future, which
2 amount is to be determined according to proof.

3 **COUNT VII**
4 **UNJUST ENRICHMENT**
5 **(Based On Alabama Law)**

6 601. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 602. Toyota had knowledge of the safety defects in its vehicles, which it
9 failed to disclose to Plaintiffs and the Class.

10 603. As a result of their wrongful and fraudulent acts and omissions, as set
11 forth above, pertaining to the design defect of their vehicles and the concealment of
12 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
13 value and Toyota obtained monies which rightfully belong to Plaintiffs and the Class.
14

15 604. Toyota appreciated, accepted and retained the non-gratuitous benefits
16 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
17 paid a higher price for vehicles which actually had lower values. It would be
18 inequitable and unjust for Toyota to retain these wrongfully obtained profits.
19

20 605. Plaintiffs, therefore, are entitled to restitution and seek an order
21 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
22 interest.
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1 **ALASKA**

2 **COUNT I**

3 **VIOLATION OF THE ALASKA UNFAIR TRADE PRACTICES**
4 **AND CONSUMER PROTECTION ACT**

5 **(Alaska Stat. § 45.50.471, *et seq.*)**

6 606. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 607. The Alaska Unfair Trade Practices And Consumer Protection Act
9 (“AUTPCPA”) declares unfair methods of competition and unfair or deceptive acts or
10 practices in the conduct of trade or commerce unlawful, including: “(4) representing
11 that goods or services have sponsorship, approval, characteristics, ingredients, uses,
12 benefits, or quantities that they do not have or that a person has a sponsorship,
13 approval, status, affiliation, or connection that the person does not have”;
14 “(6) representing that goods or services are of a particular standard, quality, or grade,
15 or that goods are of a particular style or model, if they are of another”; “(8) advertising
16 goods or services with intent not to sell them as advertised”; “(12) using or employing
17 deception, fraud, false pretense, false promise, misrepresentation, or knowingly
18 concealing, suppressing, or omitting a material fact with intent that others rely upon
19 the concealment, suppression or omission in connection with the sale or advertisement
20 of goods or services whether or not a person has in fact been misled, deceived or
21 damaged”; and “(14) representing that an agreement confers or involves rights,
22 remedies, or obligations which it does not confer or involve, or which are prohibited
23 by law.” ALASKA STAT. § 45.50.471.

24 608. In the course of Toyota’s business, it willfully failed to disclose and
25 actively concealed the dangerous risk of throttle control failure and the lack of
26

1 adequate fail-safe mechanisms in the Defective Vehicles equipped with ETCS as
2 described above. Accordingly, Toyota engaged in unlawful trade practices, including
3 representing that the Defective Vehicles have characteristics, uses, benefits, and
4 qualities which they do not have; representing that the Defective Vehicles are of a
5 particular standard and quality when they are not; advertising the Defective Vehicles
6 with the intent not to sell them as advertised; omitting material facts in describing the
7 Defective Vehicles; and representing that its warranties confers or involves rights,
8 remedies, or obligations which it does not confer or involve, or which are prohibited
9 by law.
10

11 609. Toyota's misrepresentations and omissions described herein have the
12 capacity or tendency to deceive. As a result of these unlawful trade practices,
13 Plaintiffs have suffered ascertainable loss.
14

15 610. Plaintiffs and the Class suffered ascertainable loss caused by Toyota's
16 failure to disclose material information. Plaintiffs and the Class overpaid for their
17 vehicles and did not receive the benefit of their bargain. The value of their Toyota's
18 has diminished now that the safety issues have come to light, and Plaintiffs and the
19 Class own vehicles that are not safe.
20

21 611. Plaintiffs are entitled to recover the greater of three times the actual
22 damages or \$500, pursuant to § 45.50.531(a). Attorneys' fees may also be awarded
23 to the prevailing party pursuant to § 45.50.531(g).
24
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28

COUNT II

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Alaska Stat. § 45.02.314)

612. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

613. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

614. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

615. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. As set forth above in detail, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

616. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

617. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT III
REVOCATION OF ACCEPTANCE
(Alaska Stat. § 45.02.608)

618. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

619. Plaintiffs identified above demanded revocation and the demands were refused.

620. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

621. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

622. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

623. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

624. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 625. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 626. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 627. Finally, due to the Defendants' breach of warranties as set forth herein,
16 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
17 in ALASKA STAT. § 45.02.608, for a revocation of acceptance of the goods, and for a
18 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
19 owned.
20

21 628. Consequently, Plaintiffs and the Class are entitled to revoke their
22 acceptances, receive all payments made to Toyota, and to all incidental and
23 consequential damages, including the costs associated with purchasing safer vehicles,
24 and all other damages allowable under law, all in amounts to be proven at trial.
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COUNT IV
UNJUST ENRICHMENT
(Based On Alaska Law)

629. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

630. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

631. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

632. Toyota appreciated, accepted and retained the non-gratuitous benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits.

633. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

ARIZONA
COUNT I
BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY
(Arizona Common Law)

634. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein. Only Plaintiffs with physical injury to their vehicles assert this claim.

635. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

636. A warranty that the Defective Vehicles were in merchantable condition is implied by common law in the instant transactions.

637. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

638. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

639. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have suffered damage to the property of their vehicles, in an amount to be proven at trial. Alternatively, Plaintiffs and the Class seek rescission.

COUNT II

IN THE ALTERNATIVE, UNJUST ENRICHMENT

(Based On Arizona Law)

640. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

641. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

642. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

643. Toyota appreciated, accepted and retained the benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits. There is no justification for Plaintiffs' and the Class' impoverishment and Toyota's related enrichment.

644. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

1 Vehicles, including, but not limited to, Plaintiffs, and willfully failing to recall or
2 otherwise cure one or more of the defects in the products involved thereby directly
3 and proximately causing the hereinafter described injury.

4 651. The Defective Vehicles were unsafe for use by reason of the fact that
5 they were defective. For example, the Defective Vehicles were defective in their
6 design, guarding, development, manufacture, and lack of permanent, accurate,
7 adequate and fair warning of the characteristics, danger and hazard to the user,
8 prospective user and members of the general public, including, but not limited to,
9 Plaintiffs, and because Defendants failed to recall or otherwise cure one or more
10 defects in the vehicles involved thereby directly and proximately causing the
11 described injuries.
12

13 652. Defendants, and each of them, knew or reasonably should have known
14 that the Defective Vehicles would be purchased and used without all necessary
15 testing or inspection for defects by the Plaintiffs and the Class.
16

17 653. Plaintiffs were not aware of those defects at any time before the incident
18 and occurrence mentioned in this complaint, or else Plaintiffs were unable, as a
19 practical matter, to cure that defective condition.
20

21 654. Plaintiffs used the products in a foreseeable manner.

22 655. As a proximate result of the negligence of Defendants, Plaintiffs
23 suffered injuries and damages.
24
25
26
27
28

COUNT II

BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY

(Ark. Code Ann. §§ 4-2-314)

656. Plaintiffs incorporate the allegations set forth above as is fully set forth herein.

657. In its manufacture and sale of the Defective Vehicles, Toyota impliedly warranted to Plaintiffs and the Class that its vehicles were in merchantable condition and fit for their ordinary purpose.

658. The Defective Vehicles were defective and unfit for their ordinary use due to their tendency to accelerate suddenly and dangerously out of the driver's control and lack of a fail-safe mechanism.

659. Under the Uniform Commercial Code there exists an implied warranty of merchantability.

660. Toyota has breached the warranty of merchantability by having sold its automobiles with defects such that the vehicles were not fit for their ordinary purpose and Plaintiffs and the Class suffered damages as a result.

COUNT III

NEGLIGENCE

(Under Arkansas Law)

661. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

662. Plaintiffs are the owners of Toyota vehicles that were manufactured, assembled, designed, assembled, distributed and otherwise placed in the stream of commerce by Defendants.

1 663. Toyota had a duty to manufacture a product which would be safe for its
2 intended and foreseeable uses and users, including the use to which it was put by
3 Plaintiffs. Toyota breached its duty to Plaintiffs and the Class because it was
4 negligent in the design, development, manufacture, and testing of the Defective
5 Vehicles.
6

7 664. Toyota was negligent in its design, development, manufacture, and
8 testing of the Defective Vehicles because it knew, or in the exercise of reasonable
9 care should have known, that they were prone to sudden and dangerous acceleration
10 and lacked proper fail-safe mechanisms.
11

12 665. Toyota negligently failed to adequately warn and instruct Plaintiffs and
13 the Class of the defective nature of the Defective Vehicles, of the high degree of risk
14 attendant to using them, given that Plaintiffs are Class members and would be
15 ignorant of the said defective.
16

17 666. Whereupon, the Plaintiff respectfully relies upon the RESTATEMENT,
18 SECOND, TORTS 395.
19

20 667. Toyota further breached its duties to Plaintiffs by supplying directly
21 and/or through a third person to be used by such foreseeable persons such as
22 Plaintiffs when:
23

24 a. Toyota knew or had reason to know, that the Defective Vehicles
25 were dangerous or were likely to be dangerous for the use for which they were
26 supplied; and
27

28 b. Toyota failed to exercise reasonable care to inform customers of
the dangerous condition, or of the facts under which the Defective Vehicles are
likely to be dangerous.

1 668. As a result of Toyota's negligence, Plaintiffs and the Class suffered
2 damages.

3
4 **COUNT IV**
5 **REVOCATION OF ACCEPTANCE**
6 **(Ark. Code Ann. § 4-2-608)**

7 669. Plaintiffs reallege and incorporate by reference all paragraphs as though
8 fully set forth herein.

9 670. Plaintiffs identified above demanded revocation and the demands were
10 refused.

11 671. Plaintiffs and the Class had no knowledge of such defects and
12 nonconformities, were unaware of these defects, and reasonably could not have
13 discovered them when they purchased or leased their automobiles from Toyota. On
14 the other hand, Toyota was aware of the defects and nonconformities at the time of
15 sale and thereafter.

16
17 672. Acceptance was reasonably induced by the difficulty of discovery of the
18 defects and nonconformities before acceptance.

19 673. There has been no change in the condition of Plaintiffs' vehicles not
20 caused by the defects and nonconformities.

21 674. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
22 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
23 paid.
24

25 675. Plaintiffs and the Class would suffer economic hardship if they returned
26 their vehicles but did not receive the return of all payments made by them. Because
27 Toyota is refusing to acknowledge any revocation of acceptance and return
28

1 immediately any payments made, Plaintiffs and the Class have not re-accepted their
2 Defective Vehicles by retaining them.

3 676. These defects and nonconformities substantially impaired the value of
4 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
5 basic sources. First, the Defective Vehicles fail in their essential purpose because
6 they present an unreasonably high risk of sudden unintended acceleration (a risk
7 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
8 Second, the repair and adjust warranty has failed of its essential purpose because
9 Toyota cannot repair or adjust the Defective Vehicles.
10

11 677. Plaintiffs and the Class provided notice of their intent to seek revocation
12 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
13 (and many Class members) have requested that Toyota accept return of their vehicles
14 and return all payments made. Plaintiffs on behalf of themselves and the Class
15 hereby demand revocation and tender their Defective Vehicles.
16

17 678. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them, as they must continue using them due to the
22 financial burden of securing alternative means of transport for an uncertain and
23 substantial period of time.
24

25 679. Finally, due to the Defendants' breach of warranties as set forth herein,
26 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
27 in A.C.A. § 4-2-608, for a revocation of acceptance of the goods, and for a return to
28

1 Plaintiffs and the Class of the purchase price of all vehicles currently owned and for
2 such other incidental and consequential damages as allowed under A.C.A. § 4-2-
3 714(2)-(3).

4 680. Consequently, Plaintiffs and the Class are entitled to revoke their
5 acceptances, receive all payments made to Toyota, and to all incidental and
6 consequential damages, including the costs associated with purchasing safer vehicles,
7 and all other damages allowable under law, all in amounts to be proven at trial.

9 **COUNT V**

10 **NEGLIGENT MISREPRESENTATION/FRAUD**

11 **(Ark. Code Ann. § 4-2-721)**

12 681. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 682. As set forth above, Defendants concealed and/or suppressed material
15 facts concerning the safety of their vehicles.

16 683. Defendants had a duty to disclose these safety issues because they
17 consistently marketed their vehicles as safe and proclaimed that safety is one of
18 Toyota's highest corporate priorities. Once Defendants made representations to the
19 public about safety, Defendants were under a duty to disclose these omitted facts,
20 because where one does speak one must speak the whole truth and not conceal any
21 facts which materially qualify those facts stated. One who volunteers information
22 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

23 684. In addition, Defendants had a duty to disclose these omitted material
24 facts because they were known and/or accessible only to Defendants who have
25 superior knowledge and access to the facts, and Defendants knew they were not
26
27
28

1 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
2 were material because they directly impact the safety of the Defective Vehicles.
3 Whether or not a vehicle accelerates only at the driver's command, and whether a
4 vehicle will stop or not upon application of the brake by the driver, are material
5 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
6 the Defective Vehicles inherently more dangerous and unreliable than similar
7 vehicles.
8

9 685. Defendants actively concealed and/or suppressed these material facts, in
10 whole or in part, with the intent to induce Plaintiffs and the Class to purchase the
11 Defective Vehicles at a higher price for the vehicles, which did not match the
12 vehicles' true value.
13

14 686. Defendants still have not made full and adequate disclosure and
15 continue to defraud Plaintiffs and the Class.

16 687. Plaintiffs and the Class were unaware of these omitted material facts
17 and would not have acted as they did if they had known of the concealed and/or
18 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
19 in exclusive control of the material facts and such facts were not known to the public
20 or the Class.
21

22 688. As a result of the misrepresentation concealment and/or suppression of
23 the facts, Plaintiffs and the Class sustained damage. For those Plaintiffs and the
24 Class who elect to affirm the sale, these damages, pursuant to A.C.A. § 4-2-72,
25 include the difference between the actual value of that which Plaintiffs and the Class
26 paid and the actual value of that which they received, together with additional
27 damages arising from the sales transaction, amounts expended in reliance upon the
28

1 fraud, compensation for loss of use and enjoyment of the property, and/or lost
2 profits. For those Plaintiffs and the Class who want to rescind the purchase, then
3 those Plaintiffs and the Class are entitled to restitution and consequential damages
4 pursuant to A.C.A. § 4-2-72.

5
6 689. Defendants' acts were done maliciously, oppressively, deliberately, with
7 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
8 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
9 punitive damages in an amount sufficient to deter such conduct in the future, which
10 amount is to be determined according to proof.

11
12 **COUNT VI**
13 **UNJUST ENRICHMENT**
14 **(Based On Arkansas Law)**

15 690. Plaintiffs reallege and incorporate by reference all paragraphs as though
16 fully set forth herein.

17 691. As a result of their wrongful and fraudulent acts and omissions, as set
18 forth above, pertaining to the design defect of their vehicles and the concealment of
19 the defect, Defendants charged a higher price for their vehicles than the vehicles'
20 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

21 692. Defendants enjoyed the benefit of increased financial gains, to the
22 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
23 actually had lower values. It would be inequitable and unjust for Defendants to
24 retain these wrongfully obtained profits.

25
26 693. Plaintiffs, therefore, seek an order establishing Defendants as
27 constructive trustees of the profits unjustly obtained, plus interest.
28

CALIFORNIA

COUNT I

**VIOLATION OF THE SONG-BEVERLY CONSUMER WARRANTY ACT
FOR BREACH OF EXPRESS WARRANTIES**

(Cal. Civ. Code §§ 1793.2(D) & 1791.2)

694. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

695. Plaintiffs and the Class who purchased the Toyota vehicles in California are “buyers” within the meaning of CAL. CIV. CODE § 1791.

a. The Toyota vehicles are “consumer goods” within the meaning of CAL. CIV. CODE § 1791(a).

696. Toyota is a “manufacturer” of the Toyota vehicles within the meaning of CAL. CIV. CODE § 1791(j).

697. Plaintiffs and the Class bought/leased new motor vehicles manufactured by Toyota.

698. Toyota made express warranties to Plaintiffs and the Class within the meaning of CAL. CIV. CODE §§ 1791.2 and 1793.2, both in its warranty manual and advertising, as described above.

699. Toyota’s vehicles had and continue to have sudden unintended acceleration and lack of brake fail-safe mechanism defects that were and continue to be covered by Toyota’s express warranties and these defects substantially impair the use, value, and safety of Toyota’s vehicles to reasonable consumers like Plaintiffs and the Class.

700. Plaintiffs and the Class delivered their vehicles to Toyota or its authorized repair facility for repair of the defects and/or notified Toyota in writing of

1 the need for repair of the defects because they reasonably could not deliver the
2 vehicles to Toyota or its authorized repair facility due to fear of unintended
3 acceleration.

4 701. Toyota and its authorized repair facilities failed and continue to fail to
5 repair the vehicles to match Toyota's written warranties after a reasonable number of
6 opportunities to do so.

8 702. Plaintiffs and the Class gave Toyota or its authorized repair facilities at
9 least two opportunities to fix the defects unless only one repair attempt was possible
10 because the vehicle was later destroyed or because Toyota or its authorized repair
11 facility refused to attempt the repair.

12 703. Toyota did not promptly replace or buy back the vehicles of Plaintiffs
13 and the Class.

14 704. As a result of Toyota's breach of its express warranties, Plaintiffs and
15 the Class received goods whose dangerous condition substantially impairs their value
16 to Plaintiffs and the Class. Plaintiffs and the Class have been damaged as a result of
17 the diminished value of the Defendants' products, the products' malfunctioning, and
18 the nonuse of their vehicles.

19 705. Pursuant to CAL. CIV. CODE §§ 1793.2 & 1794, Plaintiffs and the Class
20 are entitled to damages and other legal and equitable relief including, at their
21 election, the purchase price of their vehicles, or the overpayment or diminution in
22 value of their vehicles.

23 706. Pursuant to CAL. CIV. CODE § 1794, Plaintiffs and the Class are entitled
24 to costs and attorneys' fees.

COUNT II

**VIOLATION OF THE SONG-BEVERLY CONSUMER WARRANTY ACT
FOR BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**

(Cal. Civ. Code §§ 1792 & 1791.1)

707. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

708. Plaintiffs and the Class who purchased the Toyota vehicles in California are “buyers” within the meaning of CAL. CIV. CODE § 1791.

709. The Toyota vehicles are “consumer goods” within the meaning of CIV. CODE § 1791(a).

710. Toyota is a “manufacturer” of the Toyota vehicles within the meaning of CAL. CIV. CODE § 1791(j).

711. Toyota impliedly warranted to Plaintiffs and the Class that its vehicles were “merchantable” within the meaning of CAL. CIV. CODE §§ 1791.1(a) & 1792, however, the Toyota vehicles do not have the quality that a buyer would reasonably expect.

712. CAL. CIV. CODE § 1791.1(a) states:

“Implied warranty of merchantability” or “implied warranty that goods are merchantable” means that the consumer goods meet each of the following:

- (1) Pass without objection in the trade under the contract description.
- (2) Are fit for the ordinary purposes for which such goods are used.

1 (3) Are adequately contained, packaged, and labeled.

2 (4) Conform to the promises or affirmations of fact
3 made on the container or label.

4 713. The Toyota vehicles would not pass without objection in the automotive
5 trade because of the sudden acceleration and lack of a brake fail-safe mechanism
6 defects.
7

8 714. Because of the sudden acceleration and lack of a brake fail-safe
9 mechanism defects, they are not safe to drive and thus not fit for ordinary purposes.

10 715. The vehicles are not adequately labeled because the labeling fails to
11 disclose the sudden acceleration and lack of a brake fail-safe mechanism defects.
12

13 716. Toyota breached the implied warranty of merchantability by
14 manufacturing and selling vehicles containing a sudden acceleration and lack of a
15 brake fail-safe mechanism defects. Furthermore, these defects have caused Plaintiffs
16 and the Class to not receive the benefit of their bargain and have caused vehicles to
17 depreciate in value.

18 717. As a direct and proximate result of Toyota's breach of the implied
19 warranty of merchantability, Plaintiffs and the Class received goods whose
20 dangerous condition substantially impairs their value to Plaintiffs and the Class.
21 Plaintiffs and the Class have been damaged as a result of the diminished value of
22 Toyota's products, the products' malfunctioning, and the nonuse of their vehicles.
23

24 718. Pursuant to CAL. CIV. CODE §§ 1791.1(d) & 1794, Plaintiffs and the
25 Class are entitled to damages and other legal and equitable relief including, at their
26 election, the purchase price of their vehicles, or the overpayment or diminution in
27 value of their vehicles.
28

COLORADO

VIOLATIONS OF THE COLORADO CONSUMER PROTECTION ACT
(Col. Rev. Stat. § 6-1-101. et seq.)

721. Defendants are “persons” under § 6-1-102(6) of the Colorado Consumer Protection Act (“Colorado CPA”), COL. REV. STAT. § 6-1-101 *et seq.*

723. In the course of their business, Defendants both participated in deceptive trade practices that violated the Colorado CPA, as described above and below. Defendants each are directly liable for these violations of law. TMC also is liable for TMS's violations of the Colorado CPA because TMS acts as TMC's general agent in the United States for purposes of sales and marketing.

1 725. Defendants engaged in deceptive trade practices prohibited by the
2 Colorado CPA, including (1) knowingly making a false representation as to the
3 characteristics, uses, and benefits of the Defective Vehicles that had the capacity or
4 tendency to deceive Plaintiffs; (2) representing that the Defective Vehicles are of a
5 particular standard, quality, and grade even though Defendants knew or should have
6 known they are not; (3) advertising the Defective Vehicles with the intent not to sell
7 them as advertised; and (4) failing to disclose material information concerning the
8 Defective Vehicles that was known to Defendants at the time of advertisement or sale
9 with the intent to induce Plaintiffs to purchase or lease the Defective Vehicles.
10

11 726. Defendants knew that the ETCS in the Defective Vehicles was
12 defectively designed or manufactured, would fail without warning, and was not
13 suitable for its intended use of regulating throttle position and vehicle speed based on
14 driver commands. Defendants nevertheless failed to warn Plaintiffs about these
15 inherent dangers despite having a duty to do so.
16

17 727. Defendants' practices significantly the public as actual consumers of the
18 Defective Vehicles, which pose an unreasonable risk of death or serious bodily injury
19 to Plaintiffs, passengers, other motorists, pedestrians, and the public at large, because
20 they are susceptible to incidents of sudden unintended acceleration.
21

22 728. Whether or not a vehicle (a) accelerates only when commanded to do so
23 and (b) decelerates and stops when commanded to do so are facts that a reasonable
24 consumer would consider important in selecting a vehicle to purchase or lease.
25 When Plaintiffs bought a Toyota Vehicle for personal, family, or household
26 purposes, they reasonably expected the vehicle would (a) not accelerate unless
27 commanded to do so by application of the accelerator pedal or other driver-
28

1 controlled means; (b) decelerate to a stop when the brake pedal was applied, and was
2 equipped with any necessary fail-safe mechanisms including a brake-override.

3 729. Defendants' deceptive practices were likely to and did in fact deceive
4 reasonable consumers, including Plaintiffs, about the true safety and reliability of the
5 Defective Vehicles.
6

7 730. Plaintiffs suffered injury-in-fact to their legally protected property
8 interests as a result of Defendants' violations of the Colorado CPA detailed above.
9 Plaintiffs currently own or lease, or within the class period have owned or leased, the
10 Defective Vehicles that are defective and inherently unsafe. ETCS defects and the
11 resulting unintended acceleration incidents have caused the value of the Defective
12 Vehicles to plummet.
13

14 731. Pursuant to § 6-1-113(2) of the Colorado CPA, Plaintiffs seek monetary
15 relief against TMS and TMC measured as the greater of (a) the amount of actual
16 damages sustained, (b) statutory damages in the amount of \$500 for each Plaintiff, or
17 (c) three times the amount of actual damages if Plaintiffs establish that TMS and
18 TMC engaged in bad faith conduct.
19

20 **COUNT II**
21 **BREACH OF EXPRESS WARRANTY**
22 **(Col. Rev. Stat. § 4-2-313)**

23 732. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 733. Toyota is and was at all relevant times a merchant with respect to motor
26 vehicles under COL. REV. STAT. § 4-2-104.
27
28

1 734. In the course of selling its vehicles, Toyota expressly warranted in
2 writing that the vehicles were covered by a Basic Warranty.

3 735. Toyota breached the express warranty to repair and adjust to correct
4 defects in materials and workmanship of any part supplied by Toyota. Toyota has
5 not repaired or adjusted, and has been unable to repair or adjust, the Defective
6 Vehicles' materials and workmanship defects.

7
8 736. In addition to this Basic Warranty, Toyota expressly warranted several
9 attributes, characteristics and qualities, as set forth above.

10 737. These warranties are only a sampling of the numerous warranties that
11 Toyota made relating to safety, reliability and operation, which are more fully
12 outlined in Section IV.A., *supra*. Generally these express warranties promise
13 heightened, superior, and state-of-the-art safety, reliability, performance standards,
14 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
15 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
16 Toyota to be made by salespeople. These affirmations and promises were part of the
17 basis of the bargain between the parties.
18

19 738. These additional warranties were also breached because the Defective
20 Vehicles were not fully operational, safe, or reliable (and remained so even after the
21 problems were acknowledged and a recall "fix" was announced), nor did they
22 comply with the warranties expressly made to purchasers or lessees. Toyota did not
23 provide at the time of sale, and has not provided since then, vehicles conforming to
24 these express warranties.
25

26 739. Furthermore, the limited warranty of repair and/or adjustments to
27 defective parts, fails in its essential purpose because the contractual remedy is
28

1 insufficient to make the Plaintiffs and the Class whole and because the Defendants
2 have failed and/or have refused to adequately provide the promised remedies within
3 a reasonable time.

4 740. Accordingly, recovery by the Plaintiffs is not limited to the limited
5 warranty of repair or adjustments to parts defective in materials or workmanship, and
6 Plaintiffs seek all remedies as allowed by law.

7
8 741. Also, as alleged in more detail herein, at the time that Defendants
9 warranted and sold the vehicles they knew that the vehicles did not conform to the
10 warranties and were inherently defective, and Defendants wrongfully and
11 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
12 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
13 and/or fraudulent pretenses. The enforcement under these circumstances of any
14 limitations whatsoever precluding the recovery of incidental and/or consequential
15 damages is unenforceable.
16

17 742. Moreover, many of the damages flowing from the Defective Vehicles
18 cannot be resolved through the limited remedy of “replacement or adjustments,” as
19 those incidental and consequential damages have already been suffered due to
20 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
21 continued failure to provide such limited remedy within a reasonable time, and any
22 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make them
23 whole.
24

25 743. Finally, due to the Defendants’ breach of warranties as set forth herein,
26 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
27 in COL. REV. STAT. § 4-2-711, for a revocation of acceptance of the goods, and for a
28

1 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
2 owned and for such other incidental and consequential damages as allowed under
3 COL. REV. STAT. §§ 4-2-711 and 4-2-608.

4 744. Toyota was provided notice of these issues by numerous complaints
5 filed against it, including the instant complaint, and by numerous individual letters
6 and communications sent by Plaintiffs and the Class before or within a reasonable
7 amount of time after Toyota issued the recall and the allegations of vehicle defects
8 became public.

9 745. As a direct and proximate result of Toyota's breach of express
10 warranties, Plaintiffs and the Class have been damaged in an amount to be
11 determined at trial.

12
13
14 **COUNT III**
15 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
16 **(Col. Rev. Stat. § 4-2-314)**

17 746. Plaintiffs incorporate by reference and reallege all paragraphs alleged
18 herein.

19 747. Toyota is and was at all relevant times a merchant with respect to motor
20 vehicles under COL. REV. STAT. § 4-2-104.

21 748. A warranty that the Defective Vehicles were in merchantable condition
22 was implied by law in the instant transaction, pursuant to COL. REV. STAT. § 4-2-314.

23 749. These vehicles, when sold and at all times thereafter, were not in
24 merchantable condition and are not fit for the ordinary purpose for which cars are
25 used. Specifically, the Defective Vehicles are inherently defective in that there are
26 defects in the vehicle control systems that permit sudden unintended acceleration to
27
28

1 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
2 such SUA events, nor do they have a brake-override; and the ETCS system was not
3 adequately tested.

4 750. Toyota was provided notice of these issues by numerous complaints
5 filed against it, including the instant complaint, and by numerous individual letters
6 and communications sent by Plaintiffs and the Class before or within a reasonable
7 amount of time after Toyota issued the recall and the allegations of vehicle defects
8 became public.
9

10 751. As a direct and proximate result of Toyota's breach of the warranties of
11 merchantability, Plaintiffs and the Class have been damaged in an amount to be
12 proven at trial.
13

14 **COUNT IV**
15 **REVOCATION OF ACCEPTANCE**
16 **(Col. Rev. Stat. § 4-2-608)**

17 752. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 753. Plaintiffs identified above demanded revocation and the demands were
20 refused.
21

22 754. Plaintiffs and the Class had no knowledge of such defects and
23 nonconformities, were unaware of these defects, and reasonably could not have
24 discovered them when they purchased or leased their automobiles from Toyota. On
25 the other hand, Toyota was aware of the defects and nonconformities at the time of
26 sale and thereafter.
27
28

1 755. Acceptance was reasonably induced by the difficulty of discovery of the
2 defects and nonconformities before acceptance.

3 756. There has been no change in the condition of Plaintiffs' vehicles not
4 caused by the defects and nonconformities.

5 757. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
6 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
7 paid.
8

9 758. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them.
14

15 759. These defects and nonconformities substantially impaired the value of
16 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
17 basic sources. First, the Defective Vehicles fail in their essential purpose because
18 they present an unreasonably high risk of sudden unintended acceleration (a risk
19 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
20 Second, the repair and adjust warranty has failed of its essential purpose because
21 Toyota cannot repair or adjust the Defective Vehicles.
22

23 760. Plaintiffs and the Class provided notice of their intent to seek revocation
24 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
25 (and many Class members) have requested that Toyota accept return of their vehicles
26 and return all payments made. Plaintiffs on behalf of themselves and the Class
27 hereby demand revocation and tender their Defective Vehicles.
28

1 761. Plaintiffs and the Class would suffer economic hardship if they returned
2 their vehicles but did not receive the return of all payments made by them. Because
3 Toyota is refusing to acknowledge any revocation of acceptance and return
4 immediately any payments made, Plaintiffs and the Class have not re-accepted their
5 Defective Vehicles by retaining them, as they must continue using them due to the
6 financial burden of securing alternative means of transport for an uncertain and
7 substantial period of time.

9 762. Finally, due to the Defendants' breach of warranties as set forth herein,
10 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
11 in COL. REV. STAT. § 4-2-711, for a revocation of acceptance of the goods, and for a
12 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
13 owned and for such other incidental and consequential damages as allowed under
14 COL. REV. STAT. § 4-2-711.

16 763. Consequently, Plaintiffs and the Class are entitled to revoke their
17 acceptances, receive all payments made to Toyota, and to all incidental and
18 consequential damages, including the costs associated with purchasing safer vehicles,
19 and all other damages allowable under law, all in amounts to be proven at trial.

21 COUNT V

22 BREACH OF COMMON LAW WARRANTY

23 (Based On Colorado Law)

24 764. Plaintiffs incorporate by reference and reallege all paragraphs as though
25 fully set forth herein.

26 765. To the extent Toyota's repair or adjust commitment is deemed not to be
27 a warranty under the Uniform Commercial Code as adopted by Colorado, Plaintiffs
28

1 plead in the alternative under common law warranty and contract law. Toyota
2 limited the remedies available to Plaintiffs and the Class to just repairs and
3 adjustments needed to correct defects in materials or workmanship of any part
4 supplied by Toyota, and/or warranted the quality or nature of those services to
5 Plaintiffs.
6

7 766. Toyota breached this warranty or contract obligation by failing to repair
8 the Defective Vehicles evidencing a sudden unintended acceleration problem,
9 including those that were recalled, or to replace them.

10 767. As a direct and proximate result of Defendants' breach of contract or
11 common law warranty, Plaintiffs and the Class have been damaged in an amount to
12 be proven at trial, which shall include, but is not limited to, all compensatory
13 damages, incidental and consequential damages, and other damages allowed by law.
14

15 **COUNT VI**
16 **FRAUD BY CONCEALMENT**
17 **(Based On Colorado Law)**

18 768. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 769. As set forth above, Defendants concealed and/or suppressed material
21 facts concerning the safety of their vehicles that in equity and good conscience
22 should be disclosed.
23

24 770. Defendants had a duty to disclose these safety issues because they
25 consistently marketed their vehicles as safe and proclaimed that safety is one of
26 Toyota's highest corporate priorities. Once Defendants made representations to the
27 public about safety, Defendants were under a duty to disclose these omitted facts,
28

1 because where one does speak one must speak the whole truth and not conceal any
2 facts which materially qualify those facts stated. One who volunteers information
3 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

4 771. In addition, Defendants had a duty to disclose these omitted material
5 facts because they were known and/or accessible only to Defendants who have
6 superior knowledge and access to the facts, and Defendants knew they were not
7 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
8 were material because they directly impact the safety of the Defective Vehicles.
9 Whether or not a vehicle accelerates only at the driver's command, and whether a
10 vehicle will stop or not upon application of the brake by the driver, are material
11 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
12 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

13 772. Defendants actively and knowingly concealed and/or suppressed these
14 material facts, in whole or in part, with the intent to induce Plaintiffs and the Class to
15 purchase the Defective Vehicles at a higher price for the vehicles, which did not
16 match the vehicles' true value.

17 773. Defendants still have not made full and adequate disclosure and
18 continue to defraud Plaintiffs and the Class.

19 774. Plaintiffs and the Class were unaware of these omitted material facts
20 and would not have acted as they did if they had known of the concealed and/or
21 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
22 in exclusive control of the material facts and such facts were not known to the public
23 or the Class.

1 775. As a result of the concealment and/or suppression of the facts, Plaintiffs
2 and the Class sustained damage. Plaintiffs and the Class reserve their right to elect
3 either to (a) rescind their purchase or lease of the Defective Vehicles and obtain
4 restitution (b) affirm their purchase or lease of the Defective Vehicles and recover
5 damages.
6

7 776. Defendants acts were done fraudulently, maliciously, or willfully for
8 purposes of COL. REV. STAT. § 13-21-102. Defendants' conduct warrants an
9 assessment of exemplary damages in an amount which is equal to the amount of the
10 actual damages awarded to Plaintiffs and the Class.
11

12 **COUNT VII**
13 **UNJUST ENRICHMENT**
14 **(Based On Colorado Law)**

15 777. Plaintiffs reallege and incorporate by reference all paragraphs as though
16 fully set forth herein.

17 778. As a result of their wrongful and fraudulent acts and omissions, as set
18 forth above, pertaining to the design defect of their vehicles and the concealment of
19 the defect, Defendants charged a higher price for their vehicles than the vehicles'
20 true value and Defendants obtained monies which rightfully belong to Plaintiffs.
21

22 779. Defendants enjoyed the benefit of increased financial gains, to the
23 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
24 actually had lower values. It would be inequitable and unjust for Defendants to
25 retain these wrongfully obtained profits.

26 780. Plaintiffs, therefore, seek an order establishing Defendants as
27 constructive trustees of the profits unjustly obtained, plus interest.
28

1 **CONNECTICUT**

2 **COUNT I**

3 **VIOLATION OF CONNECTICUT UNLAWFUL TRADE PRACTICES ACT**
4 **(Conn. Gen. Stat. § 42-110A, *et seq.*)**

5 781. Plaintiffs reallege and incorporate by reference all paragraphs as though
6 fully set forth herein.

7 782. The Connecticut Unfair Trade Practices Act (“CUTPA”) provides: “No
8 person shall engage in unfair methods of competition and unfair or deceptive acts or
9 practices in the conduct of any trade or commerce.” CONN. GEN. STAT. § 42-
10 110b(a).

11 783. Toyota is a person within the meaning of CUTPA. CONN. GEN. STAT.
12 § 42-110a(3).

13 784. In the course of Toyota’s business, it willfully failed to disclose and
14 actively concealed the dangerous risk of throttle control failure and the lack of
15 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
16 described above. This was a deceptive act in that Toyota represented that Defective
17 Vehicles have characteristics, uses, benefits, and qualities which they do not have;
18 represented that Defective Vehicles are of a particular standard and quality when they
19 are not; and advertised Defective Vehicles with the intent not to sell them as
20 advertised. Toyota knew or should have known that its conduct violated the CUTPA.
21
22

23 785. Toyota engaged in a deceptive trade practice when it failed to disclose
24 material information concerning the Toyota vehicles which was known to Toyota at
25 the time of the sale. Toyota deliberately withheld the information about the vehicles’
26
27
28

1 propensity for rapid, uncontrolled acceleration in order to ensure that consumers
2 would purchase its vehicles and to induce the consumer to enter into a transaction.

3 786. Toyota's conduct was unfair because it causes substantial injury to
4 consumers.

5 787. The propensity of the Toyotas for rapid, uncontrolled acceleration and
6 their lack of a fail-safe mechanism were material to Plaintiffs and the Class. Had
7 Plaintiffs and the Class known that their Toyotas had these serious safety defects,
8 they would not have purchased their Toyotas.

9 788. Plaintiffs and the Class suffered ascertainable loss caused by Toyota's
10 deceptive and unfair practices. Plaintiffs and the Class overpaid for their vehicles
11 and did not receive the benefit of their bargain. The value of their Toyotas have
12 diminished now that the safety issues have come to light, and Plaintiffs and the Class
13 own vehicles that are not safe.

14 789. Toyota engaged in conduct amounting to a particularly aggravated,
15 deliberate disregard of the rights and safety of others.

16 790. Plaintiffs are entitled to recover their actual damages, punitive damages,
17 and attorneys' fees pursuant to CONN. GEN. STAT. § 42-110g.

18 791. Pursuant to CONN. GEN. STAT. § 42-110g(c), Plaintiffs will mail a copy
19 of the complaint to Connecticut's Attorney General.

20
21
22
23 **COUNT II**
24 **BREACH OF CONTRACT**
25 **(Based On Connecticut Law)**

26 792. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.

793. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Connecticut's Commercial Code, Plaintiffs plead in the alternative under common law and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

794. Toyota breached this contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

795. As a direct and proximate result of Defendants' breach of contract, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT III

IN THE ALTERNATIVE, UNJUST ENRICHMENT

(Based On Connecticut Law)

796. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

797. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

798. As a result of its wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for its vehicles than the vehicles' true value. Toyota accordingly received a benefit from Plaintiffs to Plaintiffs' detriment.

799. Toyota appreciated, accepted and retained the benefits conferred by Plaintiffs and other Class members, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits.

800. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

DELAWARE

COUNT I

VIOLATION OF THE DELAWARE CONSUMER FRAUD ACT

(6 Del. Code § 2513, et seq.)

801. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

802. The Delaware Consumer Fraud Act (“CFA”) prohibits the “act, use or employment by any person of any deception, fraud, false pretense, false promise, misrepresentation, or the concealment, suppression, or omission of any material fact with intent that others rely upon such concealment, suppression or omission, in connection with the sale, lease or advertisement of any merchandise, whether or not any person has in fact been misled, deceived or damaged thereby.” 6 DEL. CODE § 2513(a).

803. Toyota is a person with the meaning of 6 DEL. CODE § 2511(7).

804. As described herein Toyota made false representations regarding the safety and reliability of its vehicles and concealed important facts regarding the tendency of its vehicles to suddenly and uncontrollably accelerate and regarding the

1 lack of a fail-safe mechanism to override this unintended acceleration. Toyota
2 intended that others rely on these misrepresentations and omissions in connection
3 with the sale and lease of its vehicles.

4 805. Toyota's actions as set forth above occurred in the conduct of trade or
5 commerce.
6

7 806. Toyota's conduct proximately caused injuries to Plaintiffs and the Class.

8 807. Plaintiffs and the Class were injured as a result of Toyota's conduct in
9 that Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
10 their bargain, and their vehicles have suffered a diminution in value. These injuries
11 are the direct and natural consequence of Toyota's misrepresentations and omissions.
12

13 808. Plaintiffs are entitled to recover damages, as well as punitive damages
14 for Toyota's gross and aggravated misconduct.

15 **COUNT II**

16 **VIOLATION OF THE DELAWARE DECEPTIVE TRADE PRACTICES ACT**

17 **(6 Del. Code § 2532, *et seq.*)**

18 809. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 810. Delaware's Deceptive Trade Practices Act ("DTPA") prohibits a person
21 from engaging in a "deceptive trade practice," which includes: "(5) Represent[ing]
22 that goods or services have sponsorship, approval, characteristics, ingredients, uses,
23 benefits, or quantities that they do not have, or that a person has a sponsorship,
24 approval, status, affiliation, or connection that the person does not have";
25 "(7) Represent[ing] that goods or services are of a particular standard, quality, or
26 grade, or that goods are of a particular style or model, if they are of another";
27
28

1 “(9) Advertis[ing] goods or services with intent not to sell them as advertised”; or
2 “(12) Engag[ing] in any other conduct which similarly creates a likelihood of
3 confusion or of misunderstanding.”

4 811. Toyota is a person with the meaning of 6 Del. Code § 2531(5).

5 812. In the course of Toyota’s business, it willfully failed to disclose and
6 actively concealed the dangerous risk of throttle control failure and the lack of
7 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
8 described above. Accordingly, Toyota engaged in unlawful trade practices,
9 including representing that Defective Vehicles have characteristics, uses, benefits,
10 and qualities which they do not have; representing that Defective Vehicles are of a
11 particular standard and quality when they are not; advertising Defective Vehicles
12 with the intent not to sell them as advertised; and otherwise engaging in conduct
13 likely to deceive.
14

15 813. Toyota’s actions as set forth above occurred in the conduct of trade or
16 commerce.
17

18 814. Toyota’s conduct proximately caused injuries to Plaintiffs and the Class.
19

20 815. Plaintiffs and the Class were injured as a result of Toyota’s conduct in
21 that Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
22 their bargain, and their vehicles have suffered a diminution in value. These injuries
23 are the direct and natural consequence of Toyota’s misrepresentations and omissions.

24 816. Plaintiffs seek injunctive relief and, if awarded damages under
25 Delaware common law or Delaware Consumer Fraud Act, treble damages pursuant
26 to 6 DEL. CODE § 2533(c).
27
28

1 817. Plaintiffs also seek punitive damages based on the outrageousness and
2 recklessness of Toyota's conduct and its high net worth.

3 **COUNT III**
4 **BREACH OF EXPRESS WARRANTY**
5 **(6 Del. Code § 2-313)**

6 818. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 819. Toyota is and was at all relevant times a merchant with respect to motor
9 vehicles.

10 820. . In the course of selling its vehicles, Toyota expressly warranted
11 in writing that the Vehicles were covered by a Basic Warranty.

12 821. 4. Toyota breached the express warranty to repair and adjust to
13 correct defects in materials and workmanship of any part supplied by Toyota.
14 Toyota has not repaired or adjusted, and has been unable to repair or adjust, the
15 Vehicles' materials and workmanship defects.

16 822. In addition to this Basic Warranty, Toyota expressly warranted several
17 attributes, characteristics and qualities.

18 823. These warranties are only a sampling of the numerous warranties that
19 Toyota made relating to safety, reliability and operation, which are more fully
20 outlined in Section IV.A., *supra*. Generally these express warranties promise
21 heightened, superior, and state-of-the-art safety, reliability, performance standards,
22 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
23 advertisements, in Toyota's "e brochures," and in uniform statements provided by
24
25
26
27
28

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 824. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 825. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 826. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 827. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses.
26

27 828. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 829. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in 6 DEL. CODE. § 2-608, for a revocation of acceptance of the goods, and for a
10 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
11 owned.
12

13 830. Toyota was provided notice of these issues by numerous complaints
14 filed against it, including the instant complaint, and by numerous individual letters
15 and communications sent by Plaintiffs and the Class before or within a reasonable
16 amount of time after Toyota issued the recall and the allegations of vehicle defects
17 became public.
18

19 831. As a direct and proximate result of Toyota's breach of express
20 warranties, Plaintiffs and the Class have been damaged in an amount to be
21 determined at trial.
22

23 **COUNT IV**

24 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

25 **(6 Del. Code § 2-314)**

26 832. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 833. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles.

3 834. A warranty that the Defective Vehicles were in merchantable condition
4 is implied by law in the instant transactions.
5

6 835. These vehicles, when sold and at all times thereafter, were not in
7 merchantable condition and are not fit for the ordinary purpose for which cars are
8 used. Specifically, the Defective Vehicles are inherently defective in that there are
9 defects in the vehicle control systems that permit sudden unintended acceleration to
10 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
11 such SUA events, nor do they have a brake-override; and the ETCS system was not
12 adequately tested.
13

14 836. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 837. As a direct and proximate result of Toyota's breach of the warranties of
21 merchantability, Plaintiffs and the Class have been damaged in an amount to be
22 proven at trial.

23 **COUNT V**
24 **REVOCATION OF ACCEPTANCE**
25 **(6 Del. Code § 2-608)**

26 838. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 839. Plaintiffs identified above demanded revocation and the demands were
2 refused.

3 840. Plaintiffs and the Class had no knowledge of such defects and
4 nonconformities, were unaware of these defects, and reasonably could not have
5 discovered them when they purchased or leased their automobiles from Toyota. On
6 the other hand, Toyota was aware of the defects and nonconformities at the time of
7 sale and thereafter.

8
9 841. Acceptance was reasonably induced by the difficulty of discovery of the
10 defects and nonconformities before acceptance.

11 842. There has been no change in the condition of Plaintiffs' vehicles not
12 caused by the defects and nonconformities.

13
14 843. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
15 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
16 paid.

17 844. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them.

22
23 845. These defects and nonconformities substantially impaired the value of
24 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
25 basic sources. First, the Defective Vehicles fail in their essential purpose because
26 they present an unreasonably high risk of sudden unintended acceleration (a risk
27 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
28

1 Second, the repair and adjust warranty has failed of its essential purpose because
2 Toyota cannot repair or adjust the Defective Vehicles.

3 846. Plaintiffs and the Class provided notice of their intent to seek revocation
4 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
5 (and many Class members) have requested that Toyota accept return of their vehicles
6 and return all payments made. Plaintiffs on behalf of themselves and the Class
7 hereby demand revocation and tender their Defective Vehicles.
8

9 847. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them, as they must continue using them due to the
14 financial burden of securing alternative means of transport for an uncertain and
15 substantial period of time.
16

17 848. Finally, due to the Defendants' breach of warranties as set forth herein,
18 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
19 in 6 DEL. CODE § 2-608, for a revocation of acceptance of the goods, and for a return
20 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.
21

22 849. Consequently, Plaintiffs and the Class are entitled to revoke their
23 acceptances, receive all payments made to Toyota, and to all incidental and
24 consequential damages, including the costs associated with purchasing safer vehicles,
25 and all other damages allowable under law, all in amounts to be proven at trial.
26
27
28

COUNT VI

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On Delaware Law)

850. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

851. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Delaware's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

852. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

853. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VII

IN THE ALTERNATIVE, UNJUST ENRICHMENT

(Based On Delaware Law)

854. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 855. Toyota had knowledge of the safety defects in its vehicles, which it
2 failed to disclose to Plaintiffs and the Class.

3 856. As a result of their wrongful and fraudulent acts and omissions, as set
4 forth above, pertaining to the design defect of their vehicles and the concealment of
5 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
6 value and Toyota obtained monies which rightfully belong to Plaintiffs.
7

8 857. Toyota appreciated, accepted and retained the benefits conferred by
9 Plaintiffs and other Class members, who without knowledge of the safety defects
10 paid a higher price for vehicles which actually had lower values. It would be
11 inequitable and unjust for Toyota to retain these wrongfully obtained profits. There
12 is no justification for Plaintiffs' and Class' impoverishment and Toyota's related
13 enrichment.
14

15 858. Plaintiffs, therefore, are entitled to restitution and seek an order
16 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
17 interest.
18

19 **DISTRICT OF COLUMBIA**
20 **COUNT I**
21 **VIOLATION OF THE CONSUMER PROTECTION PROCEDURES ACT**
22 **(D.C. Code § 28-3901 *et seq.*)**

23 859. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 860. Defendants are "persons" under D.C. CODE § 28-3901(a)(1).

26 861. Plaintiffs are "consumers," as defined by D.C. CODE § 28-3901(1)(2),
27 who purchased or leased one or more Defective Vehicles.
28

1 862. Defendants both participated in unfair or deceptive acts or practices that
2 violated the Consumer Protection Procedures Act (“CPPA”), D.C. CODE § 28-3901,
3 *et seq.*, as described above and below. Defendants each are directly liable for these
4 violations of law. TMC also is liable for TMS’s violations of the CPPA because
5 TMS acts as TMC’s general agent in the United States for purposes of sales and
6 marketing.
7

8 863. By failing to disclose and actively concealing the dangerous risk of
9 throttle control failure and the lack of adequate fail-safe mechanisms in Defective
10 Vehicles equipped with ETCS, Defendants engaged in unfair or deceptive practices
11 prohibited by the CPPA, D.C. CODE § 28-3901, *et seq.*, including (1) representing
12 that Defective Vehicles have characteristics, uses, benefits, and qualities which they
13 do not have, (2) representing that Defective Vehicles are of a particular standard,
14 quality, and grade when they are not, (3) advertising Defective Vehicles with the
15 intent not to sell them as advertised, (4) representing that a transaction involving
16 Defective Vehicles confers or involves rights, remedies, and obligations which it
17 does not, and (5) representing that the subject of a transaction involving Defective
18 Vehicles has been supplied in accordance with a previous representation when it has
19 not.
20
21

22 864. Toyota’s actions as set forth above occurred in the conduct of trade or
23 commerce.
24

25 865. Toyota’s actions affect the public interest because Plaintiffs were
26 injured in exactly the same way as millions of others purchasing and/or leasing
27 Toyota vehicles as a result of Toyota’s generalized course of deception. All of the
28

1 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
2 Toyota's business.

3 866. Plaintiffs and the Class suffered ascertainable loss as a result of
4 Defendant's conduct. Plaintiffs overpaid for their Defective Vehicles and did not
5 receive the benefit of their bargain, and their vehicles have suffered a diminution in
6 value.
7

8 867. Toyota's conduct proximately caused the injuries to Plaintiffs and the
9 Class.

10 868. . Toyota is liable to Plaintiffs and the Class for damages in
11 amounts to be proven at trial, including attorneys' fees, costs, and treble damages.
12 Plaintiffs further allege that Defendants are liable for punitive damages under the
13 CPPA as Defendants acted with a state of mind evincing malice or its equivalent.
14

15 **COUNT II**
16 **BREACH OF EXPRESS WARRANTY**
17 **(D.C. Code § 28:2-313)**

18 869. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 870. Toyota is and was at all relevant times a seller with respect to motor
21 vehicles.
22

23 871. In the course of selling its vehicles, Toyota expressly warranted in
24 writing that the Vehicles were covered by a Basic Warranty.

25 872. Toyota breached the express warranty to repair and adjust to correct
26 defects in materials and workmanship of any part supplied by Toyota. Toyota has
27
28

1 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles’
2 materials and workmanship defects.

3 873. In addition to this Basic Warranty, Toyota expressly warranted several
4 attributes, characteristics and qualities, as set forth above.

5
6 874. These warranties are only a sampling of the numerous warranties that
7 Toyota made relating to safety, reliability and operation, which are more fully
8 outlined in Section IV.A. of the MCC. Generally these express warranties promise
9 heightened, superior, and state-of-the-art safety, reliability, performance standards,
10 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
11 advertisements, in Toyota’s “e brochures,” and in uniform statements provided by
12 Toyota to be made by salespeople. These affirmations and promises were part of the
13 basis of the bargain between the parties.
14

15 875. These additional warranties were also breached because the Defective
16 Vehicles were not fully operational, safe, or reliable (and remained so even after the
17 problems were acknowledged and a recall “fix” was announced), nor did they
18 comply with the warranties expressly made to purchasers or lessees. Toyota did not
19 provide at the time of sale, and has not provided since then, vehicles conforming to
20 these express warranties.
21

22 876. Furthermore, the limited warranty of repair and/or adjustments to
23 defective parts, fails in its essential purpose because the contractual remedy is
24 insufficient to make the Plaintiffs and the Class whole and because the Defendants
25 have failed and/or have refused to adequately provide the promised remedies within
26 a reasonable time.
27
28

1 877. Accordingly, recovery by the Plaintiffs is not limited to the limited
2 warranty of repair or adjustments to parts defective in materials or workmanship, and
3 Plaintiffs seek all remedies as allowed by law.

4 878. Also, as alleged in more detail herein, at the time that Defendants
5 warranted and sold the vehicles they knew that the vehicles did not conform to the
6 warranties and were inherently defective, and Defendants wrongfully and
7 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
8 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
9 and/or fraudulent pretenses.
10

11 879. Moreover, many of the damages flowing from the Defective Vehicles
12 cannot be resolved through the limited remedy of “replacement or adjustments,” as
13 those incidental and consequential damages have already been suffered due to
14 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
15 continued failure to provide such limited remedy within a reasonable time, and any
16 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
17 Plaintiffs and the Class whole.
18

19 880. Finally, due to the Defendants’ breach of warranties as set forth herein,
20 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
21 in D.C. CODE § 28:2-608, for a revocation of acceptance of the goods, and for a return
22 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.
23

24 881. Toyota was provided notice of these issues by numerous complaints
25 filed against it, including the instant complaint, and by numerous individual letters
26 and communications sent by Plaintiffs and the Class before or within a reasonable
27
28

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 882. As a direct and proximate result of Toyota's breach of express
4 warranties, Plaintiffs and the Class have been damaged in an amount to be
5 determined at trial.
6

7 **COUNT III**
8 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
9 **(D.C. Code § 28:2-314)**

10 883. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 884. Toyota is and was at all relevant times a merchant with respect to motor
13 vehicles.

14 885. A warranty that the Defective Vehicles were in merchantable condition
15 is implied by law in the instant transactions.
16

17 886. These vehicles, when sold and at all times thereafter, were not in
18 merchantable condition and are not fit for the ordinary purpose for which cars are
19 used. Specifically, the Defective Vehicles are inherently defective in that there are
20 defects in the vehicle control systems that permit sudden unintended acceleration to
21 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
22 such SUA events, nor do they have a brake-override; and the ETCS system was not
23 adequately tested.
24

25 887. Toyota was provided notice of these issues by numerous complaints
26 filed against it, including the instant complaint, and by numerous individual letters
27 and communications sent by Plaintiffs and the Class before or within a reasonable
28

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 888. As a direct and proximate result of Toyota's breach of the warranties of
4 merchantability, Plaintiffs and the Class have been damaged in an amount to be
5 proven at trial.
6

7 **COUNT IV**

8 **UNJUST ENRICHMENT**

9 **(Based On District Of Columbia Law)**

10 889. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 890. Toyota had knowledge of the safety defects in its vehicles, which it
13 failed to disclose to Plaintiffs and the Class.

14 891. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
17 value and Toyota obtained monies which rightfully belong to Plaintiffs.
18

19 892. Toyota appreciated, accepted and retained the non-gratuitous benefits
20 conferred by Plaintiffs and other Class members, who without knowledge of the safety
21 defects paid a higher price for vehicles which actually had lower values. It would be
22 inequitable and unjust for Toyota to retain these wrongfully obtained profits.
23

24 893. Plaintiffs, therefore, are entitled to restitution and seek an order
25 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
26 interest.
27
28

COUNT V

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On D.C. Law)

894. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

895. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under the District of Columbia's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

896. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

897. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

FLORIDA

COUNT I

**VIOLATION OF FLORIDA'S UNFAIR &
DECEPTIVE TRADE PRACTICES ACT**

(Fla. Stat. § 501.201, *et seq.*)

898. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 899. This Count and all Counts asserted Florida law are associated on behalf
2 of plaintiffs and class members who experienced SUA.

3 900. The conduct of Toyota as set forth herein constitutes unfair or deceptive
4 acts or practices, including, but not limited to Toyota's manufacture and sale of
5 vehicles with a sudden acceleration defect that lack brake-override or other effective
6 fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and
7 remedy, and its misrepresentations and omissions regarding the safety and reliability
8 of its vehicles.
9

10 901. Toyota's actions as set forth above occurred in the conduct of trade or
11 commerce.
12

13 902. Toyota's actions impact the public interest because Plaintiffs were
14 injured in exactly the same way as millions of others purchasing and/or leasing
15 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
16 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
17 Toyota's business.
18

19 903. Plaintiffs and the Class were injured as a result of Defendants' conduct.
20 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
21 their bargain, and their vehicles have suffered a diminution in value.

22 904. Toyota's conduct proximately caused the injuries to Plaintiffs and the
23 Class.
24

25 905. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
26 proven at trial, including attorneys' fees, costs, and treble damages.

27 906. Pursuant to FLA. STAT. § 501.201, Plaintiffs will serve the Florida
28 Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.

COUNT II
BREACH OF EXPRESS WARRANTY
(Fla. Stat. § 672.313)

907. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

908. This Count is asserted on behalf of plaintiffs and class members who experience SUA and who presented their vehicle for repair.

909. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

910. In the course of selling its vehicles, Toyota expressly warranted in writing that the Vehicles were covered by a Basic Warranty.

911. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the Vehicles' materials and workmanship defects.

912. In addition to this Basic Warranty, Toyota expressly warranted several attributes, characteristics and qualities, as set forth above.

913. These warranties are only a sampling of the numerous warranties that Toyota made relating to safety, reliability and operation, which are more fully outlined in Section IV.A., *supra*. Generally these express warranties promise heightened, superior, and state-of-the-art safety, reliability, performance standards, and promote the benefits of ETCS. These warranties were made, *inter alia*, in advertisements, in Toyota's "e brochures," and in uniform statements provided by

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 914. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 915. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 916. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 917. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses.
26

27 918. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 D

8 919. Toyota was provided notice of these issues by numerous complaints
9 filed against it, including the instant complaint, and by numerous individual letters
10 and communications sent by Plaintiffs and the Class before or within a reasonable
11 amount of time after Toyota issued the recall and the allegations of vehicle defects
12 became public.
13

14 920. As a direct and proximate result of Toyota's breach of express
15 warranties, Plaintiffs and the Class have been damaged in an amount to be
16 determined at trial.
17

18 **COUNT III**
19 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
20 **(Based On Florida Law)**

21 921. Plaintiffs reallege and incorporate by reference all paragraphs as though
22 fully set forth herein. This Count is asserted on behalf of plaintiffs and class
23 members who experienced SUA and who presented their vehicle for repair.

24 922. To the extent Toyota's repair or adjust commitment is deemed not to be
25 a warranty under Florida's Commercial Code, Plaintiffs plead in the alternative
26 under common law warranty and contract law. Toyota limited the remedies
27 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
28

1 defects in materials or workmanship of any part supplied by Toyota, and/or
2 warranted the quality or nature of those services to Plaintiffs.

3 923. Toyota breached this warranty or contract obligation by failing to repair
4 the Defective Vehicles evidencing a sudden unintended acceleration problem,
5 including those that were recalled, or to replace them.
6

7 924. As a direct and proximate result of Defendants' breach of contract or
8 common law warranty, Plaintiffs and the Class have been damaged in an amount to
9 be proven at trial, which shall include, but is not limited to, all compensatory
10 damages, incidental and consequential damages, and other damages allowed by law.
11

12 **COUNT IV**
13 **FRAUD BY CONCEALMENT**
14 **(Based On Florida Law)**

15 925. Plaintiffs reallege and incorporate by reference all paragraphs as though
16 fully set forth herein on behalf of all plaintiffs and class members who suffered SUA.

17 926. Defendants had a duty to disclose the safety, quality and reliability
18 issues because they consistently marketed their vehicles as safe, reliable and of high
19 quality and proclaimed that safety is one of Toyota's highest corporate priorities.
20 Once Defendants made representations to the public about safety, reliability and
21 quality, Defendants were under a duty to disclose these omitted facts, because where
22 one does speak one must speak the whole truth and not conceal any facts which
23 materially qualify those facts stated. One who volunteers information must be
24 truthful, and the telling of a half-truth calculated to deceive is fraud.
25

26 927. In addition, Defendants had a duty to disclose these omitted material
27 facts because they were known and/or accessible only to Defendants who have
28

1 superior knowledge and access to the facts, and Defendants knew they were not
2 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
3 were material because they directly impact the safety, quality and reliability of the
4 Defective Vehicles. Whether or not a vehicle accelerates only at the driver's
5 command, and whether a vehicle will stop or not upon application of the brake by
6 the driver, are material safety, quality and reliability concerns. Defendants possessed
7 exclusive knowledge of the facts rendering Toyota Vehicles inherently more
8 dangerous and unreliable than similar vehicles.
9

10 928. Defendants actively concealed and/or suppressed these material facts, in
11 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
12 Defective Vehicles at a higher price for the vehicles, which did not match the
13 vehicles' true value.
14

15 929. Defendants still have not made full and adequate disclosure and
16 continue to defraud Plaintiffs and the Class.

17 930. Plaintiffs and the Class were unaware of these omitted material facts
18 and would not have acted as they did if they had known of the concealed and/or
19 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
20 in exclusive control of the material facts and such facts were not known to the public
21 or the Class.
22

23 931. As a result of the concealment and/or suppression of the facts, Plaintiffs
24 and the Class sustained damage. For those Plaintiffs and the Class who elect to
25 affirm the sale, these damages, include the difference between the actual value of
26 that which Plaintiffs and the Class paid and the actual value of that which they
27 received, together with additional damages arising from the sales transaction,
28

1 amounts expended in reliance upon the fraud, compensation for loss of use and
2 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
3 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
4 restitution and consequential damages.

5
6 932. Defendants' acts were done maliciously, oppressively, deliberately, with
7 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
8 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
9 punitive damages in an amount sufficient to deter such conduct in the future, which
10 amount is to be determined according to proof.

11 **GEORGIA**
12 **COUNT I**
13 **VIOLATION OF GEORGIA'S UNIFORM DECEPTIVE**
14 **TRADE PRACTICES ACT**
15 **(Ga. Code Ann. § 10-1-370, *et seq.*)**

16 933. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 934. The conduct of Toyota as set forth herein constitutes unfair or deceptive
19 acts or practices, including, but not limited to Toyota's manufacture and sale of
20 vehicles with a sudden acceleration defect that lack brake-override or other effective
21 fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and
22 remedy, and its misrepresentations and omissions regarding the safety and reliability
23 of its vehicles.
24

25 935. Toyota's actions as set forth above occurred in the conduct of trade or
26 commerce.
27

936. Toyota's actions impact the public interest because Plaintiffs were injured in exactly the same way as millions of others purchasing and/or leasing Toyota vehicles as a result of Toyota's generalized course of deception. All of the wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Toyota's business.

937. Plaintiffs and the Class were injured as a result of Defendant's conduct. Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of their bargain, and their vehicles have suffered a diminution in value.

938. Toyota's conduct proximately caused the injuries to Plaintiffs and the Class.

939. Toyota is liable to Plaintiffs and the Class for damages in amounts to be proven at trial, including attorneys' fees, costs, and treble damages.

940. Pursuant to GA. CODE ANN. § 10-1-370, Plaintiffs will serve the Georgia Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.

COUNT II

VIOLETION OF GEORGIA'S FAIR BUSINESS PRACTICES ACT

(Ga. Code Ann. § 10-1-390, *et seq.*)

941. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

942. The conduct of Toyota as set forth herein constitutes unfair or deceptive acts or practices, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and

1 remedy, and its misrepresentations and omissions regarding the safety and reliability
2 of its vehicles.

3 943. Toyota's actions as set forth above occurred in the conduct of trade or
4 commerce.

5 944. Toyota's actions impact the public interest because Plaintiffs were
6 injured in exactly the same way as millions of others purchasing and/or leasing
7 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
8 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
9 Toyota's business.
10

11 945. Plaintiffs and the Class were injured as a result of Defendant's conduct.
12 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
13 their bargain, and their vehicles have suffered a diminution in value.
14

15 946. Toyota's conduct proximately caused the injuries to Plaintiffs and the
16 Class.

17 947. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
18 proven at trial, including attorneys' fees, costs, and treble damages.
19

20 948. Pursuant to GA. CODE ANN. § 10-1-390, Plaintiffs will serve the Georgia
21 Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.

22 **COUNT III**

23 **BREACH OF EXPRESS WARRANTY**

24 **(Ga. Code Ann. § 11-2-313)**

25 949. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.
27
28

1 950. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles.

3 951. In the course of selling its vehicles, Toyota expressly warranted in
4 writing that the Vehicles were covered by a Basic Warranty.

5 952. Toyota breached the express warranty to repair and adjust to correct
6 defects in materials and workmanship of any part supplied by Toyota. Toyota has
7 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
8 materials and workmanship defects.

9
10 953. In addition to this Basic Warranty, Toyota expressly warranted several
11 attributes, characteristics and qualities, as set forth above.

12 954. These warranties are only a sampling of the numerous warranties that
13 Toyota made relating to safety, reliability and operation, which are more fully
14 outlined in Section IV.A., *supra*. Generally these express warranties promise
15 heightened, superior, and state-of-the-art safety, reliability, performance standards,
16 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
17 advertisements, in Toyota's "e brochures," and in uniform statements provided by
18 Toyota to be made by salespeople. These affirmations and promises were part of the
19 basis of the bargain between the parties.

20
21 955. These additional warranties were also breached because the Defective
22 Vehicles were not fully operational, safe, or reliable (and remained so even after the
23 problems were acknowledged and a recall "fix" was announced), nor did they
24 comply with the warranties expressly made to purchasers or lessees. Toyota did not
25 provide at the time of sale, and has not provided since then, vehicles conforming to
26 these express warranties.

1 956. Furthermore, the limited warranty of repair and/or adjustments to
2 defective parts, fails in its essential purpose because the contractual remedy is
3 insufficient to make the Plaintiffs and the Class whole and because the Defendants
4 have failed and/or have refused to adequately provide the promised remedies within
5 a reasonable time.
6

7 957. Accordingly, recovery by the Plaintiffs is not limited to the limited
8 warranty of repair or adjustments to parts defective in materials or workmanship, and
9 Plaintiffs seek all remedies as allowed by law.

10 958. Also, as alleged in more detail herein, at the time that Defendants
11 warranted and sold the vehicles they knew that the vehicles did not conform to the
12 warranties and were inherently defective, and Defendants wrongfully and
13 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
14 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
15 and/or fraudulent pretenses.
16

17 959. Moreover, many of the damages flowing from the Defective Vehicles
18 cannot be resolved through the limited remedy of “replacement or adjustments,” as
19 those incidental and consequential damages have already been suffered due to
20 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
21 continued failure to provide such limited remedy within a reasonable time, and any
22 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
23 Plaintiffs and the Class whole.
24

25 960. Finally, due to the Defendants’ breach of warranties as set forth herein,
26 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
27 in GA. CODE ANN. § 11-2-608, for a revocation of acceptance of the goods, and for a
28

1 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
2 owned.

3 961. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 962. As a direct and proximate result of Toyota's breach of express
10 warranties, Plaintiffs and the Class have been damaged in an amount to be
11 determined at trial.
12

13 **COUNT IV**
14 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
15 **(Ga. Code Ann. § 11-2-314)**

16 963. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 964. Toyota is and was at all relevant times a merchant with respect to motor
19 vehicles.

20 965. A warranty that the Defective Vehicles were in merchantable condition
21 is implied by law in the instant transactions, pursuant to GA. CODE ANN. § 11-2-314.
22

23 966. These vehicles, when sold and at all times thereafter, were not in
24 merchantable condition and are not fit for the ordinary purpose for which cars are
25 used. Specifically, the Defective Vehicles are inherently defective in that there are
26 defects in the vehicle control systems that permit sudden unintended acceleration to
27 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
28

1 such SUA events, nor do they have a brake-override; and the ETCS system was not
2 adequately tested.

3 967. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 968. Plaintiffs and the Class have had sufficient dealings with either the
10 Defendants or their agents (dealerships) to establish privity of contract between
11 Plaintiffs and the Class. Notwithstanding this, privity is not required in this case
12 because Plaintiffs and the Class are intended third-party beneficiaries of contracts
13 between Toyota and its dealers; specifically, they are the intended beneficiaries of
14 Toyota's implied warranties. The dealers were not intended to be the ultimate
15 consumers of the Defective Vehicles and have no rights under the warranty
16 agreements provided with the Defective Vehicles; the warranty agreements were
17 designed for and intended to benefit the ultimate consumers only. Finally, privity is
18 also not required because Plaintiffs' and Class members' Toyotas are dangerous
19 instrumentalities due to the aforementioned defects and nonconformities.
20
21

22 969. As a direct and proximate result of Toyota's breach of the warranties of
23 merchantability, Plaintiffs and the Class have been damaged in an amount to be
24 proven at trial.
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COUNT V
REVOCATION OF ACCEPTANCE
(Ga. Code Ann. § 11-2-608)

970. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

971. Plaintiffs identified above demanded revocation and the demands were refused.

972. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

973. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

974. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

975. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

976. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 977. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 978. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 979. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 980. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Plaintiff Class assert as an additional and/or alternative remedy, as
25 set forth in GA. CODE ANN. § 11-2-608, for a revocation of acceptance of the goods,
26 and for a return to Plaintiffs and to the Class of the purchase price of all vehicles
27 currently owned.
28

981. Consequently, Plaintiffs and the Class are entitled to revoke their acceptances, receive all payments made to Toyota, and to all incidental and consequential damages, including the costs associated with purchasing safer vehicles, and all other damages allowable under law, all in amounts to be proven at trial.

COUNT VI

BREACH OF CONTRACT/COMMON LAW WARRANTY

982. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

983. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Georgia's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

984. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

985. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VII
FRAUD BY CONCEALMENT
(Ga. Code Ann. § 51-6-2)

986. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

987. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety of their vehicles.

988. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

989. In addition, Defendants had a duty to disclose these omitted material facts because they were known and/or accessible only to Defendants who have superior knowledge and access to the facts, and Defendants knew they were not known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts were material because they directly impact the safety of the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's command, and whether a vehicle will stop or not upon application of the brake by the driver, are material safety concerns. Defendants possessed exclusive knowledge of the defects rendering Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

1 990. Defendants actively concealed and/or suppressed these material facts, in
2 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
3 Defective Vehicles at a higher price for the vehicles, which did not match the
4 vehicles' true value.

5 991. Defendants still have not made full and adequate disclosure and
6 continue to defraud Plaintiffs and the Class.
7

8 992. Plaintiffs and the Class were unaware of these omitted material facts
9 and would not have acted as they did if they had known of the concealed and/or
10 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
11 in exclusive control of the material facts and such facts were not known to the public
12 or the Class.
13

14 993. As a result of the concealment and/or suppression of the facts, Plaintiffs
15 and the Class sustained damage. For those Plaintiffs and the Class who elect to
16 affirm the sale, these damages, include the difference between the actual value of
17 that which Plaintiffs and the Class paid and the actual value of that which they
18 received, together with additional damages arising from the sales transaction,
19 amounts expended in reliance upon the fraud, compensation for loss of use and
20 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
21 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
22 restitution and consequential damages.
23

24 994. Defendants' acts were done maliciously, oppressively, deliberately, with
25 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
26 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
27
28

1 punitive damages in an amount sufficient to deter such conduct in the future, which
2 amount is to be determined according to proof.

3 **COUNT VIII**
4 **UNJUST ENRICHMENT**
5 **(Based On Georgia Law)**

6 995. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 996. Toyota had knowledge of the safety defects in its vehicles, which it
9 failed to disclose to Plaintiffs and the Class.

10 997. As a result of their wrongful and fraudulent acts and omissions, as set
11 forth above, pertaining to the design defect of their vehicles and the concealment of
12 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
13 value and Toyota obtained monies which rightfully belong to Plaintiffs.

14 998. Toyota appreciated, accepted and retained the non-gratuitous benefits
15 conferred by Plaintiffs and other Class members, who without knowledge of the safety
16 defects paid a higher price for vehicles which actually had lower values. It would be
17 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

18 999. Plaintiffs, therefore, are entitled to restitution and seek an order
19 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
20 interest.
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HAWAII
COUNT I
UNFAIR COMPETITION AND PRACTICES
(Haw. Rev. Stat. § 480, *et seq.*)

1000. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1001. Hawaii's Revised Statute § 480-2(a) prohibits "unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce...."

1002. Toyota's conduct as set forth herein constitutes unfair methods of competition and unfair or deceptive acts or practices in violation of HAW. REV. STAT. § 480-2, because Toyota's acts and practices, including the manufacture and sale of vehicles with a sudden acceleration defect that lack brake override or other effective fail-safe mechanism, and Toyota's failure to adequately investigate, disclose and remedy and Toyota's misrepresentations and omissions regarding the safety and reliability of its vehicles, offend established public policy, and because the harm they cause to consumers greatly outweighs any benefits associated with those practices. Toyota's conduct has also impaired competition within the automotive vehicles market and has prevented Plaintiffs from making fully informed decisions about whether to purchase or lease Defective Vehicles and/or the price to be paid to purchase or lease Defective Vehicles.

1003. Toyota's misrepresentations and omissions regarding the safety and reliability of its Defective Vehicles were material and caused Plaintiffs to purchase

1 or lease vehicles they would not have otherwise purchased or leased, or paid as much
2 for, had Plaintiffs known the vehicles were defective.

3 1004. Toyota's acts or practices as set forth above occurred in the conduct of
4 trade or commerce.

5 1005. Plaintiffs and the Class have suffered injury, including the loss of
6 money or property, as a result of Toyota's unfair methods of competition and unfair
7 or deceptive acts or practices.

8 1006. In addition to damages in amounts to be proven at trial, Plaintiffs and
9 the Class seek attorneys' fees, costs of suit and treble damages.

10 1007. Plaintiffs and the Class also seek injunctive relief to enjoin Toyota from
11 continuing its unfair competition and unfair or deceptive acts or practices.

12 **COUNT II**

13 **VIOLATION OF HAWAII'S UNIFORM DECEPTIVE 14 TRADE PRACTICE ACT**

15 **(Hawaii Rev. Stat. § 481A, *et seq.*)**

16 1008. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 1009. 2. Toyota participated in unfair or deceptive acts or practices that
19 violated the Uniform Deceptive Trade Practice Act ("UDAP"), HAW. REV. STAT.
20 § 481A, *et seq.*, as described herein.

21 1010. By failing to disclose and actively concealing the dangerous risk of
22 throttle control failure and the lack of adequate fail-safe mechanisms in Defective
23 Vehicles equipped with ETCS, Toyota engaged in deceptive business practices
24 prohibited by the UDAP, HAW. REV. STAT. § 481A, *et seq.*, including
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28

1 (1) representing that Defective Vehicles have characteristics, uses, benefits, and
2 qualities which they do not have, (2) representing that Defective Vehicles are of a
3 particular standard, quality, and grade when they are not and (3) advertising
4 Defective Vehicles with the intent not to sell them as advertised.
5

6 1011. As alleged above, Toyota made numerous material statements about the
7 safety and reliability of Defective Vehicles that were either false or misleading.
8 Each of these statements contributed to the deceptive context of Toyota's unlawful
9 advertising and representations as a whole.

10 1012. 5. Toyota knew that the ETCS in Defective Vehicles was
11 defectively designed or manufactured, would fail without warning, and was not
12 suitable for its intended use of regulating throttle position and vehicle speed based on
13 driver commands. Toyota nevertheless failed to warn Plaintiffs about these inherent
14 dangers despite having a duty to do so.
15

16 1013. Toyota owed Plaintiffs a duty to disclose the defective nature of
17 Defective Vehicles, including the dangerous risk of throttle control failure, the ETCS
18 defects, and the lack of adequate fail-safe mechanisms, because they:
19

20 a. Possessed exclusive knowledge of the defects rendering
21 Defective Vehicles inherently more dangerous and unreliable than similar vehicles;

22 b. Intentionally concealed the hazardous situation with Defective
23 Vehicles through their deceptive marketing campaign and recall program that they
24 designed to hide the life-threatening problems from Plaintiffs; and/or
25

26 c. Made incomplete representations about the safety and reliability of
27 Defective Vehicles generally, and ETCS in particular, while purposefully withholding
28 material facts from Plaintiffs that contradicted these representations.

1 1014. Defective Vehicles equipped with ETCS pose an unreasonable risk of
2 death or serious bodily injury to Plaintiffs, passengers, other motorists, pedestrians,
3 and the public at large, because they are susceptible to incidents of sudden
4 unintended acceleration.

5 1015. Whether or not a vehicle (a) accelerates only when commanded to do so
6 and (b) decelerates and stops when commanded to do so are facts that a reasonable
7 consumer would consider important in selecting a vehicle to purchase or lease.
8 When Plaintiffs bought a Toyota Vehicle for personal, family, or household
9 purposes, they reasonably expected the vehicle would (a) not accelerate unless
10 commanded to do so by application of the accelerator pedal or other driver controlled
11 means; (b) decelerate to a stop when the brake pedal was applied, and was equipped
12 with any necessary fail-safe mechanisms including a brake-override.
13
14

15 1016. Toyota's unfair or deceptive acts or practices were likely to and did in
16 fact deceive reasonable consumers, including Plaintiffs, about the true safety and
17 reliability of the Defective Vehicles.

18 1017. As a result of its violations of the UDAP detailed above, Toyota caused
19 actual damage to Plaintiffs and, if not stopped, will continue to harm Plaintiffs.
20 Plaintiffs currently own or lease, or within the class period have owned or leased,
21 Defective Vehicles that are defective and inherently unsafe. ETCS defects and the
22 resulting unintended acceleration incidents have caused the value of Defective
23 Vehicles to plummet.
24

25 1018. Plaintiffs risk irreparable injury as a result of Toyota's acts and
26 omissions in violation of the UDAP, and these violations present a continuing risk to
27 Plaintiffs as well as to the general public.
28

1 1019. Plaintiffs seek monetary damages and an order enjoining Defendants'
2 unfair or deceptive acts or practices, restitution, punitive damages, costs of Court,
3 attorney's fees and any other just and proper relief available under the UDAP.

4
5 **COUNT III**
6 **BREACH OF EXPRESS WARRANTY**
7 **(Hawaii Rev. Stat. § 490:2-313)**

8 1020. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1021. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles.

12 1022. In the course of selling its vehicles, Toyota expressly warranted in
13 writing that the Vehicles were covered by a Basic Warranty.

14 1023. Toyota breached the express warranty to repair and adjust to correct
15 defects in materials and workmanship of any part supplied by Toyota. Toyota has
16 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
17 materials and workmanship defects.

18 1024. In addition to this Basic Warranty, Toyota expressly warranted several
19 attributes, characteristics and qualities, as set forth above.

20 1025. These warranties are only a sampling of the numerous warranties that
21 Toyota made relating to safety, reliability and operation, which are more fully
22 outlined in Section IV.A., *supra*. Generally these express warranties promise
23 heightened, superior, and state-of-the-art safety, reliability, performance standards,
24 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
25 advertisements, in Toyota's "e brochures," and in uniform statements provided by
26
27
28

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 1026. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 1027. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 1028. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 1029. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses.
26

27 1030. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 1031. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in HAW. REV. STAT. § 490:2-608, for a revocation of acceptance of the goods, and
10 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
11 currently owned and for such other incidental and consequential damages as allowed
12 under Hawaii law.
13

14 1032. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 1033. As a direct and proximate result of Toyota's breach of express
21 warranties, Plaintiffs and the Class have been damaged in an amount to be
22 determined at trial.
23

24 **COUNT IV**
25 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
26 **(Haw. Rev. Stat. § 490:2-314)**

27 1034. Plaintiffs reallege and incorporate by reference all paragraphs as though
28 fully set forth herein.

1 1035. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles.

3 1036. A warranty that the Defective Vehicles were in merchantable condition
4 was implied by law in the instant transactions.
5

6 1037. These vehicles, when sold and at all times thereafter, were not in
7 merchantable condition and are not fit for the ordinary purpose for which cars are
8 used. Specifically, the Defective Vehicles are inherently defective in that there are
9 defects in the vehicle control systems that permit sudden unintended acceleration to
10 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
11 such SUA events, nor do they have a brake-override; and the ETCS system was not
12 adequately tested.
13

14 1038. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 1039. Privity is not required in this case because Plaintiffs and the Class are
21 intended third-party beneficiaries of contracts between Toyota and its dealers;
22 specifically, they are the intended beneficiaries of Toyota's implied warranties. The
23 dealers were not intended to be the ultimate consumers of the Defective Vehicles and
24 have no rights under the warranty agreements provided with the Defective Vehicles;
25 the warranty agreements were designed for and intended to benefit the ultimate
26 consumers only.
27
28

1 1040. As a direct and proximate result of Toyota's breach of the warranties of
2 merchantability, Plaintiffs and the Class have been damaged in an amount to be
3 proven at trial.

4
5 **COUNT V**
6 **REVOCATION OF ACCEPTANCE**
7 **(Haw. Rev. Stat. § 490:2-608)**

8 1041. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1042. Plaintiffs identified above demanded revocation and the demands were
11 refused.

12 1043. Plaintiffs and the Class had no knowledge of such defects and
13 nonconformities, were unaware of these defects, and reasonably could not have
14 discovered them when they purchased or leased their automobiles from Toyota. On
15 the other hand, Toyota was aware of the defects and nonconformities at the time of
16 sale and thereafter.

17
18 1044. Acceptance was reasonably induced by the difficulty of discovery of the
19 defects and nonconformities before acceptance.

20 1045. There has been no change in the condition of Plaintiffs' vehicles not
21 caused by the defects and nonconformities.

22
23 1046. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
24 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
25 paid.

26 1047. Plaintiffs and the Class would suffer economic hardship if they returned
27 their vehicles but did not receive the return of all payments made by them. Because
28

1 Toyota is refusing to acknowledge any revocation of acceptance and return
2 immediately any payments made, Plaintiffs and the Class have not re-accepted their
3 Defective Vehicles by retaining them.

4 1048. These defects and nonconformities substantially impaired the value of
5 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
6 basic sources. First, the Defective Vehicles fail in their essential purpose because
7 they present an unreasonably high risk of sudden unintended acceleration (a risk
8 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
9 Second, the repair and adjust warranty has failed of its essential purpose because
10 Toyota cannot repair or adjust the Defective Vehicles.

11 1049. Plaintiffs and the Class provided notice of their intent to seek revocation
12 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
13 (and many Class members) have requested that Toyota accept return of their vehicles
14 and return all payments made. Plaintiffs on behalf of themselves and the Class
15 hereby demand revocation and tender their Defective Vehicles.

16 1050. Plaintiffs and the Class would suffer economic hardship if they returned
17 their vehicles but did not receive the return of all payments made by them. Because
18 Toyota is refusing to acknowledge any revocation of acceptance and return
19 immediately any payments made, Plaintiffs and the Class have not re-accepted their
20 Defective Vehicles by retaining them, as they must continue using them due to the
21 financial burden of securing alternative means of transport for an uncertain and
22 substantial period of time.

23 1051. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25

1 in HAW. REV. STAT. § 490:2-608, for a revocation of acceptance of the goods, and
2 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
3 currently owned and for such other incidental and consequential damages as allowed
4 under HAW. REV. STAT. § 490:2-608.

5
6 1052. Consequently, Plaintiffs and the Class are entitled to revoke their
7 acceptances, receive all payments made to Toyota, and to all incidental and
8 consequential damages, including the costs associated with purchasing safer vehicles,
9 and all other damages allowable under law, all in amounts to be proven at trial.

10
11 **COUNT VI**
12 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
13 **(Based On Hawaii Law)**

14 1053. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein.

16 1054. To the extent Toyota's repair or adjust commitment is deemed not to be
17 a warranty under Hawaii's Commercial Code, Plaintiffs plead in the alternative
18 under common law warranty and contract law. Toyota limited the remedies
19 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
20 defects in materials or workmanship of any part supplied by Toyota, and/or
21 warranted the quality or nature of those services to Plaintiffs.

22
23 1055. 3. Toyota breached this warranty or contract obligation by failing to
24 repair the Defective Vehicles evidencing a sudden unintended acceleration problem,
25 including those that were recalled, or to replace them.

26 1056. As a direct and proximate result of Defendants' breach of contract or
27 common law warranty, Plaintiffs and the Class have been damaged in an amount to
28

1 be proven at trial, which shall include, but is not limited to, all compensatory
2 damages, incidental and consequential damages, and other damages allowed by law.

3 **COUNT VII**
4 **UNJUST ENRICHMENT**
5 **(Based On Hawaii Law)**

6 1057. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 1058. As a result of their wrongful and fraudulent acts and omissions, as set
9 forth above, pertaining to the design defect of their vehicles and the concealment of
10 the defect, Defendants charged a higher price for their vehicles than the vehicles'
11 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

12 1059. Defendants enjoyed the benefit of increased financial gains, to the
13 detriment of Plaintiffs and other Class members, who paid a higher price for vehicles
14 which actually had lower values. It would be inequitable and unjust for Defendants
15 to retain these wrongfully obtained profits.

16 1060. Plaintiffs, therefore, seek an order establishing Defendants as
17 constructive trustees of the profits unjustly obtained, plus interest.

18 **IDAHO**
19 **COUNT I**
20 **VIOLATIONS OF THE IDAHO CONSUMER PROTECTION ACT**
21 **(Idaho Civ. Code § 48-601, et seq.)**

22 1061. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 1062. Defendants are "persons" under IDAHO CIVIL CODE § 48-602(1).

1 1063. Plaintiffs are “consumers” who purchased or leased one or more
2 Defective Vehicles.

3 1064. Defendants both participated in misleading, false, or deceptive acts that
4 violated the Idaho Consumer Protection Act (“ICPA”), IDAHO CIV. CODE § 48-601,
5 *et seq.*, as described above and below. Defendants each are directly liable for these
6 violations of law. TMC also is liable for TMS’s violations of the ICPA because
7 TMS acts as TMC’s general agent in the United States for purposes of sales and
8 marketing.
9

10 1065. By failing to disclose and actively concealing the dangerous risk of
11 throttle control failure and the lack of adequate fail-safe mechanisms in Defective
12 Vehicles equipped with ETCS, Defendants engaged in deceptive business practices
13 prohibited by the ICPA, including (1) representing that Defective Vehicles have
14 characteristics, uses, and benefits which they do not have, (2) representing that
15 Defective Vehicles are of a particular standard, quality, and grade when they are not,
16 (3) advertising Defective Vehicles with the intent not to sell them as advertised, and
17 (4) engaging in acts or practices which are otherwise misleading, false, or deceptive
18 to the consumer.
19
20

21 1066. As alleged above, Defendants made numerous material statements about
22 the safety and reliability of Defective Vehicles that were either false or misleading.
23 Each of these statements contributed to the deceptive context of TMC’s and TMS’s
24 unlawful advertising and representations as a whole.
25

26 1067. Defendants knew that the ETCS in Defective Vehicles was defectively
27 designed or manufactured, would fail without warning, and was not suitable for its
28 intended use of regulating throttle position and vehicle speed based on driver

1 commands. Defendants nevertheless failed to warn Plaintiffs about these inherent
2 dangers despite having a duty to do so.

3 1068. Defendants each owed Plaintiffs a duty to disclose the defective nature
4 of Defective Vehicles, including the dangerous risk of throttle control failure, the
5 ETCS defects, and the lack of adequate fail-safe mechanisms, because they:

6
7 a. Possessed exclusive knowledge of the defects rendering
8 Defective Vehicles inherently more dangerous and unreliable than similar vehicles;

9 b. Intentionally concealed the hazardous situation with Defective
10 Vehicles through their deceptive marketing campaign and recall program that they
11 designed to hide the life-threatening problems from Plaintiffs; and/or

12 c. Made incomplete representations about the safety and reliability
13 of Defective Vehicles generally, and ETCS in particular, while purposefully
14 withholding material facts from Plaintiffs that contradicted these representations.
15

16 1069. Defective Vehicles equipped with ETCS pose an unreasonable risk of
17 death or serious bodily injury to Plaintiffs, passengers, other motorists, pedestrians,
18 and the public at large, because they are susceptible to incidents of sudden
19 unintended acceleration.
20

21 1070. Whether or not a vehicle (a) accelerates only when commanded to do so
22 and (b) decelerates and stops when commanded to do so are facts that a reasonable
23 consumer would consider important in selecting a vehicle to purchase or lease.
24 When Plaintiffs bought a Toyota Vehicle for personal, family, or household
25 purposes, they reasonably expected the vehicle would (a) not accelerate unless
26 commanded to do so by application of the accelerator pedal or other driver-
27
28

1 controlled means; (b) decelerate to a stop when the brake pedal was applied, and was
2 equipped with any necessary fail-safe mechanisms including a brake-override.

3 1071. TMC's and TMS's misleading, false, or deceptive acts or practices were
4 likely to and did in fact deceive reasonable consumers, including Plaintiffs, about the
5 true safety and reliability of Defective Vehicles.
6

7 1072. As a result of its violations of the ICPA detailed above, Defendants
8 caused actual damage to Plaintiffs and, if not stopped, will continue to harm
9 Plaintiffs. Plaintiffs currently own or lease, or within the class period have owned or
10 leased, Defective Vehicles that are defective and inherently unsafe. ETCS defects
11 and the resulting unintended acceleration incidents have caused the value of
12 Defective Vehicles to plummet.
13

14 1073. Plaintiffs risk irreparable injury as a result of TMC's and TMS's acts
15 and omissions in violation of the ICPA, and these violations present a continuing risk
16 to Plaintiffs as well as to the general public.

17 1074. Plaintiffs also seek punitive damages against Defendants because each
18 carried out despicable conduct with willful and conscious disregard of the rights and
19 safety of others, subjecting Plaintiffs to cruel and unjust hardship as a result.
20 Defendants intentionally and willfully misrepresented the safety and reliability of
21 Defective Vehicles, deceived Plaintiffs on life-or-death matters, and concealed
22 material facts that only it knew, all to avoid the expense and public relations
23 nightmare of correcting a deadly flaw in the Defective Vehicles it repeatedly
24 promised Plaintiffs were safe. Defendants' unlawful conduct constitutes malice,
25 oppression, and fraud warranting punitive damages.
26
27
28

1 1075. The recalls and repairs instituted by Toyota have not been adequate.
2 Defective Vehicles still are defective and the “confidence” booster offer of an
3 override is not an effective remedy and is not offered to all Defective Vehicles,
4 including the 2002-2007 Camry.

5 1076. Plaintiffs further seek an order enjoining Defendants’ unfair or
6 deceptive acts or practices, restitution, punitive damages, costs of Court, attorney’s
7 fees under IDAHO CIVIL CODE § 48-608, and any other just and proper relief available
8 under the ICPA.
9

10 **COUNT II**
11 **BREACH OF EXPRESS WARRANTY**
12 **(Idaho Com. Code § 28-2-313)**

13 1077. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 1078. Toyota is and was at all relevant times a merchant with respect to motor
17 vehicles under IDAHO COM. CODE § 28-2-104.

18 1079. Toyota dealerships who sold Defective Vehicles to Plaintiffs and the
19 Class acted as the agents of TMS and/or TMC. Plaintiffs and the Class therefore
20 were in a relationship of privity with Defendants, to the extent such a relationship is
21 required by IDAHO COM. CODE § 28-2-313.
22

23 1080. In the course of selling its vehicles, Toyota expressly warranted in
24 writing that the Vehicles were covered by a Basic Warranty.

25 1081. Toyota breached the express warranty to repair and adjust to correct
26 defects in materials and workmanship of any part supplied by Toyota. Toyota has
27
28

1 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles’
2 materials and workmanship defects.

3 1082. In addition to this Basic Warranty, Toyota expressly warranted several
4 attributes, characteristics and qualities, as set forth above.

5
6 1083. These warranties are only a sampling of the numerous warranties that
7 Toyota made relating to safety, reliability and operation, which are more fully
8 outlined in Section IV.A., *supra*. Generally these express warranties promise
9 heightened, superior, and state-of-the-art safety, reliability, performance standards,
10 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
11 advertisements, in Toyota’s “e-brochures,” and in uniform statements provided by
12 Toyota to be made by salespeople. These affirmations and promises were part of the
13 basis of the bargain between the parties.
14

15 1084. These additional warranties were also breached because the Defective
16 Vehicles were not fully operational, safe, or reliable (and remained so even after the
17 problems were acknowledged and a recall “fix” was announced), nor did they
18 comply with the warranties expressly made to purchasers or lessees. Toyota did not
19 provide at the time of sale, and has not provided since then, vehicles conforming to
20 these express warranties.
21

22 1085. Furthermore, the limited warranty of repair and/or adjustments to
23 defective parts, fails in its essential purpose because the contractual remedy is
24 insufficient to make the Plaintiffs and the Class whole and because the Defendants
25 have failed and/or have refused to adequately provide the promised remedies within
26 a reasonable time.
27
28

1 1086. Accordingly, recovery by the Plaintiffs is not limited to the limited
2 warranty of repair or adjustments to parts defective in materials or workmanship, and
3 Plaintiffs seek all remedies as allowed by law.

4 1087. Also, as alleged in more detail herein, at the time that Defendants
5 warranted and sold the vehicles they knew that the vehicles did not conform to the
6 warranties and were inherently defective, and Defendants wrongfully and
7 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
8 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
9 and/or fraudulent pretenses. The enforcement under these circumstances of any
10 limitations whatsoever precluding the recovery of incidental and/or consequential
11 damages is unenforceable pursuant to IDAHO COM. CODE § 28-2-302(1).
12

13 1088. Moreover, many of the damages flowing from the Defective Vehicles
14 cannot be resolved through the limited remedy of “replacement or adjustments,” as
15 those incidental and consequential damages have already been suffered due to
16 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
17 continued failure to provide such limited remedy within a reasonable time, and any
18 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
19 Plaintiffs and the Class whole.
20

21 1089. Toyota was provided notice of these issues by numerous complaints
22 filed against it, including the instant complaint, and by numerous individual letters
23 and communications sent by Plaintiffs and the Class before or within a reasonable
24 amount of time after Toyota issued the recall and the allegations of vehicle defects
25 became public.
26
27
28

1 1090. As a direct and proximate result of Toyota's breach of express
2 warranties, Plaintiffs and the Class have been damaged in an amount to be
3 determined at trial.

4
5 **COUNT III**
6 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
7 **(Idaho Com. Code § 28-2-314)**

8 1091. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1092. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles under IDAHO COM. CODE § 28-2-104.

12 1093. A warranty that the Defective Vehicles were in merchantable condition
13 was implied by law in the instant transaction, pursuant to IDAHO COM. CODE § 28-2-
14 314.

15
16 1094. These vehicles, when sold and at all times thereafter, were not in
17 merchantable condition and are not fit for the ordinary purpose for which cars are
18 used. Specifically, the Defective Vehicles are inherently defective in that there are
19 defects in the vehicle control systems that permit sudden unintended acceleration to
20 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
21 such SUA events, nor do they have a brake-override; and the ETCS system was not
22 adequately tested.

23
24 1095. Toyota was provided notice of these issues by numerous complaints
25 filed against it, including the instant complaint, and by numerous individual letters
26 and communications sent by Plaintiffs and the Class before or within a reasonable
27
28

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 1096. Plaintiffs and the Class have had sufficient direct dealings with either
4 the Defendants or their agents (dealerships) to establish privity of contract between
5 Plaintiffs and the Class. Notwithstanding this, privity is not required in this case
6 because Plaintiffs and the Class are intended third-party beneficiaries of contracts
7 between Toyota and its dealers; specifically, they are the intended beneficiaries of
8 Toyota's implied warranties. The dealers were not intended to be the ultimate
9 consumers of the Defective Vehicles and have no rights under the warranty
10 agreements provided with the Defective Vehicles; the warranty agreements were
11 designed for and intended to benefit the ultimate consumers only.
12
13

14 1097. As a direct and proximate result of Toyota's breach of the warranties of
15 merchantability, Plaintiffs and the Class have been damaged in an amount to be
16 proven at trial.

17 **COUNT IV**
18 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
19 **(Under Idaho Law)**

20 1098. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.
22

23 1099. To the extent Toyota's repair or adjust commitment is deemed not to be
24 a warranty under Idaho's Commercial Code, Plaintiffs plead in the alternative under
25 common law warranty and contract law. Toyota limited the remedies available to
26 Plaintiffs and the Class to just repairs and adjustments needed to correct defects in
27
28

1 materials or workmanship of any part supplied by Toyota, and/or warranted the
2 quality or nature of those services to Plaintiffs.

3 1100. Toyota breached this warranty or contract obligation by failing to repair
4 the Defective Vehicles evidencing a sudden unintended acceleration problem,
5 including those that were recalled, or to replace them.
6

7 1101. As a direct and proximate result of Defendants' breach of contract or
8 common law warranty, Plaintiffs and the Class have been damaged in an amount to
9 be proven at trial, which shall include, but is not limited to, all compensatory
10 damages, incidental and consequential damages, and other damages allowed by law.
11

12 **COUNT V**
13 **FRAUD BY CONCEALMENT**
14 **(Based On Idaho Law)**

15 1102. Plaintiffs reallege and incorporate by reference all paragraphs as though
16 fully set forth herein.

17 1103. As set forth above, Defendants concealed and/or suppressed material
18 facts concerning the safety of their vehicles.

19 1104. Defendants had a duty to disclose these safety issues because they
20 consistently marketed their vehicles as safe and proclaimed that safety is one of
21 Toyota's highest corporate priorities. Once Defendants made representations to the
22 public about safety, Defendants were under a duty to disclose these omitted facts,
23 because where one does speak one must speak the whole truth and not conceal any
24 facts which materially qualify those facts stated. One who volunteers information
25 must be truthful, and the telling of a half-truth calculated to deceive is fraud.
26
27
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1 1105. In addition, Defendants had a duty to disclose these omitted material
2 facts because they were known and/or accessible only to Defendants who have
3 superior knowledge and access to the facts, and Defendants knew they were not
4 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
5 were material because they directly impact the safety of the Defective Vehicles.
6 Whether or not a vehicle accelerates only at the driver's command, and whether a
7 vehicle will stop or not upon application of the brake by the driver, are material
8 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
9 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
10

11 1106. Defendants actively concealed and/or suppressed these material facts, in
12 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
13 Defective Vehicles at a higher price for the vehicles, which did not match the
14 vehicles' true value.
15

16 1107. Defendants still have not made full and adequate disclosure and
17 continue to defraud Plaintiffs and the Class.
18

19 1108. Plaintiffs and the Class were unaware of these omitted material facts
20 and would not have acted as they did if they had known of the concealed and/or
21 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
22 in exclusive control of the material facts and such facts were not known to the public
23 or the Class.
24

25 1109. As a result of the concealment and/or suppression of the facts, Plaintiffs
26 and the Class sustained damage.
27

28 1110. Defendants' acts were done maliciously, oppressively, deliberately, with
intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and

1 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
2 punitive damages in an amount sufficient to deter such conduct in the future, which
3 amount is to be determined according to proof.

4 **COUNT VI**
5 **UNJUST ENRICHMENT**
6 **(Based On Idaho Law)**

7
8 1111. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1112. As a result of their wrongful and fraudulent acts and omissions, as set
11 forth above, pertaining to the design defect of their vehicles and the concealment of
12 the defect, Defendants charged a higher price for their vehicles than the vehicles'
13 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

14 1113. Defendants enjoyed the benefit of increased financial gains, to the
15 detriment of Plaintiffs and other Class members, who paid a higher price for vehicles
16 which actually had lower values. It would be inequitable and unjust for Defendants
17 to retain these wrongfully obtained profits.

18
19 1114. Plaintiffs, therefore, seek an order establishing Defendants as
20 constructive trustees of the profits unjustly obtained, plus interest.
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1 ILLINOIS

2 COUNT I

3 VIOLATION OF ILLINOIS CONSUMER FRAUD AND
4 DECEPTIVE BUSINESS PRACTICES ACT

5 (815 Ill. Comp. Stat. 505/1, *et seq.*
6 and 720 Ill. Comp. Stat. 295/1A)

7 1115. Plaintiffs reallege and incorporate by reference all paragraphs as though
8 fully set forth herein.

9 1116. The Illinois Consumer Fraud and Deceptive Business Practices Act, 815
10 ILL. COMP. STAT. 505/2 prohibits unfair or deceptive acts or practices in connection
11 with any trade or commerce. Specifically, the Act prohibits suppliers from
12 representing that their goods are of a particular quality or grade they are not.

13 1117. Defendants are “persons” as that term is defined in the Illinois
14 Consumer Fraud and Deceptive Practices Act, 815 ILL. COMP. STAT. 505/1(c).

15 1118. Plaintiffs are “consumers” as that term is defined in the Illinois
16 Consumer Fraud and Deceptive Practices Act, 815 ILL. COMP. STAT. 505/1(e).

17 1119. Defendants’ conduct caused Plaintiffs’ damages as alleged.

18 1120. As a result of the foregoing wrongful conduct of Defendants, Plaintiffs
19 and the Class have been damaged in an amount to be proven at trial, including, but
20 not limited to, actual damages, court costs, and reasonable attorneys’ fees pursuant to
21 815 ILL. COMP. STAT. 505/1, *et seq.*
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COUNT II

VIOLATION OF THE ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT

**(815 Ill. Comp. Stat. 510/1, *et. seq.* and
720 Ill. Comp. Stat. 295/1A)**

1121. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1122. 815 ILL. COMP. STAT. 510/2 provides that a “person engages in a deceptive trade practice when, in the course of his or her business, vocation, or occupation,” the person does any of the following: “(2) causes likelihood of confusion or of misunderstanding as to the source, sponsorship, approval, or certification of goods or services; ... (5) represents that goods or services have sponsorship, approval, characteristics ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that he or she does not have; ... (7) represents that goods or services are of a particular standard, quality, or grade or that goods are a particular style or model, if they are of another; ... (9) advertises goods or services with intent not to sell them as advertised; ... [and] (12) engages in any other conduct which similarly creates a likelihood of confusion or misunderstanding.”

1123. Defendants are “persons” within the meaning of 815 ILL. COMP. STAT. 510/1(5).

1124. The vehicles sold to Plaintiffs were not of the particular sponsorship, approval, characteristics, ingredients, uses benefits, or qualities represented by Defendants.

1 1125. The vehicles sold to Plaintiffs were not of the particular standard,
2 quality, and/or grade represented by Defendants.

3 1126. Defendants conduct was knowing and/or intentional and/or with malice
4 and/or demonstrated a complete lack of care and/or reckless and/or was in conscious
5 disregard for the rights of Plaintiffs.
6

7 1127. As a result of the foregoing wrongful conduct of Defendants, Plaintiffs
8 have been damaged in an amount to proven at trial, including, but not limited to,
9 actual and punitive damages, equitable relief and reasonable attorneys' fees.

10 **COUNT III**
11 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
12 **(810 Ill. Comp. Stat. 5/2-314**
13 **and 810 Ill. Comp. Stat. 5/2A-212)**

14 1128. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein.

16 1129. Defendants impliedly warranted that their vehicles were of good and
17 merchantable quality and fit, and safe for their ordinary intended use – transporting
18 the driver and passengers in reasonable safety during normal operation, and without
19 unduly endangering them or members of the public.
20

21 1130. Defendants breached the implied warranty that the vehicle was
22 merchantable and safe for use as public transportation by marketing, advertising,
23 distributing and selling vehicles with the common design and manufacturing defect,
24 without incorporating adequate electronic or mechanical fail-safes, and while
25 misrepresenting the dangers of such vehicles to the public.
26
27
28

1 1131. These dangerous defects existed at the time the vehicles left
2 Defendants' manufacturing facilities and at the time they were sold to the Plaintiffs.

3 1132. These dangerous defects were the direct and proximate cause of
4 damages to the Plaintiffs.

5
6 **COUNT IV**
7 **BREACH OF EXPRESS WARRANTIES**
8 **(810 Ill. Comp. Stat. 5/2-313)**

9 1133. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 1134. Defendants expressly warranted – through statements and
12 advertisements – that the vehicles were of high quality, and at a minimum, would
13 actually work properly and safely.

14 1135. Defendants breached this warranty by knowingly selling to Plaintiffs
15 vehicles with dangerous defects, and which were not of high quality.

16 1136. Plaintiffs have been damaged as a direct and proximate result of the
17 breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were
18 and are worth far less than what the Plaintiffs paid to purchase, which was
19 reasonably foreseeable to Defendants.

20
21 **COUNT V**
22 **NEGLIGENCE**
23 **(Based On Illinois Law)**

24 1137. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 1138. Toyota is a manufacturer and supplier of automobiles.

1 1139. Defendants owed Plaintiffs a non-delegable duty to exercise ordinary
2 and reasonable care to properly design, engineer, and manufacture the vehicles
3 against foreseeable hazard and malfunctions including uncontrollable acceleration
4 and lack of proper fail-safe mechanisms.

5 1140. Defendants owed Plaintiffs a non-delegable duty to exercise ordinary
6 and reasonable care in designing, engineering, and manufacturing the vehicles so that
7 they would function normally, including that they would not accelerate out of control
8 and lack of proper fail-safe mechanisms.

9 1141. Defendants also owed – and owe – a continuing duty to notify Plaintiffs
10 of the problem at issue and to repair the dangerous defects.

11 1142. Defendants breached these duties of reasonable care by designing,
12 engineering and manufacturing vehicles that accelerated out of control without
13 proper fail-safe mechanisms, and breached their continuing duty to notify Plaintiffs
14 of these defects.

15 1143. The foreseeable hazards and malfunctions included, but are not limited
16 to, the sudden and unanticipated and uncontrollable acceleration of these vehicles
17 and lack of proper fail-safe mechanisms.

18 1144. Plaintiffs did not and could not know of the intricacies of these defects
19 and their latent and dangerous manifestations, or the likelihood of harm there from
20 arising in the normal use of their vehicles.

21 1145. At all relevant times, there existed alternative designs and engineering
22 which were both technically and economically feasible. Further, any alleged benefits
23 associated with the defective designs are vastly outweighed by the real risks
24 associated with sudden and uncontrollable acceleration.

1 1146. The vehicles were defective as herein alleged at the time they left
2 Defendants' factories, and the vehicles reached Plaintiffs without substantial change
3 in the condition in which they were sold.

4 1147. As a direct and proximate result of Defendants' breaches, Plaintiffs
5 have suffered damages, including, but not limited to, diminution in value, return of
6 lease payments and penalties, and injunctive relief related to future lease payments or
7 penalties.
8

9 **COUNT VI**
10 **STRICT PRODUCT LIABILITY (DEFECTIVE DESIGN)**
11 **(Based On Illinois Law)**

12 1148. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 1149. Defendants are and have been at all times pertinent to this Complaint,
15 engaged in the business of designing, manufacturing, assembling, promoting,
16 advertising, distributing and selling Defective Vehicles in the United States,
17 including those owned or leased by the Plaintiffs and the Class.
18

19 1150. Defendants knew and anticipated that the vehicles owned or leased by
20 Plaintiffs and the Class would be sold to and operated by purchasers and/or eventual
21 owners or lessors of Defendants' vehicles, including Plaintiffs and the Class.
22 Defendants also knew that these Defective Vehicles would reach the Plaintiffs and
23 the Class without substantial change in their condition from the time the vehicles
24 departed the Defendants' assembly lines.
25
26
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28

1 1151. Defendants designed the Defective Vehicles defectively, causing them
2 to fail to perform as safely as an ordinary consumer would expect when used in an
3 intended and reasonably foreseeable manner.

4 1152. Defendants had the capability to use a feasible, alternative, safer design,
5 and failed to correct the design defects.

6 1153. The risks inherent in the design of Defective Vehicles outweigh
7 significantly any benefits of such design.

8 1154. Plaintiffs and the Class could not have anticipated and did not know of
9 the aforementioned defects at any time prior to recent revelations regarding the
10 problems of the Defective Vehicles.

11 1155. As a direct and proximate result of Defendants' wrongful conduct,
12 Plaintiffs have suffered damages, including, but not limited to, diminution in value,
13 return of lease payments and penalties, and injunctive relief related to future lease
14 payments or penalties.

15 1156. Plaintiffs and the Class have sustained and will continue to sustain
16 economic losses and other damages for which they are entitled to compensatory and
17 equitable damages and declaratory relief in an amount to be proven at trial.

18 **COUNT VII**

19 **STRICT PRODUCT LIABILITY (FAILURE TO WARN)**

20 **(Based on Illinois Law)**

21 1157. Plaintiffs reallege and incorporate by reference all paragraphs as though
22 fully set forth herein.

23 1158. Defendants are and have been at all times pertinent to this Complaint,
24 engaged in the business of designing, manufacturing, assembling, promoting,
25

1 advertising, distributing and selling Defective Vehicles in the United States,
2 including those owned or leased by the Plaintiffs and the Class.

3 1159. Defendants, at all times pertinent to this Complaint, knew and
4 anticipated that the Defective Vehicles and their component parts would be
5 purchased, leased and operated by consumers, including Plaintiffs and the Class.
6

7 1160. Defendants also knew that these Defective Vehicles would reach the
8 Plaintiffs and the Class without substantial change in their conditions from the time
9 that the vehicles departed the Defendants' assembly lines.

10 1161. Defendants knew or should have known of the substantial dangers
11 involved in the reasonably foreseeable use of the Defective Vehicles, defective
12 design, manufacturing and lack of sufficient warnings which caused them to have an
13 unreasonably dangerous propensity to sudden and unintended acceleration.
14

15 1162. Defendants failed to adequately warn Plaintiffs and the Class when they
16 became aware of the defect that caused Plaintiffs and the Class' vehicles to be prone
17 to sudden and unintended acceleration.

18 1163. Defendants also failed to timely recall the vehicles or take any action to
19 timely warn Plaintiffs or the Class of these problems and instead continue to subject
20 Plaintiffs and the Class to harm.
21

22 1164. Defendants knew, or should have known, that these defects were not
23 readily recognizable to an ordinary consumer and that consumers would lease,
24 purchase and use these products without inspection.

25 1165. Defendants should have reasonably foreseen that the sudden and
26 unintended defect in the Defective Vehicles would subject the Plaintiffs and the
27 Class to harm resulting from the defect.
28

1 1166. Plaintiffs and the Class have used the Defective Vehicles for their
2 intended purpose and in a reasonable and foreseeable manner.

3 1167. As a direct and proximate result of Defendants' wrongful conduct,
4 Plaintiffs and the Class have sustained and will continue to sustain economic losses
5 and other damages for which they are entitled to compensatory and equitable
6 damages and declaratory relief in an amount to be proven at trial.
7

8 **COUNT VIII**
9 **UNJUST ENRICHMENT**
10 **(Based On Illinois Law)**

11 1168. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1169. Plaintiffs paid Toyota the value of vehicles that are non-defective, and
14 in exchange, Toyota provided Plaintiffs vehicles that are, in fact, defective.
15

16 1170. Further, Plaintiffs paid Toyota the value for vehicles that would not be
17 compromised by substantial, invasive repairs, and in return received vehicles that
18 require such repairs.

19 1171. Further, Plaintiffs paid Toyota for vehicles they could operate, and in
20 exchange, Toyota provided Plaintiffs vehicles that could not be normally operated
21 because their defects posed the possibility of life-threatening injuries or death.
22

23 1172. As such, Plaintiffs conferred a windfall upon Toyota, which knows of
24 the windfall and has retained such benefits, which would be unjust for Toyota to
25 retain.

26 1173. As a direct and proximate result of Toyota's unjust enrichment,
27 Plaintiffs have suffered and continue to suffer various damages, including, but not
28

1 limited to, restitution of all amounts by which Defendants were enriched through
2 their misconduct.

3
4 **COUNT IX**
5 **FRAUDULENT CONCEALMENT / FRAUD BY OMISSION**
6 **(Based On Illinois Law)**

7 1174. Plaintiffs reallege and incorporate by reference all paragraphs as though
8 fully set forth herein.

9 1175. Toyota intentionally concealed the above-described material safety
10 information, or acted with reckless disregard for the truth, and denied Plaintiffs and
11 the Class information that is highly relevant to their purchasing decision.

12 1176. Defendants further affirmatively misrepresented to Plaintiffs in
13 advertising and other forms of communication, including standard and uniform
14 material provided with each car that the vehicles they were selling were new, had no
15 significant defects and would perform and operate properly when driven in normal
16 usage.

17
18 1177. Defendants knew these representations were false when made.

19 1178. The vehicles purchased or leased by Plaintiffs were, in fact, defective,
20 unsafe, and unreliable, because the vehicles were subject to sudden, extreme
21 acceleration without adequate fail-safe mechanisms.

22
23 1179. Toyota had a duty to disclose that these vehicles were defective, unsafe
24 and unreliable in that the vehicles were subject to sudden, extreme acceleration
25 without fail-safe mechanisms because Plaintiffs relied on Toyota's material
26 representations that the vehicles they were purchasing were safe and free from
27 defects.

1 1180. The aforementioned concealment was material because if it had been
2 disclosed Plaintiffs would not have bought or leased the vehicles.

3 1181. The aforementioned representations were material because they were
4 facts that would typically be relied on by a person purchasing or leasing a new motor
5 vehicle. Toyota knew or recklessly disregarded that its representations were false
6 because it knew that people had died in its vehicles' unintended acceleration between
7 2002 and 2009. Toyota intentionally made the false statements in order to sell
8 vehicles.
9

10 1182. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
11 disclose the acceleration problems and Toyota's affirmative assurance that its
12 vehicles were safe and reliable and other similar false statements – in purchasing or
13 leasing Toyota's vehicles.
14

15 1183. As a result of their reliance, Plaintiffs have been injured in an amount to
16 be proven at trial, including, but not limited to, their lost benefit of the bargain and
17 overpayment at the time of purchase and/or the diminished value of their vehicles.
18

19 1184. Defendants' conduct was knowing, intentional, with malice,
20 demonstrated a complete lack of care, and was in reckless disregard for the rights of
21 Plaintiffs. Plaintiffs are therefore entitled to an award of punitive damages.

22 **COUNT X**

23 **BREACH OF LEASE / CONTRACT**

24 **(Based On Illinois Law)**

25 1185. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.
27
28

1 1186. Plaintiffs and the Class entered into lease agreements with Toyota.
2 Plaintiffs and the Class entered into agreements to purchase Toyota vehicles which
3 also directly or indirectly benefited Defendants.

4 1187. The leases and purchase agreements provided that Plaintiffs and the
5 Class would make payments and in return would receive a new vehicle that would
6 operate properly.

7 1188. Defendants breached their agreements with Plaintiffs and the Class,
8 because the vehicles sold or leased to Plaintiffs and the Class were defective and not
9 of a quality that reasonably would be expected of a new automobile.

10 1189. Plaintiffs and the Class have fully performed their duties under the
11 purchase and lease agreements.

12 1190. Defendants are liable for all damages suffered by Plaintiffs and the
13 Class caused by such breaches of contract.

14 **INDIANA**

15 **COUNT I**

16 **VIOLATION OF THE INDIANA DECEPTIVE CONSUMER SALES ACT**

17 **(Ind. Code § 24-5-0.5-3)**

18 1191. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 1192. Indiana's Deceptive Consumer Sales Act prohibits a person from
21 engaging in a "deceptive trade practice," which includes representing: "(1) That
22 such subject of a consumer transaction has sponsorship, approval, performance,
23 characteristics, accessories, uses, or benefits that they do not have, or that a person
24 has a sponsorship, approval, status, affiliation, or connection it does not have;
25
26
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28

1 (2) That such subject of a consumer transaction is of a particular standard, quality,
2 grade, style or model, if it is not and if the supplier knows or should reasonably
3 know that it is not; ... (7) That the supplier has a sponsorship, approval or affiliation
4 in such consumer transaction that the supplier does not have, and which the supplier
5 knows or should reasonably know that the supplier does not have; ... (b) Any
6 representations on or within a product or its packaging or in advertising or
7 promotional materials which would constitute a deceptive act shall be the deceptive
8 act both of the supplier who places such a representation thereon or therein, or who
9 authored such materials, and such suppliers who shall state orally or in writing that
10 such representation is true if such other supplier shall know or have reason to know
11 that such representation was false.”
12

13
14 1193. Toyota is a person with the meaning of IND. CODE § 24-5-0.5-2(2).

15 1194. In the course of Toyota’s business, it willfully failed to disclose and
16 actively concealed the dangerous risk of throttle control failure and the lack of
17 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS.
18 Accordingly, Toyota engaged in unlawful trade practices, including representing that
19 Defective Vehicles have characteristics, uses, benefits, and qualities which they do
20 not have; representing that Defective Vehicles are of a particular standard and
21 quality when they are not; advertising Defective Vehicles with the intent not to sell
22 them as advertised; and otherwise engaging in conduct likely to deceive.
23

24 1195. Toyota’s actions as set forth above occurred in the conduct of trade or
25 commerce.
26

27 1196. Toyota’s conduct proximately caused injuries to Plaintiffs and the Class.
28

1 1197. Plaintiffs and the Class were injured as a result of Toyota's conduct in
2 that Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
3 their bargain, and their vehicles have suffered a diminution in value. These injuries
4 are the direct and natural consequence of Toyota's misrepresentations and omissions.
5

6 1198. Plaintiffs seek injunctive relief and, if awarded damages under Indiana
7 Deceptive Consumer Protection Act, treble damages pursuant to IND. CODE § 24-5-
8 0.5-4(a)(1).

9 1199. Plaintiffs also seek punitive damages based on the outrageousness and
10 recklessness of Toyota's conduct and its high net worth.

11 **COUNT II**
12 **BREACH OF EXPRESS WARRANTY**
13 **(Ind. Code § 26-1-2-313)**

14 1200. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein.
16

17 1201. Toyota is and was at all relevant times a merchant with respect to motor
18 vehicles.

19 1202. In the course of selling its vehicles, Toyota expressly warranted in
20 writing that the Vehicles were covered by a Basic Warranty.
21

22 1203. Toyota breached the express warranty to repair and adjust to correct
23 defects in materials and workmanship of any part supplied by Toyota. Toyota has
24 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
25 materials and workmanship defects.

26 1204. In addition to this Basic Warranty, Toyota expressly warranted several
27 attributes, characteristics and qualities.
28

1 1205. These warranties are only a sampling of the numerous warranties that
2 Toyota made relating to safety, reliability and operation. Generally these express
3 warranties promise heightened, superior, and state-of-the-art safety, reliability,
4 performance standards, and promote the benefits of ETCS. These warranties were
5 made, *inter alia*, in advertisements, in Toyota's "e brochures," and in uniform
6 statements provided by Toyota to be made by salespeople. These affirmations and
7 promises were part of the basis of the bargain between the parties.
8

9 1206. These additional warranties were also breached because the Defective
10 Vehicles were not fully operational, safe, or reliable (and remained so even after the
11 problems were acknowledged and a recall "fix" was announced), nor did they
12 comply with the warranties expressly made to purchasers or lessees. Toyota did not
13 provide at the time of sale, and has not provided since then, vehicles conforming to
14 these express warranties.
15

16 1207. Furthermore, the limited warranty of repair and/or adjustments to
17 defective parts, fails in its essential purpose because the contractual remedy is
18 insufficient to make the Plaintiffs and the Class whole and because the Defendants
19 have failed and/or have refused to adequately provide the promised remedies within
20 a reasonable time.
21

22 1208. Accordingly, recovery by the Plaintiffs is not limited to the limited
23 warranty of repair or adjustments to parts defective in materials or workmanship, and
24 Plaintiffs seek all remedies as allowed by law.
25

26 1209. Also, as alleged in more detail herein, at the time that Defendants
27 warranted and sold the vehicles they knew that the vehicles did not conform to the
28 warranties and were inherently defective, and Defendants wrongfully and

1 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
2 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
3 and/or fraudulent pretenses.

4 1210. Moreover, many of the damages flowing from the Defective Vehicles
5 cannot be resolved through the limited remedy of “replacement or adjustments,” as
6 those incidental and consequential damages have already been suffered due to
7 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
8 continued failure to provide such limited remedy within a reasonable time, and any
9 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
10 Plaintiffs and the Class whole.
11

12 1211. Finally, due to the Defendants’ breach of warranties as set forth herein,
13 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
14 in IND. CODE § 26-1-2-608, for a revocation of acceptance of the goods, and for a
15 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
16 owned.
17

18 1212. Toyota was provided notice of these issues by numerous complaints
19 filed against it, including the instant complaint, and by numerous individual letters
20 and communications sent by Plaintiffs and the Class before or within a reasonable
21 amount of time after Toyota issued the recall and the allegations of vehicle defects
22 became public.
23

24 1213. As a direct and proximate result of Toyota’s breach of express
25 warranties, Plaintiffs and the Class have been damaged in an amount to be
26 determined at trial.
27
28

COUNT III

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Ind. Code § 26-1-2-314)

1214. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1215. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

1216. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

1217. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1218. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1219. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT IV
REVOCATION OF ACCEPTANCE
(Ind. Code § 26-1-2-608)

1220. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1221. Plaintiffs identified above demanded revocation and the demands were refused.

1222. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

1223. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

1224. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

1225. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

1226. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 1227. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 1228. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 1229. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 1230. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in IND. CODE § 26-1-2-608, for a revocation of acceptance of the goods, and for a
26 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
27 owned.
28

1 1231. Consequently, Plaintiffs and the Class are entitled to revoke their
2 acceptances, receive all payments made to Toyota, and to all incidental and
3 consequential damages, including the costs associated with purchasing safer vehicles,
4 and all other damages allowable under law, all in amounts to be proven at trial.
5

6 **COUNT V**
7 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
8 **(Based On Indiana Law)**

9 1232. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 1233. To the extent Toyota's repair or adjust commitment is deemed not to be
12 a warranty under Indiana's Commercial Code, Plaintiffs plead in the alternative
13 under common law warranty and contract law. Toyota limited the remedies
14 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
15 defects in materials or workmanship of any part supplied by Toyota, and/or
16 warranted the quality or nature of those services to Plaintiffs.
17

18 1234. Toyota breached this warranty or contract obligation by failing to repair
19 the Defective Vehicles evidencing a sudden unintended acceleration problem,
20 including those that were recalled, or to replace them.
21

22 1235. As a direct and proximate result of Defendants' breach of contract or
23 common law warranty, Plaintiffs and the Class have been damaged in an amount to
24 be proven at trial, which shall include, but is not limited to, all compensatory
25 damages, incidental and consequential damages, and other damages allowed by law.
26
27
28

COUNT VI

IN THE ALTERNATIVE, UNJUST ENRICHMENT

(Based On Indiana Law)

1236. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1237. Toyota had knowledge of the safety defects in its vehicles, which it failed to, disclose to Plaintiffs and the Class.

1238. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

1239. Toyota appreciated, accepted and retained the benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits. There is no justification for Plaintiffs' and the Class' impoverishment and Toyota's related enrichment.

1240. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

COUNT VII
FRAUDULENT CONCEALMENT
(Based On Indiana Law)

1241. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1242. Toyota intentionally concealed the above-described material safety information, or acted with reckless disregard for the truth, and denied Plaintiffs and the Class information that is highly relevant to their purchasing decision.

1243. Defendants further affirmatively misrepresented to Plaintiffs in advertising and other forms of communication, including standard and uniform material provided with each car that the vehicles they were selling were new, had no significant defects and would perform and operate properly when driven in normal usage.

1244. Defendants knew these representations were false when made.

1245. The vehicles purchased or leased by Plaintiffs were, in fact, defective, unsafe, and unreliable, because the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms.

1246. Toyota had a duty to disclose that these vehicles were defective, unsafe and unreliable in that the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms because Plaintiffs relied on Toyota's material

1 representations that the vehicles they were purchasing were safe and free from
2 defects.

3
4 1247. The aforementioned concealment was material because if it had been
5 disclosed Plaintiffs would not have bought or leased the vehicles.

6
7 1248. The aforementioned representations were material because they were
8 facts that would typically be relied on by a person purchasing or leasing a new motor
9 vehicle. Toyota knew or recklessly disregarded that its representations were false
10 because it knew that people had died in its vehicles' unintended acceleration between
11 2002 and 2009. Toyota intentionally made the false statements in order to sell
12 vehicles.
13

14 1249. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
15 disclose the acceleration problems and Toyota's affirmative assurance that its
16 vehicles were safe and reliable and other similar false statements – in purchasing or
17 leasing Toyota's vehicles.
18

19
20 1250. As a result of their reliance, Plaintiffs have been injured in an amount to
21 be proven at trial, including, but not limited to, their lost benefit of the bargain and
22 overpayment at the time of purchase and/or the diminished value of their vehicles.
23

24 1251. Defendants' conduct was knowing, intentional, with malice,
25 demonstrated a complete lack of care, and was in reckless disregard for the rights of
26 Plaintiffs. Plaintiffs and the Class are therefore entitled to an award of punitive
27 damages.
28

IOWA

COUNT I

**VIOLATIONS OF THE PRIVATE RIGHT OF ACTION
FOR CONSUMER FRAUDS ACT**

(Iowa Code § 714H.1, *et seq.*)

1252. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1253. Defendants are “persons” under IOWA CODE § 714H.2(7).

1254. Plaintiffs are “consumers,” as defined by IOWA CODE § 714H.2(3), who purchased or leased one or more Defective Vehicles.

1255. Defendants both participated in unfair or deceptive acts or practices that violated Iowa’s Private Right of Action for Consumer Fraud Act (“Iowa CFA”), IOWA CODE § 714H.1, *et seq.*, as described above and below. Defendants each are directly liable for these violations of law. TMC also is liable for TMS’s violations of the Iowa CFA because TMS acts as TMC’s general agent in the United States for purposes of sales and marketing.

1256. By failing to disclose and actively concealing the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS, Defendants engaged in deceptive business practices prohibited by the Iowa CFA, IOWA CODE § 714H.1, *et seq.*, including (1) representing that Defective Vehicles have characteristics, uses, benefits, and qualities which they do not have, (2) representing that Defective Vehicles are of a particular standard, quality, and grade when they are not, (3) advertising Defective Vehicles with the intent not to sell them as advertised, and (4) engaging in acts or practices which are otherwise unfair, misleading, false or deceptive to the consumer.

1 1257. As alleged above, Defendants made numerous material statements about
2 the safety and reliability of Defective Vehicles that were either false or misleading.
3 Each of these statements contributed to the deceptive context of TMC's and TMS's
4 unlawful advertising and representations as a whole.

5
6 1258. Defendants knew that the ETCS in Defective Vehicles was defectively
7 designed or manufactured, would fail without warning, and was not suitable for its
8 intended use of regulating throttle position and vehicle speed based on driver
9 commands. Defendants nevertheless failed to warn Plaintiffs about these inherent
10 dangers despite having a duty to do so.

11
12 1259. Defendants each owed Plaintiffs a duty to disclose the defective nature
13 of Defective Vehicles, including the dangerous risk of throttle control failure, the
14 ETCS defects, and the lack of adequate fail-safe mechanisms, because they:

15 a. Possessed exclusive knowledge of the defects rendering
16 Defective Vehicles inherently more dangerous and unreliable than similar vehicles;

17 b. Intentionally concealed the hazardous situation with Defective
18 Vehicles through their deceptive marketing campaign and recall program that they
19 designed to hide the life-threatening problems from Plaintiffs; and/or
20

21 c. Made incomplete representations about the safety and reliability
22 of Defective Vehicles generally, and ETCS in particular, while purposefully
23 withholding material facts from Plaintiffs that contradicted these representations.

24 1260. Defective Vehicles equipped with ETCS pose an unreasonable risk of
25 death or serious bodily injury to Plaintiffs, passengers, other motorists, pedestrians,
26 and the public at large, because they are susceptible to incidents of sudden
27 unintended acceleration.
28

1 1261. Whether or not a vehicle (a) accelerates only when commanded to do so
2 and (b) decelerates and stops when commanded to do so are facts that a reasonable
3 consumer would consider important in selecting a vehicle to purchase or lease.
4 When Plaintiffs bought a Toyota vehicle for personal, family, or household purposes,
5 they reasonably expected the vehicle would (a) not accelerate unless commanded to
6 do so by application of the accelerator pedal or other driver-controlled means;
7 (b) decelerate to a stop when the brake pedal was applied, and was equipped with
8 any necessary fail-safe mechanisms including a brake-override.
9

10 1262. TMC's and TMS's unfair or deceptive acts or practices were likely to
11 and did in fact deceive reasonable consumers, including Plaintiffs, about the true
12 safety and reliability of Defective Vehicles.
13

14 1263. As a result of its violations of the Iowa CFA detailed above, Defendants
15 caused actual damage to Plaintiffs and, if not stopped, will continue to harm
16 Plaintiffs. Plaintiffs currently own or lease, or within the class period have owned or
17 leased, Defective Vehicles that are defective and inherently unsafe. ETCS defects
18 and the resulting unintended acceleration incidents have caused the value of
19 Defective Vehicles to plummet.
20

21 1264. Plaintiffs risk irreparable injury as a result of TMC's and TMS's acts
22 and omissions in violation of the Iowa CFA, and these violations present a
23 continuing risk to Plaintiffs as well as to the general public.
24

25 1265. Plaintiffs and the Class sustained damaged as a result of the Defendants'
26 unlawful acts and are, therefore, entitled to damages and other relief as provided
27 under Chapter 714H of the Iowa CFA. Because Defendants' conduct was committed
28 willfully, Plaintiffs seek treble damages as provided in IOWA CODE § 714H.5(4).

1 1266. Plaintiffs also seek court costs and attorneys' fees as a result of
2 Defendant's violation of Chapter 714H as provided in IOWA CODE § 714H.5(2).

3 **COUNT II**
4 **BREACH OF EXPRESS WARRANTY**
5 **(Iowa Code § 554.2313)**

6 1267. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 1268. Toyota is and was at all relevant times a merchant with respect to motor
9 vehicles under IOWA CODE § 544.2104.

10 1269. In the course of selling its vehicles, Toyota expressly warranted in
11 writing that the Vehicles were covered by a Basic Warranty.

12 1270. Toyota breached the express warranty to repair and adjust to correct
13 defects in materials and workmanship of any part supplied by Toyota. Toyota has
14 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
15 materials and workmanship defects.

16 1271. These warranties are only a sampling of the numerous warranties that
17 Toyota made relating to safety, reliability and operation, which are more fully
18 outlined in Section IV.A., *supra*. Generally these express warranties promise
19 heightened, superior, and state-of-the-art safety, reliability, performance standards,
20 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
21 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
22 Toyota to be made by salespeople. These affirmations and promises were part of the
23 basis of the bargain between the parties.
24
25
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1 1272. These additional warranties were also breached because the Defective
2 Vehicles were not fully operational, safe, or reliable (and remained so even after the
3 problems were acknowledged and a recall “fix” was announced), nor did they
4 comply with the warranties expressly made to purchasers or lessees. Toyota did not
5 provide at the time of sale, and has not provided since then, vehicles conforming to
6 these express warranties.
7

8 1273. Furthermore, the limited warranty of repair and/or adjustments to
9 defective parts, fails in its essential purpose because the contractual remedy is
10 insufficient to make the Plaintiffs and the Class whole and because the Defendants
11 have failed and/or have refused to adequately provide the promised remedies within
12 a reasonable time.
13

14 1274. Accordingly, recovery by the Plaintiffs is not limited to the limited
15 warranty of repair or adjustments to parts defective in materials or workmanship, and
16 Plaintiffs seek all remedies as allowed by law.
17

18 1275. Also, as alleged in more detail herein, at the time that Defendants
19 warranted and sold the vehicles they knew that the vehicles did not conform to the
20 warranties and were inherently defective, and Defendants wrongfully and
21 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
22 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
23 and/or fraudulent pretenses. The enforcement under these circumstances of any
24 limitations whatsoever precluding the recovery of incidental and/or consequential
25 damages is unenforceable .
26

27 1276. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 1277. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in IOWA CODE § 554.2711, for a revocation of acceptance of the goods, and for a
10 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
11 owned and for such other incidental and consequential damages as allowed under
12 IOWA CODE §§ 544.2711 and 544.2608.
13

14 1278. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 1279. As a direct and proximate result of Toyota's breach of express
21 warranties, Plaintiffs and the Class have been damaged in an amount to be
22 determined at trial.

23 **COUNT III**
24 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
25 **(Iowa Code § 544.2314)**

26 1280. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 1281. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles under IOWA COM. CODE § 544.2104.

3 1282. A warranty that the Defective Vehicles were in merchantable condition
4 was implied by law in the instant transaction, pursuant to IOWA CODE § 544.2314.
5

6 1283. These vehicles, when sold and at all times thereafter, were not in
7 merchantable condition and are not fit for the ordinary purpose for which cars are
8 used. Specifically, the Defective Vehicles are inherently defective in that there are
9 defects in the vehicle control systems that permit sudden unintended acceleration to
10 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
11 such SUA events, nor do they have a brake-override; and the ETCS system was not
12 adequately tested.
13

14 1284. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 1285. As a direct and proximate result of Toyota's breach of the warranties of
21 merchantability, Plaintiffs and the Class have been damaged in an amount to be
22 proven at trial.

23 **COUNT IV**
24 **REVOCATION OF ACCEPTANCE**
25 **(Iowa Code § 544.2608)**

26 1286. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 1287. Plaintiffs identified above demanded revocation and the demands were
2 refused.

3 1288. Plaintiffs and the Class had no knowledge of such defects and
4 nonconformities, were unaware of these defects, and reasonably could not have
5 discovered them when they purchased or leased their automobiles from Toyota. On
6 the other hand, Toyota was aware of the defects and nonconformities at the time of
7 sale and thereafter.

9 1289. Acceptance was reasonably induced by the difficulty of discovery of the
10 defects and nonconformities before acceptance.

11 1290. There has been no substantial change in the condition of Plaintiffs'
12 vehicles not caused by the defects and nonconformities.

14 1291. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
15 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
16 paid.

17 1292. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them.

23 1293. These defects and nonconformities substantially impaired the value of
24 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
25 basic sources. First, the Defective Vehicles fail in their essential purpose because
26 they present an unreasonably high risk of sudden unintended acceleration (a risk
27 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
28

1 Second, the repair and adjust warranty has failed of its essential purpose because
2 Toyota cannot repair or adjust the Defective Vehicles.

3 1294. Plaintiffs and the Class provided notice of their intent to seek revocation
4 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
5 (and many Class members) have requested that Toyota accept return of their vehicles
6 and return all payments made. Plaintiffs on behalf of themselves and the Class
7 hereby demand revocation and tender their Defective Vehicles.
8

9 1295. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them, as they must continue using them due to the
14 financial burden of securing alternative means of transport for an uncertain and
15 substantial period of time.
16

17 1296. Finally, due to the Defendants' breach of warranties as set forth herein,
18 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
19 in IOWA CODE § 544.2711, for a revocation of acceptance of the goods, and for a
20 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
21 owned and for such other incidental and consequential damages as allowed under
22 IOWA CODE § 544.2711.
23

24 1297. Consequently, Plaintiffs and the Class are entitled to revoke their
25 acceptances, receive all payments made to Toyota, and to all incidental and
26 consequential damages, including the costs associated with purchasing safer vehicles,
27 and all other damages allowable under law, all in amounts to be proven at trial.
28

COUNT V

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On Iowa Law)

1298. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1299. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under the Uniform Commercial Code as adopted in Iowa, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

1300. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

1301. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VI

FRAUD BY CONCEALMENT

(Based On Iowa Law)

1302. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 1303. Defendants had a duty to disclose the above-described safety issues
2 because they consistently marketed their vehicles as safe and proclaimed that safety
3 is one of Toyota's highest corporate priorities. Once Defendants made
4 representations to the public about safety, Defendants were under a duty to disclose
5 these omitted facts, because where one does speak one must speak the whole truth
6 and not conceal any facts which materially qualify those facts stated. One who
7 volunteers information must be truthful, and the telling of a half-truth calculated to
8 deceive is fraud.
9

10 1304. In addition, Defendants had a duty to disclose these omitted material
11 facts because they were known and/or accessible only to Defendants who have
12 superior knowledge and access to the facts, and Defendants knew they were not
13 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
14 were material because they directly impact the safety of the Defective Vehicles.
15 Whether or not a vehicle accelerates only at the driver's command, and whether a
16 vehicle will stop or not upon application of the brake by the driver, are material
17 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
18 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
19

20 1305. Defendants actively concealed and/or suppressed these material facts, in
21 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
22 Defective Vehicles at a higher price for the vehicles, which did not match the
23 vehicles' true value.
24

25 1306. Defendants still have not made full and adequate disclosure and
26 continue to defraud Plaintiffs and the Class.
27
28

1 1307. Plaintiffs and the Class were unaware of these omitted material facts
2 and would not have acted as they did if they had known of the concealed and/or
3 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
4 in exclusive control of the material facts and such facts were not known to the public
5 or the Class.
6

7 1308. As a result of the concealment and/or suppression of the facts, Plaintiffs
8 and the Class sustained damage.

9 1309. Defendants' acts were done maliciously, oppressively, deliberately, with
10 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
11 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
12 punitive damages in an amount sufficient to deter such conduct in the future, which
13 amount is to be determined according to proof.
14

15 **COUNT VII**
16 **UNJUST ENRICHMENT**
17 **(Based On Iowa Law)**

18 1310. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 1311. As a result of their wrongful and fraudulent acts and omissions, as set
21 forth above, pertaining to the design defect of their vehicles and the concealment of
22 the defect, Defendants charged a higher price for their vehicles than the vehicles'
23 true value and Defendants obtained monies which rightfully belong to Plaintiffs.
24

25 1312. Defendants enjoyed the benefit of increased financial gains, to the
26 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
27
28

1 actually had lower values. It would be inequitable and unjust for Defendants to
2 retain these wrongfully obtained profits.

3 1313. Plaintiffs, therefore, seek an order establishing Defendants as
4 constructive trustees of the profits unjustly obtained, plus interest.
5

6 **KANSAS**

7 **COUNT I**

8 **VIOLATIONS OF THE KANSAS CONSUMER PROTECTION ACT**

9 **(Kan. Stat. Ann. § 50-623, *et seq.*)**

10 1314. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 1315. Defendants are “suppliers” under § 50-624(*l*) of the Kansas Consumer
13 Protection Act (“Kansas CPA”)
14

15 1316. Plaintiffs are “consumers,” as defined by § 50-624(b) of the Kansas
16 CPA, who purchased or leased one or more Defective Vehicles.

17 1317. Defendants both participated in deceptive acts or practices that violated
18 the Kansas CPA, as described above and below. Defendants each are directly liable
19 for these violations of law. TMC also is liable for TMS’s violations of the CLRA
20 because TMS acts as TMC’s general agent in the United States for purposes of sales
21 and marketing.
22

23 1318. Defendants engaged in deceptive acts or practices prohibited by the
24 Kansas CPA, including (1) representing that Defective Vehicles have characteristics,
25 uses, and benefits that they do not have and (2) representing that Defective Vehicles
26 are of a particular standard, quality, and grade when they are of another which differs
27 materially from the representation. Specifically, as alleged above, Defendants made
28

1 numerous material statements about the safety and reliability of Defective Vehicles
2 that were either false or misleading. Each of these statements contributed to the
3 deceptive context of TMC's and TMS's unlawful advertising and representations as
4 a whole.

5
6 1319. Defendants knew or had reason to know that its representations were
7 false. Defendants knew that the ETCS in Defective Vehicles was defectively
8 designed or manufactured, would fail without warning, and was not suitable for its
9 intended use of regulating throttle position and vehicle speed based on driver
10 commands. Defendants nevertheless failed to warn Plaintiffs about these inherent
11 dangers despite having a duty to do so.

12
13 1320. Defendants engaged in further deceptive acts or practices prohibited by
14 the Kansas CPA by willfully failing to disclose or willfully concealing, suppressing,
15 or omitting material facts about Defective Vehicles. Specifically, Defendants failed
16 to disclose and actively concealed the dangerous risk of throttle control failure and
17 the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with
18 ETCS. Defendants knew that the ETCS in Defective Vehicles was defectively
19 designed or manufactured, would fail without warning, and was not suitable for its
20 intended use of regulating throttle position and vehicle speed based on driver
21 commands. Defendants nevertheless failed to warn Plaintiffs and the Class about
22 these inherent dangers despite having a duty to do so.

23
24 1321. Whether or not a vehicle (a) accelerates only when commanded to do so
25 and (b) decelerates and stops when commanded to do so are facts that a reasonable
26 consumer would consider important in selecting a vehicle to purchase or lease.
27 When Plaintiffs bought a Toyota Vehicle for personal, family, or household
28

1 purposes, they reasonably expected the vehicle would (a) not accelerate unless
2 commanded to do so by application of the accelerator pedal or other driver-
3 controlled means; (b) decelerate to a stop when the brake pedal was applied, and was
4 equipped with any necessary fail-safe mechanisms including a brake-override.

5
6 1322. Defendants' acts or practices alleged above are unconscionable because,
7 among other reasons, Defendants knew or had reason to know they had had made
8 misleading statements of opinion on which Plaintiffs were likely to rely to their
9 detriment.

10 1323. Defendants' deceptive and unconscionable acts or practices were likely
11 to and did in fact deceive reasonable consumers, including Plaintiffs, about the true
12 safety and reliability of Defective Vehicles as a result of Defendants' violations of
13 the Kansas CPA.
14

15 1324. Plaintiffs and the Class suffered loss as a result of Defendants'
16 violations of the Kansas CPA detailed above. Plaintiffs currently own or lease, or
17 within the class period have owned or leased, Defective Vehicles that are defective
18 and inherently unsafe. ETCS defects and the resulting unintended acceleration
19 incidents have caused the value of Defective Vehicles to plummet.
20

21 1325. Pursuant to § 50-634(b) of the Kansas CPA, Plaintiffs seek monetary
22 relief against Defendants measured as the greater of (a) actual damages in an amount
23 to be determined at trial and (b) civil penalties provided for by § 50-636 of the
24 Kansas CPA.

25 1326. Plaintiffs also seek punitive damages against Defendants because they
26 acted willfully, wantonly, fraudulently, or maliciously. Defendants intentionally and
27 willfully misrepresented the safety and reliability of Defective Vehicles, deceived
28

1 Plaintiffs on life-or-death matters, and concealed material facts that only it knew, all
2 to avoid the expense and public relations nightmare of correcting a deadly flaw in the
3 Defective Vehicles it repeatedly promised Plaintiffs were safe. Defendants'
4 unlawful conduct constitutes malice, oppression, and fraud warranting punitive
5 damages.
6

7 1327. Plaintiffs risk irreparable injury as a result of Defendants' deceptive and
8 unconscionable acts or practices in violation of the Kansas CPA, and these violations
9 present a continuing risk to Plaintiffs as well as to the general public.

10 1328. The recalls and repairs instituted by Toyota have not been adequate.
11 Defective Vehicles still are defective and the "confidence" booster offer of an
12 override is not an effective remedy and is not offered to all Defective Vehicles,
13 including the 2002-2007 Camry.
14

15 1329. Plaintiffs and the Class further seek an order enjoining Defendants'
16 deceptive and unconscionable acts or practices, restitution, punitive damages, costs
17 of Court, attorney's fees, and any other just and proper relief available under the
18 Kansas CPA.
19

20 **COUNT II**
21 **BREACH OF EXPRESS WARRANTY**
22 **(Kan. Stat. Ann. § 84-2-313)**

23 1330. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1331. Toyota is and was at all relevant times a merchant with respect to motor
26 vehicles under KAN. STAT. ANN. § 84-2-104.
27
28

1 1332. In the course of selling its vehicles, Toyota expressly warranted in
2 writing that the Vehicles were covered by a Basic Warranty.

3 1333. Toyota breached the express warranty to repair and adjust to correct
4 defects in materials and workmanship of any part supplied by Toyota. Toyota has
5 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
6 materials and workmanship defects.

7
8 1334. In addition to this Basic Warranty, Toyota expressly warranted several
9 attributes, characteristics and qualities as set forth above.

10 1335. These warranties are only a sampling of the numerous warranties that
11 Toyota made relating to safety, reliability and operation, which are more fully
12 outlined in Section IV.A., *supra*. Generally these express warranties promise
13 heightened, superior, and state-of-the-art safety, reliability, performance standards,
14 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
15 advertisements, in Toyota's "e brochures," and in uniform statements provided by
16 Toyota to be made by salespeople. These affirmations and promises were part of the
17 basis of the bargain between the parties.
18

19 1336. These additional warranties were also breached because the Defective
20 Vehicles were not fully operational, safe, or reliable (and remained so even after the
21 problems were acknowledged and a recall "fix" was announced), nor did they
22 comply with the warranties expressly made to purchasers or lessees. Toyota did not
23 provide at the time of sale, and has not provided since then, vehicles conforming to
24 these express warranties.
25

26 1337. Furthermore, the limited warranty of repair and/or adjustments to
27 defective parts, fails in its essential purpose because the contractual remedy is
28

1 insufficient to make the Plaintiffs and the Class whole and because the Defendants
2 have failed and/or have refused to adequately provide the promised remedies within
3 a reasonable time.

4 1338. Accordingly, recovery by the Plaintiffs and the Class is not limited to
5 the limited warranty of repair or adjustments to parts defective in materials or
6 workmanship, and Plaintiffs and the Class seek all remedies as allowed by law.

8 1339. Also, as alleged in more detail herein, at the time that Defendants
9 warranted and sold the vehicles they knew that the vehicles did not conform to the
10 warranties and were inherently defective, and Defendants wrongfully and
11 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
12 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
13 and/or fraudulent pretenses. The enforcement under these circumstances of any
14 limitations whatsoever precluding the recovery of incidental and/or consequential
15 damages is unenforceable.
16

17 1340. Moreover, many of the damages flowing from the Defective Vehicles
18 cannot be resolved through the limited remedy of “replacement or adjustments,” as
19 those incidental and consequential damages have already been suffered due to
20 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
21 continued failure to provide such limited remedy within a reasonable time, and any
22 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
23 Plaintiffs and the Class whole.
24

25 1341. Finally, due to the Defendants’ breach of warranties as set forth herein,
26 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
27 in KAN. STAT. ANN. § 84-2-711, for a revocation of acceptance of the goods, and for
28

1 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
2 owned and for such other incidental and consequential damages as allowed under
3 KAN. STAT. ANN. §§ 84-2-711 and 84-2-608.

4 1342. Toyota was provided notice of these issues by numerous complaints
5 filed against it, including the instant complaint, and by numerous individual letters
6 and communications sent by Plaintiffs and the Class before or within a reasonable
7 amount of time after Toyota issued the recall and the allegations of vehicle defects
8 became public.

9 1343. As a direct and proximate result of Toyota's breach of express
10 warranties, Plaintiffs and the Class have been damaged in an amount to be
11 determined at trial.

12
13
14 **COUNT III**
15 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
16 **(Kan. Stat. Ann. § 84-2-314)**

17 1344. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 1345. Plaintiffs are "natural persons" within the meaning of KAN. STAT. ANN.
20 § 84-2-318.

21 1346. Toyota is and was at all relevant times a merchant with respect to motor
22 vehicles under KAN. STAT. ANN. § 84-2-104.

23 1347. A warranty that the Defective Vehicles were in merchantable condition
24 was implied by law in the instant transaction, pursuant to KAN. STAT. ANN. § 84-2-
25 314.
26
27
28

1 1348. These vehicles, when sold and at all times thereafter, were not in
2 merchantable condition and are not fit for the ordinary purpose for which cars are
3 used. Specifically, the Defective Vehicles are inherently defective in that there are
4 defects in the vehicle control systems that permit sudden unintended acceleration to
5 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
6 such SUA events, nor do they have a brake-override; and the ETCS system was not
7 adequately tested.
8

9 1349. Toyota was provided notice of these issues by numerous complaints
10 filed against it, including the instant complaint, and by numerous individual letters
11 and communications sent by Plaintiffs and the Class before or within a reasonable
12 amount of time after Toyota issued the recall and the allegations of vehicle defects
13 became public.
14

15 1350. Privity is not required because the Defective Vehicles are inherently
16 dangerous.
17

18 1351. As a direct and proximate result of Toyota's breach of the warranties of
19 merchantability, Plaintiffs and the Class have been damaged in an amount to be
20 proven at trial.
21

22 **COUNT IV**
23 **REVOCATION OF ACCEPTANCE**
24 **(Kan. Stat. Ann. § 84-2-608)**

25 1352. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.
27

28 1353. Plaintiffs identified above demanded revocation and the demands were
refused.

1 1354. Plaintiffs and the Class had no knowledge of such defects and
2 nonconformities, were unaware of these defects, and reasonably could not have
3 discovered them when they purchased or leased their automobiles from Toyota. On
4 the other hand, Toyota was aware of the defects and nonconformities at the time of
5 sale and thereafter.

7 1355. Acceptance was reasonably induced by the difficulty of discovery of the
8 defects and nonconformities before acceptance.

9 1356. There has been no change in the condition of Plaintiffs' vehicles not
10 caused by the defects and nonconformities.

11 1357. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
12 return of the Defective Vehicles and to refund Plaintiffs' and the Class' purchase
13 price and monies paid.

15 1358. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them.

21 1359. These defects and nonconformities substantially impaired the value of
22 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
23 basic sources. First, the Defective Vehicles fail in their essential purpose because
24 they present an unreasonably high risk of sudden unintended acceleration (a risk
25 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
26 Second, the repair and adjust warranty has failed of its essential purpose because
27 Toyota cannot repair or adjust the Defective Vehicles.

1 1360. Plaintiffs and the Class provided notice of their intent to seek revocation
2 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
3 (and many Class members) have requested that Toyota accept return of their vehicles
4 and return all payments made. Plaintiffs on behalf of themselves and the Class
5 hereby demand revocation and tender their Defective Vehicles.
6

7 1361. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them, as they must continue using them due to the
12 financial burden of securing alternative means of transport for an uncertain and
13 substantial period of time.
14

15 1362. Finally, due to the Defendants' breach of warranties as set forth herein,
16 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
17 in KAN. STAT. ANN. § 84-2-711, for a revocation of acceptance of the goods, and for
18 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
19 owned and for such other incidental and consequential damages as allowed under
20 KAN. STAT. ANN. § 84-2-711.
21

22 1363. To the extent such allegations are necessary, Plaintiffs allege that
23 authorized Toyota dealers from whom Plaintiffs purchased defective vehicles acted
24 as the agents of TMS and/or TMC. Plaintiffs further allege, to the extent such
25 allegations are necessary, that Toyota's warranties failed of their essential purpose.
26 Plaintiffs further allege, to the extent such allegations are necessary, that Toyota's
27
28

1 warranty and the purchase contracts for Defective Vehicles were received by
2 Plaintiffs as a single agreement.

3 1364. Consequently, Plaintiffs and the Class are entitled to revoke their
4 acceptances, receive all payments made to Toyota, and to all incidental and
5 consequential damages, including the costs associated with purchasing safer vehicles,
6 and all other damages allowable under law, all in amounts to be proven at trial.
7

8 **COUNT V**

9 **BREACH OF CONTRACT/Common Law Warranty**

10 **(Based On Kansas Law)**

11 1365. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1366. To the extent Toyota's repair or adjust commitment is deemed not to be
14 a warranty under the Uniform Commercial Code as adopted in Kansas, Plaintiffs and
15 the Class plead in the alternative under common law warranty and contract law.
16 Toyota limited the remedies available to Plaintiffs and the Class to just repairs and
17 adjustments needed to correct defects in materials or workmanship of any part
18 supplied by Toyota, and/or warranted the quality or nature of those services to
19 Plaintiffs.
20

21 1367. Toyota breached this warranty or contract obligation by failing to repair
22 the Defective Vehicles evidencing a sudden unintended acceleration problem,
23 including those that were recalled, or to replace them.
24

25 1368. To the extent such allegations are necessary, Plaintiffs and the Class
26 allege that they relied on Toyota's common law warranties.
27
28

1 vehicle will stop or not upon application of the brake by the driver, are material
2 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
3 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

4 1374. Defendants actively concealed and/or suppressed these material facts, in
5 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
6 Defective Vehicles at a higher price for the vehicles, which did not match the
7 vehicles' true value.
8

9 1375. Defendants still have not made full and adequate disclosure and
10 continue to defraud Plaintiffs and the Class.

11 1376. Plaintiffs and the Class were unaware of these omitted material facts
12 and would not have acted as they did if they had known of the concealed and/or
13 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
14 in exclusive control of the material facts and such facts were not known to the public
15 or the Class.
16

17 1377. As a result of the concealment and/or suppression of the facts, Plaintiffs
18 and the Class sustained damage. Plaintiffs and the Class reserve their right to elect
19 either to (a) rescind their purchase or lease of Defective Vehicles and obtain
20 restitution (b) affirm their purchase or lease of Defective Vehicles and recover
21 damages.
22

23 1378. Defendants' acts were done willfully, wantonly, fraudulently, or
24 maliciously, oppressively, deliberately, with intent to defraud, and in reckless
25 disregard of Plaintiffs' and the Class' rights and well-being to enrich Defendants.
26 Defendants' conduct warrants an assessment of punitive damages in an amount
27
28

1 sufficient to deter such conduct in the future, which amount is to be determined
2 according to proof.

3 **COUNT VII**
4 **UNJUST ENRICHMENT**
5 **(Based On Kansas Law)**

6 1379. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 1380. As a result of their wrongful and fraudulent acts and omissions, as set
9 forth above, pertaining to the design defect of their vehicles and the concealment of
10 the defect, Defendants charged a higher price for their vehicles than the vehicles'
11 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

12 1381. Defendants enjoyed the benefit of increased financial gains, to the
13 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
14 actually had lower values. It would be inequitable and unjust for Defendants to
15 retain these wrongfully obtained profits.

16 1382. Plaintiffs, therefore, seek an order establishing Defendants as
17 constructive trustees of the profits unjustly obtained, plus interest.

18 **KENTUCKY**
19 **COUNT I**
20 **VIOLATION OF THE KENTUCKY CONSUMER PROTECTION ACT**
21 **(Ky. Rev. Stat. § 367.110, *et seq.*)**

22 1383. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

1 1384. Defendants misrepresented the safety of the Defective Vehicles after
2 learning of their defects with the intent that Plaintiffs relied on such representations
3 in their decision regarding the purchase, lease and/or use of the Defective Vehicles.

4 1385. Plaintiffs did, in fact, rely on such representations in their decision
5 regarding the purchase, lease and/or use of the Defective Vehicles.
6

7 1386. Through those misleading and deceptive statements and false promises,
8 Defendants violated the Kentucky Consumer Protection Act (“KCPA”).

9 1387. The KCPA applies to Defendants’ transactions with Plaintiffs because
10 Defendants’ deceptive scheme was carried out in Kentucky and affected Plaintiffs.

11 1388. Defendants also failed to advise NHSTA and the public about what they
12 knew about the sudden and unintended acceleration defects in the Defective
13 Vehicles.
14

15 1389. Plaintiffs relied on Defendants’ silence as to known defects in
16 connection with their decision regarding the purchase, lease and/or use of the
17 Defective Vehicles.

18 1390. As a direct and proximate result of Defendants’ deceptive conduct and
19 violation of the KCPA, Plaintiffs have sustained and will continue to sustain
20 economic losses and other damages for which they are entitled to compensatory and
21 equitable damages and declaratory relief in an amount to be proven at trial.
22

23 **COUNT II**
24 **BREACH OF EXPRESS WARRANTY**
25 **(Ky. Rev. Stat. § 355.2-313)**

26 1391. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 1392. Defendants expressly warranted – through statements and
2 advertisements described above – that the vehicles were of high quality, and at a
3 minimum, would actually work properly and safely.

4 1393. Defendants breached this warranty by knowingly selling to Plaintiffs
5 vehicles with dangerous defects, and which were not of high quality.

6 1394. Plaintiffs have been damaged as a direct and proximate result of the
7 breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were
8 and are worth far less than what the Plaintiffs paid to purchase, which was
9 reasonably foreseeable to Defendants.
10

11 **COUNT III**
12 **BREACH OF IMPLIED WARRANTIES OF MERCHANTABILITY**
13 **(Ky. Rev. Stat. § 335.2-314)**

14 1395. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein.
16

17 1396. Defendants impliedly warranted that their vehicles were of good and
18 merchantable quality and fit, and safe for their ordinary intended use – transporting
19 the driver and passengers in reasonable safety during normal operation, and without
20 unduly endangering them or members of the public.

21 1397. As described above, there were dangerous defects in the vehicles
22 manufactured, distributed, and/or sold by Defendants, which Plaintiffs purchased,
23 including, but not limited to, defects that caused the vehicles to suddenly and
24 unintentionally accelerate, and the lack of safety slow and stop the vehicle when
25 such acceleration occurred.
26
27
28

1 1398. These dangerous defects existed at the time the vehicles left
2 Defendants' manufacturing facilities and at the time they were sold to Plaintiffs.
3 Furthermore, because of these dangerous defects, Plaintiffs did not receive the
4 benefit of their bargain and the vehicles have suffered a diminution in value.

5 1399. These dangerous defects were the direct and proximate cause of
6 damages to the Plaintiffs and the Class.
7

8 **COUNT IV**
9 **FRAUDULENT CONCEALMENT**
10 **(Based On Kentucky Law)**

11 1400. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1401. Toyota intentionally concealed the above-described material safety
14 information, or acted with reckless disregard for the truth, and denied Plaintiff and
15 the Class information that is highly relevant to their purchasing decision.
16

17 1402. Defendants further affirmatively misrepresented to Plaintiffs in
18 advertising and other forms of communication, including standard and uniform
19 material provided with each car that the vehicles they were selling were new, had no
20 significant defects and would perform and operate properly when driven in normal
21 usage.
22

23 1403. Defendants knew these representations were false when made.

24 1404. The vehicles purchased or leased by Plaintiffs were, in fact, defective,
25 unsafe, and unreliable, because the vehicles were subject to sudden, extreme
26 acceleration without adequate fail-safe mechanisms.
27
28

1 1405. Toyota had a duty to disclose that these vehicles were defective, unsafe
2 and unreliable in that the vehicles were subject to sudden, extreme acceleration
3 without adequate fail-safe mechanisms because Plaintiffs relied on Toyota's material
4 representations that the vehicles they were purchasing were safe and free from defects.
5

6 1406. The aforementioned concealment was material because if it had been
7 disclosed Plaintiffs would not have bought or leased the vehicles.

8 1407. The aforementioned representations were material because they were
9 facts that would typically be relied on by a person purchasing or leasing a new motor
10 vehicle. Toyota knew or recklessly disregarded that its representations were false
11 because it knew that people had died in its vehicles' unintended acceleration between
12 2002 and 2009. Toyota intentionally made the false statements in order to sell
13 vehicles.
14

15 1408. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
16 disclose the acceleration problems and Toyota's affirmative assurance that its
17 vehicles were safe and reliable and other similar false statements – in purchasing or
18 leasing Toyota's vehicles.
19

20 1409. As a result of their reliance, Plaintiffs have been injured in an amount to
21 be proven at trial, including, but not limited to, their lost benefit of the bargain and
22 overpayment at the time of purchase and/or the diminished value of their vehicles.

23 1410. Defendants' conduct was knowing, intentional, with malice,
24 demonstrated a complete lack of care, and was in reckless disregard for the rights of
25 Plaintiffs. Plaintiffs are therefore entitled to an award of punitive damages.
26
27
28

COUNT V
UNJUST ENRICHMENT
(Based On Kentucky Law)

1411. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1412. Plaintiffs paid Toyota the value of vehicles that are non-defective, and in exchange, Toyota provided Plaintiffs vehicles that are, in fact, defective.

1413. Further, Plaintiffs paid Toyota the value for vehicles that would not be compromised by substantial, invasive repairs, and in return received vehicles that require such repairs.

1414. Further, Plaintiffs paid Toyota for vehicles they could operate, and in exchange, Toyota provided Plaintiffs vehicles that could not be normally operated because their defects posed the possibility of life-threatening injuries or death.

1415. As such, Plaintiffs conferred a windfall upon Toyota, which knows of the windfall and has retained such benefits, which would be unjust for Toyota to retain such benefits

1416. As a direct and proximate result of Toyota's unjust enrichment, Plaintiffs have suffered and continue to suffer various damages, including, but not limited to, restitution of all amounts by which Defendants were enriched through their misconduct.

LOUISIANA

COUNT I

LOUISIANA PRODUCTS LIABILITY ACT

(La. Rev. Stat. § 9:2800.51, *et seq.*)

1417. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1418. Plaintiffs allege that Toyota has defectively designed, manufactured, sold or otherwise placed in the stream of commerce Defective Vehicles as set forth above.

1419. The product in question is unreasonably dangerous for the following reasons:

a. It is unreasonably dangerous in construction or composition as provided in LA. REV. STAT. § 9:2800.55;

b. It is unreasonably dangerous in design as provided in LA. REV. STAT. § 9:2800.56;

c. It is unreasonably dangerous because an adequate warning about the product was not provided as required by LA. REV. STAT. § 9:2800.57; and

d. It is unreasonably dangerous because it does not conform to an express warranty of the manufacturer about the product that render it unreasonably dangerous under LA. REV. STAT. § 9:2800.55, *et seq.*, that existed at the time the product left the control of the manufacturer.

1420. Toyota knew and expected for the Defective Vehicles to eventually be sold to and operated by purchasers and/or eventual owners of the Defective Vehicles,

1 including Plaintiffs; consequently, Plaintiffs were an expected user of the product
2 which Toyota manufactured.

3 1421. The Defective Vehicles reached Plaintiffs without substantial changes in
4 their condition from time of completion of manufacture by Toyota.

5 1422. The defects in the Defective Vehicles could not have been contemplated
6 by any reasonable person expected to operate the Defective Vehicles, and, therefore,
7 presented an unreasonably dangerous situation for expected users of the Defective
8 Vehicles even though the Defective Vehicles were operated by expected users in a
9 reasonable manner.
10

11 1423. As a direct and proximate cause of Toyota's design, manufacture,
12 assembly, marketing, and sales of the Defective Vehicles, Plaintiffs have sustained
13 and will continue to sustain the loss of use of his/her vehicle, economic losses and
14 consequential damages, and are therefore entitled to compensatory relief according
15 to proof, and entitled to a declaratory judgment that Toyota is liable to Plaintiffs for
16 breach of its duty to design, manufacture, assemble, market, and sell a safe product,
17 fit for its reasonably intended use. Plaintiffs allege that the unintended acceleration
18 events are the type of occurrences which would not happen in the absence of a
19 defective product. Plaintiffs allege the application of *res ipsa loquitur* under
20 Louisiana Products Liability Law.
21
22

23 **COUNT II**

24 **REDHIBITION**

25 **(LA. Civ. Code Art. 2520, *et seq.* and 2545)**

26 1424. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 1425. Plaintiffs allege that Toyota defectively designed, manufactured, sold or
2 otherwise placed in the stream of commerce vehicles that are defective.

3 1426. Plaintiffs allege that the unintended acceleration events are the type of
4 occurrences which would not happen in the absence of a defective product.
5 Plaintiffs allege the application of *res ipsa loquitur* under Louisiana Products
6 Liability Law.
7

8 1427. Plaintiffs allege that Defendants have known about safety hazards that
9 result in unexpected accelerations of its vehicles for a number of years and has failed
10 to adequately address those safety concerns.

11 1428. Defendants, as manufacturer of the Defective Vehicles, are responsible
12 for damages caused by the failure of its product to conform to well-defined
13 standards. In particular, the vehicles contain vices or defects which rendered them
14 useless or their use so inconvenient and unsafe that a reasonable buyer would not
15 have purchased them. Defendants manufactured, sold and promoted the vehicles and
16 placed the vehicles into the stream of commerce. Under Louisiana Law, the seller
17 and manufacturer warrants the buyer against redhibitory defects or vices in the things
18 sold. LA. CODE CIV. P. Art. 2520. The vehicles as sold and promoted by Defendants
19 possessed redhibitory defects because they were not manufactured and marketed in
20 accordance with industry standards and/or were unreasonably dangerous as described
21 above, which rendered the vehicles useless or their use so inconvenient and unsafe
22 that it must be presumed that a buyer would not have bought the vehicles had he/she
23 known of the defect. Pursuant to LA. CODE CIV. P. Art. 2520, Plaintiffs are entitled
24 to obtain a rescission of the sale of the subject product.
25
26
27
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1 1429. The vehicles alternatively possess redhibitory defects because the
2 vehicles were not manufactured and marketed in accordance with industry standards
3 and/or were unreasonably dangerous as described above, which diminished the value
4 of the vehicles so that it must be presumed that a reasonable buyer would still have
5 bought the vehicles, but for a lesser price, had the redhibitory defects been disclosed.
6 In this instance, Plaintiffs are entitled to a reduction of the purchase price.
7

8 1430. As the manufacturer of the vehicle, under Louisiana Law, defendants
9 are deemed to know that the vehicle contained redhibitory defects pursuant to LA.
10 CODE CIV. P. Art. 2545. Toyota is liable as a bad faith seller for selling a defective
11 product with knowledge of defects and thus is liable to Plaintiffs for the price of the
12 subject product, with interest from the purchase date, as well as reasonable expenses
13 occasioned by the sale of the subject product, and attorney's fees.
14

15 1431. Due to the defects and redhibitory vices in the Toyotas sold to Plaintiffs,
16 they have suffered damages under Louisiana Law.

17 **COUNT III**
18 **BREACH OF IMPLIED WARRANTY OF FITNESS**
19 **FOR ORDINARY USE**

20 **(La. Civ. Code Art. 2524)**

21 1432. Plaintiffs reallege and incorporate by reference all paragraphs as though
22 fully set forth herein.

23 1433. At all relevant times, Toyota marketed, sold and distributed the
24 automobile for use by Plaintiffs, knew of the use for which the Defective Vehicles
25 were intended, and impliedly warranted them to be fit for ordinary use.
26
27
28

1 1434. The Defective Vehicles, when sold, were defective, unmerchantable,
2 and unfit for ordinary use.

3 1435. The Defective Vehicles contain vices or defects which render them
4 either absolutely useless or render their use inconvenient, imperfect, and unsafe such
5 that Plaintiffs would not have purchased the Defective Vehicles had they known of
6 the vices or defects.

7
8 1436. The damages in question arose from the reasonably anticipated use of
9 the product in question.

10 1437. Toyota breached the implied warranties of merchantability and fitness
11 for ordinary use when the Defective Vehicles were sold to Plaintiffs because they
12 have a tendency to accelerate suddenly and dangerously out of the driver's control
13 and lack a fail-safe mechanism to override unintended acceleration.

14
15 1438. As a direct and proximate cause of Toyota's breach of the implied
16 warranties of merchantability and fitness for ordinary use, Plaintiffs and the Class
17 have suffered injuries and damages.

18 **COUNT IV**
19 **NEGLIGENCE**
20 **(La. Civ. Code Art. 2315)**

21
22 1439. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 1440. Toyota had a duty to Plaintiffs to provide a safe product in design and
25 manufacture, to notify NHTSA, and to warn NHTSA of the defective nature of the
26 Defective Vehicles.

1 1441. Toyota breached its duty of reasonable care to Plaintiffs by designing
2 the Defective Vehicles in such a manner that they are prone to accelerate suddenly
3 and dangerously out of the driver's control and lack a fail-safe mechanism to
4 override unintended acceleration.

5 1442. Toyota breached its duty of reasonable care to Plaintiffs by
6 manufacturing and/or assembling the Defective Vehicles in such a manner that they
7 are prone accelerate suddenly and dangerously out of the driver's control and lack a
8 fail-safe mechanism to override unintended acceleration.

9 1443. Toyota breached its duty of reasonable care to Plaintiffs by failing to
10 recall the Defective Vehicles at the earliest possible date.

11 1444. Toyota breached its duty of reasonable care to Plaintiffs by failing to
12 exercise due care under the circumstances.

13 1445. As a direct and proximate result of Toyota's negligence as set forth in
14 the preceding paragraphs, Plaintiffs have sustained and will continue to sustain the
15 loss of use of their vehicles, economic losses, consequential damages and other
16 damages and are entitled to compensatory damages, and equitable and declaratory
17 relief according to proof.

18 1446. Toyota's egregious misconduct alleged above warrants the imposition
19 of punitive damages against Toyota to prevent such future behavior.

1 MAINE

2 COUNT I

3 VIOLATION OF MAINE UNFAIR TRADE PRACTICES ACT

4 (Me. Rev. Stat. Ann. tit. 5 § 205-A, *et seq.*)

5 1447. Plaintiffs reallege and incorporate by reference all paragraphs as though
6 fully set forth herein.

7 1448. The Maine Unfair Trade Practices Act (“UTPA”) makes unlawful
8 “[u]nfair methods of competition and unfair or deceptive acts or practices in the
9 conduct of any trade or commerce. . . .” per ME. REV. STAT. ANN. TIT. 5 § 207.

10 1449. The advertising and sale of motor vehicles by Toyota constitutes “trade
11 or commerce” within the meaning of UTPA per ME. REV. STAT. ANN. TIT. 5
12 § 206(3).
13

14 1450. In the course of Toyota’s business, it willfully failed to disclose and
15 actively concealed the dangerous risk of throttle control failure and the lack of
16 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
17 described above. This was a deceptive act in that Toyota represented that Defective
18 Vehicles have characteristics, uses, benefits, and qualities which they do not have;
19 represented that Defective Vehicles are of a particular standard and quality when
20 they are not; and advertised Defective Vehicles with the intent not to sell them as
21 advertised. Toyota knew or should have known that its conduct violated the UTPA.
22

23 1451. Toyota engaged in a deceptive trade practice when it failed to disclose
24 material information concerning the Toyota vehicles which was known to Toyota at
25 the time of the sale. Toyota deliberately withheld the information about the vehicles’
26
27
28

1 propensity for rapid, uncontrolled acceleration in order to ensure that consumers
2 would purchase its vehicles and to induce the consumer to enter into a transaction.

3 1452. The information withheld was material in that it was information that
4 was important to consumers and likely to affect their choice of, or conduct regarding,
5 the purchase of their cars. Toyota's withholding of this information was likely to
6 mislead consumers acting reasonably under the circumstances. The propensity of the
7 Toyotas for rapid, uncontrolled acceleration and their lack of a fail-safe mechanism
8 were material to Plaintiffs and the Class. Had Plaintiffs and the Class known that
9 their Toyotas had these serious safety defects, they would not have purchased their
10 Toyotas.
11

12 1453. Toyota's conduct has caused or is to cause a substantial injury that is
13 not reasonably avoided by consumers, and the harm is not outweighed by a
14 countervailing benefit to consumers or competition
15

16 1454. As a result of Toyota's deceptive and unfair practices, Plaintiffs and the
17 Class have suffered loss of money or property. Plaintiffs and the Class overpaid for
18 their vehicles and did not receive the benefit of their bargain. The value of their
19 Toyotas have diminished now that the safety issues have come to light, and Plaintiffs
20 and the Class own vehicles that are not safe.
21

22 1455. Plaintiffs are entitled to actual damages, restitution and such other
23 equitable relief, including an injunction, as the Court determines to be necessary and
24 proper.
25

26 1456. Pursuant to ME. REV. STAT. ANN. TIT. 5 § 213(3), Plaintiffs will mail a
27 copy of the complaint to Maine's Attorney General.
28

COUNT II

BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY

(Me. Rev. Stat. Ann. tit. 11 § 2-314)

1457. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1458. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

1459. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

1460. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1461. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1462. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT III
REVOCATION OF ACCEPTANCE
(Me. Rev. Stat. Ann. tit. 11 § 2-608)

1463. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1464. Plaintiffs identified above demanded revocation and the demands were refused.

1465. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

1466. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

1467. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

1468. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

1469. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 1470. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 1471. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 1472. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 1473. Consequently, Plaintiffs and the Class are entitled to revoke their
24 acceptances, receive all payments made to Toyota, and to all incidental and
25 consequential damages, including the costs associated with purchasing safer
26 vehicles, and all other damages allowable under law, all in amounts to be proven at
27 trial.
28

COUNT IV
BREACH OF CONTRACT
(Based On Maine Law)

1474. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1475. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Maine's Commercial Code, Plaintiffs plead in the alternative under common law contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

1476. Toyota breached this contractual obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

1477. As a direct and proximate result of Defendants' breach of contract warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT V
UNJUST ENRICHMENT
(Based On Maine Law)

1478. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 1479. Toyota had knowledge of the safety defects in its vehicles, which it
2 failed to disclose to Plaintiffs and the Class.

3 1480. As a result of their wrongful and fraudulent acts and omissions, as set
4 forth above, pertaining to the design defect of their vehicles and the concealment of
5 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
6 value and Toyota obtained monies which rightfully belong to Plaintiffs.

7
8 1481. Toyota appreciated, accepted and retained the non-gratuitous benefits
9 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
10 paid a higher price for vehicles which actually had lower values. It would be
11 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

12
13 1482. Plaintiffs, therefore, are entitled to restitution and seek an order
14 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
15 interest.

16 **MARYLAND**

17 **COUNT I**

18 **VIOLATIONS OF THE MARYLAND CONSUMER PROTECTION ACT**
19 **(Md. Code Com. Law § 13-101, *et seq.*)**

20 1483. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.

22
23 1484. Plaintiffs are persons within the meaning of the Maryland Consumer
24 Protection Act (the "Act") for all purposes therein.

25 1485. Toyota is a person within the meaning of the Act for all purposes
26 therein.

1 1486. The false, deceptive and misleading statements and representations
2 made by Toyota alleged above and below are Unfair and Deceptive Trade Practices
3 within the meaning of the Act.

4 1487. Toyota participated in unfair or deceptive acts or practices that violated
5 the Act, as described above and below, and those unfair and deceptive trade practices
6 occurred or were committed in the course, vocation or occupation of Defendants'
7 businesses. Toyota engaged in the unfair and deceptive trade practices and each are
8 directly liable for these violations of law.
9

10 1488. The Unfair and Deceptive Trade Practices as alleged above and below
11 significantly impact the public as actual or potential customers of Toyota.
12

13 1489. By failing to disclose and actively concealing the dangerous risk of
14 throttle control failure and the lack of adequate fail-safe mechanisms in Defective
15 Vehicles equipped with ETCS, Toyota engaged in deceptive business practices
16 prohibited by the Act, including, but not limited to, (1) representing that Defective
17 Vehicles have characteristics, uses, benefits, and qualities which they do not have,
18 (2) representing that Defective Vehicles are of a particular standard, quality, and
19 grade when they are not, (3) advertising Defective Vehicles with the intent not to sell
20 them as advertised; (4) representing that a transaction involving Defective Vehicles
21 confers or involves rights, remedies, and obligations which it does not, and
22 (5) representing that the subject of a transaction involving Defective Vehicles has
23 been supplied in accordance with a previous representation when it has not.
24

25 1490. As alleged above, Toyota made numerous material statements about the
26 safety and reliability of Defective Vehicles that were either false or misleading. Each
27
28

1 of these statements contributed to the deceptive context of Toyota's unlawful
2 advertising and representations as a whole.

3 1491. Toyota's unfair or deceptive acts or practices were likely to and did in
4 fact deceive reasonable consumers, including Plaintiffs, about the true safety and
5 reliability of Defective Vehicles.
6

7 1492. As a direct and proximate result of their unfair and deceptive business
8 practices, and violations of the Act detailed above, Toyota caused actual damages,
9 injuries, and losses to Plaintiffs and, if not stopped, will continue to harm Plaintiffs.
10 Plaintiffs currently own or lease, or within the class period have owned or leased,
11 Defective Vehicles that are defective and inherently unsafe. ETCH defects and the
12 resulting unintended acceleration incidents have caused the value of Defective
13 Vehicles to plummet.
14

15 1493. Plaintiffs are entitled to all damages permitted by M.R.S § 13-101,
16 *et seq.*, including actual damages sustained, civil penalties, attorneys' fees, and costs
17 of this action. Also, the State of Maryland is entitled to statutory penalties from
18 defendants for each violation of the Act.
19

20 **COUNT II**
21 **BREACH OF EXPRESS WARRANTY**
22 **(Md. Code Com. Law § 2-313)**

23 1494. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1495. Toyota is and was at all relevant times a merchant as defined by the
26 Uniform Commercial Code.
27
28

1 1496. In the course of selling its vehicles, Toyota expressly warranted in
2 writing that the Vehicles were covered by a Basic Warranty.

3 1497. Toyota breached the express warranty to repair and adjust to correct
4 defects in materials and workmanship of any part supplied by Toyota. Toyota has
5 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
6 materials and workmanship defects.
7

8 1498. In addition to this Basic Warranty, Toyota expressly warranted several
9 attributes, characteristics and qualities, as set forth above.

10 1499. These warranties are only a sampling of the numerous warranties that
11 Toyota made relating to safety, reliability and operation, which are more fully
12 outlined in Section IV.A., *supra*. Generally these express warranties promise
13 heightened, superior, and state-of-the-art safety, reliability, performance standards,
14 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
15 advertisements, in Toyota's "e brochures," and in uniform statements provided by
16 Toyota to be made by salespeople. These affirmations and promises were part of the
17 basis of the bargain between the parties.
18

19 1500. These additional warranties were also breached because the Defective
20 Vehicles were not fully operational, safe, or reliable (and remained so even after the
21 problems were acknowledged and a recall "fix" was announced), nor did they
22 comply with the warranties expressly made to purchasers or lessees. Toyota did not
23 provide at the time of sale, and has not provided since then, vehicles conforming to
24 these express warranties.
25

26 1501. Furthermore, the limited warranty of repair and/or adjustments to
27 defective parts, fails in its essential purpose because the contractual remedy is
28

1 insufficient to make the Plaintiffs and the Class whole and because the Defendants
2 have failed and/or have refused to adequately provide the promised remedies within
3 a reasonable time.

4 1502. Accordingly, recovery by the Plaintiffs is not limited to the limited
5 warranty of repair or adjustments to parts defective in materials or workmanship, and
6 Plaintiffs seek all remedies as allowed by law.

7 1503. Also, as alleged in more detail herein, at the time that Defendants
8 warranted and sold the vehicles they knew that the vehicles did not conform to the
9 warranties and were inherently defective, and Defendants wrongfully and
10 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
11 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
12 and/or fraudulent pretenses.

13 1504. Moreover, many of the damages flowing from the Defective Vehicles
14 cannot be resolved through the limited remedy of “replacement or adjustments,” as
15 those incidental and consequential damages have already been suffered due to
16 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
17 continued failure to provide such limited remedy within a reasonable time, and any
18 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
19 Plaintiffs and the Class whole.

20 1505. Finally, due to the Defendants’ breach of warranties as set forth herein,
21 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
22 in MD. CODE COM. LAW § 2-608 for a revocation of acceptance of the goods, and for
23 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently.

1 1506. Toyota was provided notice of these issues by numerous complaints
2 filed against it, including the instant complaint, and by numerous individual letters
3 and communications sent by Plaintiffs and the Class before or within a reasonable
4 amount of time after Toyota issued the recall and the allegations of vehicle defects
5 became public.
6

7 1507. As a direct and proximate result of Toyota's breach of express
8 warranties, Plaintiffs and the Class have been damaged in an amount to be
9 determined at trial.

10 **COUNT III**
11 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
12 **(Md. Code Com. Law § 2-314)**

13 1508. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 1509. Toyota is and was at all relevant times a merchant with respect to motor
17 vehicles.

18 1510. A warranty that the Defective Vehicles were in merchantable condition
19 was implied by law in the instant transactions.
20

21 1511. These vehicles, when sold and at all times thereafter, were not in
22 merchantable condition and are not fit for the ordinary purpose for which cars are
23 used. Specifically, the Defective Vehicles are inherently defective in that there are
24 defects in the vehicle control systems that permit sudden unintended acceleration to
25 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
26 such SUA events, nor do they have a brake-override; and the ETCS system was not
27 adequately tested.
28

1 1519. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
2 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
3 paid.

4 1520. Plaintiffs and the Class would suffer economic hardship if they returned
5 their vehicles but did not receive the return of all payments made by them. Because
6 Toyota is refusing to acknowledge any revocation of acceptance and return
7 immediately any payments made, Plaintiffs and the Class have not re-accepted their
8 Defective Vehicles by retaining them.

9
10 1521. These defects and nonconformities substantially impaired the value of
11 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
12 basic sources. First, the Defective Vehicles fail in their essential purpose because
13 they present an unreasonably high risk of sudden unintended acceleration (a risk
14 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
15 Second, the repair and adjust warranty has failed of its essential purpose because
16 Toyota cannot repair or adjust the Defective Vehicles.

17
18 1522. Plaintiffs and the Class provided notice of their intent to seek revocation
19 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
20 (and many Class members) have requested that Toyota accept return of their vehicles
21 and return all payments made. Plaintiffs on behalf of themselves and the Class
22 hereby demand revocation and tender their Defective Vehicles.

23
24 1523. Plaintiffs and the Class would suffer economic hardship if they returned
25 their vehicles but did not receive the return of all payments made by them. Because
26 Toyota is refusing to acknowledge any revocation of acceptance and return
27 immediately any payments made, Plaintiffs and the Class have not re-accepted their
28

1 Defective Vehicles by retaining them, as they must continue using them due to the
2 financial burden of securing alternative means of transport for an uncertain and
3 substantial period of time.

4 1524. Finally, due to the Defendants' breach of warranties as set forth herein,
5 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
6 in MD. CODE COM. LAW § 2-608, for a revocation of acceptance of the goods, and for
7 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
8 owned.
9

10 1525. Consequently, Plaintiffs and the Class are entitled to revoke their
11 acceptances, receive all payments made to Toyota, and to all incidental and
12 consequential damages, including the costs associated with purchasing safer
13 vehicles, and all other damages allowable under law, all in amounts to be proven at
14 trial.
15

16 **COUNT V**

17 **BREACH OF CONTRACT/Common Law Warranty**

18 **(Based On Maryland Law)**

19 1526. Plaintiffs reallege and incorporate by reference all paragraphs as though
20 fully set forth herein.

21 1527. To the extent Toyota's repair or adjust commitment is deemed not to be
22 a warranty under the Maryland Code, Plaintiffs plead in the alternative under
23 common law warranty and contract law. Toyota limited the remedies available to
24 Plaintiffs and the Class to just repairs and adjustments needed to correct defects in
25 materials or workmanship of any part supplied by Toyota, and/or warranted the
26 quality or nature of those services to Plaintiffs.
27
28

1529. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

1530. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1532. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

1 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
2 were material because they directly impact the safety of the Defective Vehicles.
3 Whether or not a vehicle accelerates only at the driver's command, and whether a
4 vehicle will stop or not upon application of the brake by the driver, are material
5 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
6 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
7

8 1534. Defendants actively concealed and/or suppressed these material facts, in
9 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
10 Defective Vehicles at a higher price for the vehicles, which did not match the
11 vehicles' true value.
12

13 1535. Defendants still have not made full and adequate disclosure and
14 continue to defraud Plaintiffs and the Class.

15 1536. Plaintiffs and the Class were unaware of these omitted material facts
16 and would not have acted as they did if they had known of the concealed and/or
17 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
18 in exclusive control of the material facts and such facts were not known to the public
19 or the Class.
20

21 1537. As a result of the concealment and/or suppression of the facts, Plaintiffs
22 and the Class sustained damage. For those Plaintiffs and the Class who elect to
23 affirm the sale, these damages, include the difference between the actual value of
24 that which Plaintiffs and the Class paid and the actual value of that which they
25 received, together with additional damages arising from the sales transaction,
26 amounts expended in reliance upon the fraud, compensation for loss of use and
27 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
28

1 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
2 restitution and consequential damages.

3 1538. Defendants' acts were done maliciously, oppressively, deliberately, with
4 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
5 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
6 punitive damages in an amount sufficient to deter such conduct in the future, which
7 amount is to be determined according to proof.

9 **COUNT VII**
10 **NEGLIGENCE**
11 **(Based On Maryland Law)**

12 1539. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 1540. Toyota had a duty to Plaintiffs and the Class to provide a safe product in
15 design and manufacture, to notify NHTSA, and to warn NHTSA of the heightened
16 propensity of the Defective Vehicles to unexpectedly accelerate out of the driver's
17 control and lack a fail-safe mechanism to overcome unintended acceleration.

18 1541. Toyota breached its duty of reasonable care to Plaintiffs and the Class
19 by designing the Defective Vehicles in such a manner that they have a heightened
20 propensity to suddenly and unexpectedly accelerate out of the driver's control and
21 lack a fail-safe mechanism to overcome unintended acceleration.
22

23 1542. Toyota breached its duty of reasonable care to Plaintiffs and the Class
24 by manufacturing and/or assembling the Defective Vehicles in such a manner that
25 they were prone to suddenly and unexpectedly accelerate out of the driver's control
26 and lack a fail-safe mechanism to overcome unintended acceleration.
27
28

1543. Toyota breached its duty of reasonable care to Plaintiffs and the Class by failing to recall the Defective Vehicles at the earliest possible date when they knew that sudden unexpected acceleration and lack a fail-safe mechanism to overcome unintended acceleration were problems.

1544. Toyota breached its duty of reasonable care to Plaintiffs and the Class by failing to exercise due care under the circumstances.

1545. As a direct and proximate result of Toyota's negligence as set forth in the preceding paragraphs, Plaintiffs and the Class have sustained and will continue to sustain the loss of use of their vehicles, economic losses, consequential damages and other damages and are entitled to compensatory damages and equitable and declaratory relief according to proof.

1546. Plaintiffs and the Class demand judgment against Toyota for negligence as prayed below.

COUNT VIII

STRICT PRODUCTS LIABILITY – DESIGN DEFECT

(Based On Maryland Law)

1547. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1548. At all times relevant hereto, Toyota was engaged in the business of designing, manufacturing, assembling, promoting, advertising, selling, and distributing Toyota vehicles in the United States, including, but not limited to, the Defective Vehicles.

1549. Toyota knew and expected for the Defective Vehicles to eventually be sold to and operated by consumers and/or eventual owners of the Defective Vehicles,

1 including Plaintiffs and the Class. Consequently, Plaintiffs and the Class were
2 foreseeable users of the products which Toyota manufactured.

3 1550. The Defective Vehicles reached Plaintiffs and the Class without
4 substantial change in condition from the time they were manufactured by Toyota.
5

6 1551. The propensity of the Defective Vehicles to suddenly and unexpectedly
7 accelerate out of their driver's control without a fail-safe mechanism to overcome
8 unintended acceleration could not have been contemplated by any reasonable person
9 expected to operate the Defective Vehicles, and for that reason, presented an
10 unreasonably dangerous situation for foreseeable users of the Defective Vehicles
11 even though the Defective Vehicles were operated by foreseeable users in a
12 reasonable manner.
13

14 1552. Toyota should have reasonably foreseen that the dangerous conditions
15 of the Defective Vehicles suddenly and unexpectedly accelerating without a fail-safe
16 mechanism to overcome unintended acceleration would subject Plaintiffs and the
17 Class to harm.

18 1553. As a result of these defective designs, the Defective Vehicles are
19 unreasonably dangerous.
20

21 1554. Plaintiffs and the Class have used the Defective Vehicles reasonably
22 and as intended, to the fullest degree possible given their defective nature, and,
23 nevertheless, have suffered damages through no fault of their own.

24 1555. Safer, alternative designs existed for the Defective Vehicles.

25 1556. As a direct and proximate result of Toyota's design, manufacture,
26 assembly, marketing, and sales of the Defective Vehicles, Plaintiffs and the Class
27 have sustained and will continue to sustain the loss of the use of their vehicles,
28

1 economic losses, and consequential damages, and are, therefore, entitled to
2 compensatory relief according to proof, and entitled to a declaratory judgment that
3 Toyota is liable to Plaintiffs and the Class for breach of its duty to design,
4 manufacture, assemble, market, and sell a safe product, fit for its reasonably intended
5 use. Plaintiffs and the Class are therefore entitled to equitable relief as described
6 below.
7

8 1557. Plaintiffs and the Class demand judgment against Toyota for design
9 defects as prayed for below.

10 **COUNT IX**
11 **STRICT PRODUCTS LIABILITY – DEFECTIVE MANUFACTURING**
12 **(Based On Maryland Law)**

13 1558. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 1559. Toyota is the manufacturer, designer, distributor, seller, or supplier of
17 the Defective Vehicles.

18 1560. The Defective Vehicles manufactured, designed, sold, distributed,
19 supplied and/or placed in the stream of commerce by Toyota were defective in their
20 manufacture and construction such that they were unreasonably dangerous, were not
21 fit for the ordinary purposes for which they were intended, and/or did not meet the
22 reasonable expectations of any consumer.
23

24 1561. The Defective Vehicles manufactured, designed, sold, distributed,
25 supplied and/or placed in the stream of commerce by Toyota, were defective in their
26 manufacture and construction as described at the time they left Toyota's control.
27
28

1562. The Defective Vehicles are unreasonably dangerous due to their defective manufacture.

1563. As a direct and proximate result of Plaintiffs' purchase and use of the Defective Vehicles as manufactured, designed, sold, supplied and introduced into the stream of commerce by Toyota, Plaintiffs and the Class suffered economic losses, and will continue to suffer such damages and economic losses in the future.

1564. Plaintiffs demand judgment against Toyota for manufacturing defects as prayed for below.

COUNT X

**STRICT PRODUCTS LIABILITY –
DEFECT DUE TO NONCONFORMANCE WITH REPRESENTATIONS**

(Based On Maryland Law)

1565. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1566. Toyota is the manufacturer, designer, distributor, seller, or supplier of the Defective Vehicles, and Toyota made representations regarding the character or quality of the Defective Vehicles.

1567. The Defective Vehicles manufactured and supplied by Toyota were defective in that, when they left the hands of Toyota, they did not conform to the representations made by Toyota concerning the Defective Vehicles.

1568. Plaintiffs and the Class justifiably relied upon Toyota's representations regarding the Defective Vehicles when they purchased and used the Defective Vehicles.

1 1569. As a direct and proximate result of their reliance on Toyota's
2 representations regarding the character and quality of the Defective Vehicles,
3 Plaintiffs and the Class suffered damages and economic losses, and will continue to
4 suffer such damages and economic losses in the future.

5
6 1570. Plaintiffs demand judgment against Toyota for manufacturing defects as
7 prayed for below.

8 **COUNT XI**
9 **UNJUST ENRICHMENT**
10 **(Based On Maryland Law)**

11 1571. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1572. As a result of their wrongful and fraudulent acts and omissions, as set
14 forth above, pertaining to the design defect of their vehicles and the concealment of
15 the defect, Defendants charged a higher price for their vehicles than the vehicles'
16 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

17
18 1573. Defendants knowingly enjoyed the benefit of increased financial gains,
19 to the detriment of Plaintiffs and the Class, who paid a higher price for vehicles
20 which actually had lower values. It would be inequitable and unjust for Defendants
21 to retain these wrongfully obtained profits.

22
23 1574. Plaintiffs, therefore, are entitled to restitution and seek and order
24 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
25 interest.

MASSACHUSETTS

COUNT I

**VIOLATION OF THE MASSACHUSETTS
CONSUMER PROTECTION ACT**

(Chapter 93A)

1575. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1576. The conduct of Toyota as set forth herein constitutes unfair and deceptive acts or practices in violation of the Massachusetts Consumer Protection Act, Mass. Gen. L. ch. 93A, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and remedy, and its misrepresentations and omissions regarding the safety and reliability of its vehicles, which misrepresentations and omissions possessed the tendency to deceive.

1577. Toyota engages in the conduct of trade or commerce and the misconduct alleged herein occurred in trade or commerce.

1578. In satisfaction of MASS. GEN. LAWS CH. 93A, § 9(3), Plaintiffs have made demand on Toyota more than 30 days prior to this filing by numerous letters sent by Plaintiffs and the Class. These letters asserted that rights of consumers as claimants had been violated, described the unfair and deceptive acts committed by Toyota, and specified the injuries that Plaintiffs and the Class have suffered and the relief they seek. Thus, these letters satisfy section 9(3).

1579. As a result of Defendant's unfair and deceptive acts or practices in violation of the Massachusetts Consumer Protection Act, MASS. GEN. L. CH. 93A,

1 Plaintiffs suffered injury as described herein. Plaintiffs overpaid for their Defective
2 Vehicles and did not receive the benefit of their bargain, and their vehicles have
3 suffered a diminution in value.

4
5 **COUNT II**
6 **BREACH OF EXPRESS WARRANTY**
7 **(ALM GL ch. 106, § 2-313)**

8 1580. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1581. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles.

12 1582. In the course of selling its vehicles, Toyota expressly warranted in
13 writing that the Vehicles were covered by a Basic Warranty.

14 1583. Toyota breached the express warranty to repair and adjust to correct
15 defects in materials and workmanship of any part supplied by Toyota. Toyota has
16 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
17 materials and workmanship defects.

18 1584. In addition to this Basic Warranty, Toyota expressly warranted several
19 attributes, characteristics and qualities, as set forth above.

20 1585. These warranties are only a sampling of the numerous warranties that
21 Toyota made relating to safety, reliability and operation, which are more fully
22 outlined in Section IV.A., *supra*. Generally these express warranties promise
23 heightened, superior, and state-of-the-art safety, reliability, performance standards,
24 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
25 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
26
27
28

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 1586. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 1587. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 1588. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 1589. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses.
26

27 1590. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 1591. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in ALM GL ch. 106, § 2-608, for a revocation of acceptance of the goods, and for a
10 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
11 owned.
12

13 1592. Toyota was provided notice of these issues by numerous complaints
14 filed against it, including the instant complaint, and by numerous individual letters
15 and communications sent by Plaintiffs and the Class before or within a reasonable
16 amount of time after Toyota issued the recall and the allegations of vehicle defects
17 became public.
18

19 1593. As a direct and proximate result of Toyota's breach of express
20 warranties, Plaintiffs and the Class have been damaged in an amount to be
21 determined at trial.
22

23 **COUNT III**

24 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

25 **(ALM GL ch. 106, § 2-314)**
26

27 1594. Plaintiffs reallege and incorporate by reference all paragraphs as though
28 fully set forth herein.

1 1595. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles.

3 1596. A warranty that the Defective Vehicles were in merchantable condition
4 is implied by law in the instant transactions.
5

6 1597. These vehicles, when sold and at all times thereafter, were not in
7 merchantable condition and are not fit for the ordinary purpose for which cars are
8 used. Specifically, the Defective Vehicles are inherently defective in that there are
9 defects in the vehicle control systems that permit sudden unintended acceleration to
10 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
11 such SUA events, nor do they have a brake-override; and the ETCS system was not
12 adequately tested.
13

14 1598. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 1599. As a direct and proximate result of Toyota's breach of the warranties of
21 merchantability, Plaintiffs and the Class have been damaged in an amount to be
22 proven at trial.

23 **COUNT IV**
24 **REVOCATION OF ACCEPTANCE**
25 **(ALM GL ch. 106, § 2-608)**

26 1600. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 1601. Plaintiffs identified above demanded revocation and the demands were
2 refused.

3 1602. Plaintiffs and the Class had no knowledge of such defects and
4 nonconformities, were unaware of these defects, and reasonably could not have
5 discovered them when they purchased or leased their automobiles from Toyota. On
6 the other hand, Toyota was aware of the defects and nonconformities at the time of
7 sale and thereafter.

9 1603. Acceptance was reasonably induced by the difficulty of discovery of the
10 defects and nonconformities before acceptance.

11 1604. There has been no change in the condition of Plaintiffs' vehicles not
12 caused by the defects and nonconformities.

14 1605. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
15 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
16 paid.

17 1606. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them.

23 1607. These defects and nonconformities substantially impaired the value of
24 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
25 basic sources. First, the Defective Vehicles fail in their essential purpose because
26 they present an unreasonably high risk of sudden unintended acceleration (a risk
27 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
28

1 Second, the repair and adjust warranty has failed of its essential purpose because
2 Toyota cannot repair or adjust the Defective Vehicles.

3 1608. Plaintiffs and the Class provided notice of their intent to seek revocation
4 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
5 (and many Class members) have requested that Toyota accept return of their vehicles
6 and return all payments made. Plaintiffs on behalf of themselves and the Class
7 hereby demand revocation and tender their Defective Vehicles.
8

9 1609. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them, as they must continue using them due to the
14 financial burden of securing alternative means of transport for an uncertain and
15 substantial period of time.
16

17 1610. Finally, due to the Defendants' breach of warranties as set forth herein,
18 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
19 in ALM GL ch. 106, § 2-608, for a revocation of acceptance of the goods, and for a
20 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
21 owned.
22

23 1611. Consequently, Plaintiffs and the Class are entitled to revoke their
24 acceptances, receive all payments made to Toyota, and to all incidental and
25 consequential damages, including the costs associated with purchasing safer vehicles,
26 and all other damages allowable under law, all in amounts to be proven at trial.
27
28

COUNT V

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On Massachusetts Law)

1612. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1613. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Massachusetts's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

1614. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

1615. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VI

UNJUST ENRICHMENT

(Based On Massachusetts Law)

1616. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 1617. Toyota had knowledge of the safety defects in its vehicles, which it
2 failed to disclose to Plaintiffs and the Class.

3 1618. As a result of their wrongful and fraudulent acts and omissions, as set
4 forth above, pertaining to the design defect of their vehicles and the concealment of
5 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
6 value and Toyota obtained monies which rightfully belong to Plaintiffs.

7
8 1619. Toyota appreciated, accepted and retained the non-gratuitous benefits
9 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
10 paid a higher price for vehicles which actually had lower values. It would be
11 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

12
13 1620. Plaintiffs, therefore, are entitled to restitution and seek an order
14 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
15 interest.

16 **MICHIGAN**
17 **COUNT I**
18 **VIOLATION OF THE MICHIGAN CONSUMER PROTECTION ACT**
19 **(Mich. Comp. Laws § 445.901, *et seq.*)**

20 1621. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.

22
23 1622. Defendants misrepresented the safety of the Defective Vehicles after
24 learning of their defects with the intent that Plaintiffs relied on such representations
25 in their decision regarding the purchase, lease and/or use of the Defective Vehicles.

26 1623. Plaintiffs did, in fact, rely on such representations in their decision
27 regarding the purchase, lease and/or use of the Defective Vehicles.
28

1 1624. Through those misleading and deceptive statements and false promises,
2 Defendants violated the Michigan Consumer Protection Act.

3 1625. The Michigan Consumer Protection Act applies to Defendants'
4 transactions with Plaintiffs because Defendants' deceptive scheme was carried out in
5 Michigan and affected Plaintiffs.
6

7 1626. Defendants also failed to advise NHSTA and the public about what they
8 knew about the sudden and unintended acceleration defects in the Defective
9 Vehicles.

10 1627. Plaintiffs relied on Defendants' silence as to known defects in
11 connection with their decision regarding the purchase, lease and/or use of the
12 Defective Vehicles.
13

14 1628. As a direct and proximate result of Defendants' deceptive conduct and
15 violation of the Michigan Consumer Protection Act, Plaintiffs have sustained and
16 will continue to sustain economic losses and other damages for which they are
17 entitled to compensatory and equitable damages and declaratory relief in an amount
18 to be proven at trial.
19

20 **COUNT II**
21 **BREACH OF EXPRESS WARRANTY**
22 **(Mich. Comp. Laws § 440.2313)**

23 1629. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1630. Defendants expressly warranted – through statements and
26 advertisements described above – that the vehicles were of high quality, and at a
27 minimum, would actually work properly and safely.
28

1 1631. Defendants breached this warranty by knowingly selling to Plaintiffs
2 vehicles with dangerous defects, and which were not of high quality.

3 1632. Plaintiffs have been damaged as a direct and proximate result of the
4 breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were
5 and are worth far less than what the Plaintiffs paid to purchase, which was
6 reasonably foreseeable to Defendants.
7

8 **COUNT III**
9 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
10 **(Mich. Comp. Laws § 440.2314)**

11 1633. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1634. Defendants impliedly warranted that their vehicles were of good and
14 merchantable quality and fit, and safe for their ordinary intended use – transporting
15 the driver and passengers in reasonably safety during normal operation, and without
16 unduly endangering them or members of the public.
17

18 1635. As described above, there were dangerous defects in the vehicles
19 manufactured, distributed, and/or sold by Defendants, which Plaintiffs purchased,
20 including, but not limited to, defects that caused the vehicles to suddenly and
21 unintentionally accelerate, and the lack of safety slow and stop the vehicle when
22 such acceleration occurred.
23

24 1636. These dangerous defects existed at the time the vehicles left
25 Defendants' manufacturing facilities and at the time they were sold to Plaintiffs.
26 Furthermore, because of these dangerous defects, Plaintiffs did not receive the
27 benefit of their bargain and the vehicles have suffered a diminution in value.
28

1 1637. These dangerous defects were the direct and proximate cause of
2 damages to the Plaintiffs.

3 **MINNESOTA**
4 **COUNT I**
5 **VIOLATION OF MINNESOTA FALSE STATEMENT**
6 **IN ADVERTISING STATUTE**
7 **(Minn. Stat. §§ 325F.67 *et seq.*)**

8 1638. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1639. Defendants produced and published advertisements and deceptive and
11 misleading statements on the safety and reliability of the Defective Vehicles, even
12 after learning of their defects, with the intent to sell the Defective Vehicles.
13

14 1640. Defendants continue to represent or otherwise disseminate misleading
15 information about the defect and cause of the defect with the intent to induce the
16 public to buy the Defective Vehicles.

17 1641. Defendants concealed their deceptive practices in order to increase the
18 sale of and profit from the Defective Vehicles.
19

20 1642. Defendants violated the Minnesota False Statements in Advertising Act,
21 MINN. STAT. § 325F.67, *et seq.*, by publicly misrepresenting safety of the Defective
22 Vehicles, including the cause of the sudden and unintended acceleration problem,
23 both prior and subsequent to the various recalls.

24 1643. Defendants also failed to advise the NHTSA and the public about what
25 it knew about the sudden and unintended acceleration.
26
27
28

1 1644. The Minnesota False Statements in Advertising Act applies to
2 Plaintiffs' transactions with Defendants because Defendants' deceptive scheme was
3 carried out in Minnesota and affected Plaintiffs.

4 1645. As a direct and proximate result of Defendants' deceptive, unfair, and
5 fraudulent conduct and violations of MINN. STAT. § 325F.67, *et seq.*, Plaintiffs have
6 sustained and will continue to sustain economic losses and other damages for which
7 they are entitled to compensatory and equitable damages and declaratory relief in an
8 amount to be proven at trial.
9

10 **COUNT II**
11 **VIOLATION OF MINNESOTA UNIFORM DECEPTIVE TRADE**
12 **PRACTICES ACT**

13 **(Minn. Stat. § 325D.43-48, *et seq.*)**

14 1646. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein

16 1647. Defendants engaged in – and continue to engage in – conduct that
17 violates the Minnesota Deceptive Trade Practices Act, MINN. STAT. § 325D.44, *et*
18 *seq.* The violations include the following:

19 a. Defendants violated MINN. STAT. § 325D.44(5) by representing
20 the Defective Vehicles as having characteristics, uses, and benefits of safe and
21 mechanically sound vehicles while knowing that the statements were false and the
22 Defective Vehicles contained defects;
23

24 b. Defendants violated MINN. STAT. § 325D.44(7) by representing
25 the Defective Vehicles as a non-defective product of a particular standard, quality, or
26
27
28

1 grade while knowing the statements were false and the Defective Vehicles contained
2 defects;

3 c. Defendants violated MINN. STAT. § 325D.44(9) by advertising,
4 marketing, and selling the Defective Vehicles as reliable and without a known defect
5 while knowing those claims were false; and
6

7 d. Defendants violated MINN. STAT. § 325D.44(13) by creating a
8 likelihood of confusion and/or misrepresenting the safety of the Defective Vehicles.

9 1648. Defendants' deceptive scheme was carried out in Minnesota and
10 affected Plaintiffs.

11 1649. Defendants also failed to advise the NHSTA and the public about what
12 it knew about the sudden and unintended acceleration.
13

14 1650. As a direct and proximate result of Defendants' deceptive conduct and
15 violation of MINN. STAT. § 325D.44, *et seq.*, Plaintiffs have sustained and will
16 continue to sustain economic losses and other damages for which they are entitled to
17 compensatory and equitable damages and declaratory relief in an amount to be
18 proven at trial.
19

20 **COUNT III**

21 **VIOLATION OF MINNESOTA PREVENTION OF
22 CONSUMER FRAUD ACT**

23 **(Minn. Stat. § 325F.68, *et seq.*)**

24 1651. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.
26
27
28

1 1652. Defendants misrepresented the safety of the Defective Vehicles after
2 learning of their defects with the intent that Plaintiffs relied on such representations
3 in their decision regarding the purchase, lease and/or use of the Defective Vehicles.

4 1653. Plaintiffs did, in fact, rely on such representations in their decision
5 regarding the purchase, lease and/or use of the Defective Vehicles.
6

7 1654. Through these misleading and deceptive statements and false promises,
8 Defendants violated MINN. STAT. § 325F.69.

9 1655. The Minnesota Prevention of Consumer Fraud Act applies to
10 Defendants' transactions with Plaintiffs because Defendants' deceptive scheme was
11 carried out in Minnesota and affected Plaintiffs.
12

13 1656. Defendants also failed to advise the NHSTA and the public about what
14 they knew about the sudden and unintended acceleration defects in the Defective
15 Vehicles.

16 1657. Plaintiffs relied on Defendants' silence as to known defects in
17 connection with their decision regarding the purchase, lease and/or use of the
18 Defective Vehicles.
19

20 1658. As a direct and proximate result of Defendants' deceptive conduct and
21 violation of MINN. STAT. § 325F.69, Plaintiffs have sustained and will continue to
22 sustain economic losses and other damages for which they are entitled to
23 compensatory and equitable damages and declaratory relief in an amount to be
24 proven at trial.
25
26
27
28

COUNT IV

**FRAUDULENT MISREPRESENTATION &
FRAUDULENT CONCEALMENT**

(Based On Minnesota Law)

1659. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1660. Toyota intentionally concealed the above-described material safety information, or acted with reckless disregard for the truth, and denied Plaintiffs and the Class information that is highly relevant to their purchasing decision.

1661. Defendants further affirmatively misrepresented to Plaintiffs in advertising and other forms of communication, including standard and uniform material provided with each car, that the vehicles they were selling were new, had no significant defects and would perform and operate properly when driven in normal usage.

1662. The vehicles purchased or leased by Plaintiffs were, in fact, defective, unsafe and unreliable, because the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms.

1663. Toyota had a duty to disclose that these vehicles were defective, unsafe and unreliable in that the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms because Plaintiffs relied on Toyota's material representations that the vehicles they were purchasing were safe and free from defects.

1664. The aforementioned concealment was material because if it had been disclosed Plaintiffs would not have bought or leased the vehicles.

1 1665. The aforementioned representations were material because they were
2 facts that would typically be relied on by a person purchasing or leasing a new motor
3 vehicle. Toyota knew its representations were false because it knew that people had
4 died in its vehicles' unintended acceleration between 2002 and 2009. Toyota
5 intentionally made the false statements in order to sell vehicles.
6

7 1666. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
8 disclose the acceleration problems and Toyota's affirmative assurance that its
9 vehicles were safe and reliable and other similar false statements – in purchasing or
10 leasing Toyota's vehicles.
11

12 1667. As a result of their reliance, Plaintiffs have been injured in an amount to
13 be proven at trial, including, but not limited to, their lost benefit of the bargain and
14 overpayment at the time of purchase and/or the diminished value of their vehicles.
15

16 1668. Defendants' conduct was knowing, intentional, with malice,
17 demonstrated a complete lack of care, and was in reckless disregard for the rights of
18 Plaintiffs. Plaintiffs are therefore entitled to an award of punitive damages.
19

20 **COUNT V**
21 **BREACH OF EXPRESS WARRANTY**
22 **(Minn. Stat. § 325G.19 Express Warranties)**
23

24 1669. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.
26

27 1670. Defendants are and at all relevant times were merchants as defined by
28 the Uniform Commercial Code ("UCC").

1671. Defendants expressly warranted – through uniform statements, "e-
brochures" and advertisements described above – that the vehicles were of high

1 quality, and, at a minimum, would actually work properly and safely. These
2 warranties became part of the basis of the bargain.

3 1672. Defendants breached this warranty by knowingly selling to Plaintiffs
4 vehicles with dangerous defects, and which were not of high quality.

5 1673. Plaintiffs have been damaged as a direct and proximate result of the
6 breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were
7 and are worth far less than what the Plaintiffs paid to purchase, which was
8 reasonably foreseeable to Defendants.

9 1674. Plaintiffs were unaware of these defects and could not have reasonably
10 discovered them when they purchased their vehicles from Toyota.

11 1675. Plaintiffs and the Class are entitled to damages, including the
12 diminished value of their vehicles and the value of the non-use of the vehicles
13 pending successful repair, in addition to any costs associated with purchasing safer
14 vehicles, incidental and consequential damages, and all other damages allowable
15 under the law, including such further relief as the Court deems just and proper.

16 **COUNT VI**

17 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY** 18 **(STRICT LIABILITY)**

19 **(Minn. Stat. § 336.2-314 Implied Warranty;**
20 **Merchantability; Usage Of Trade)**

21 1676. Plaintiffs reallege and incorporate by reference all paragraphs as though
22 fully set forth herein.

23 1677. Defendants impliedly warranted that their vehicles were of good and
24 merchantable quality and fit, and safe for their ordinary intended use – transporting
25
26
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1 the driver and passengers in reasonable safety during normal operation, and without
2 unduly endangering them or members of the public.

3 1678. As described above, there were dangerous defects in the vehicles
4 manufactured, distributed, and/or sold by Defendants, which Plaintiffs purchased,
5 including, but not limited to, defects that caused the vehicles to suddenly and
6 unintentionally accelerate, and the lack of safety systems which would prevent such
7 acceleration or allow a driver to safely slow and stop the vehicle when such
8 acceleration occurred.
9

10 1679. These dangerous defects existed at the time the vehicles left
11 Defendants' manufacturing facilities and at the time they were sold to the Plaintiffs.
12 Furthermore, because of these dangerous defects, Plaintiff did not receive the benefit
13 of their bargain and the vehicles have suffered a diminution in value.
14

15 1680. These dangerous defects were the direct and proximate cause of
16 damages to the Plaintiffs.

17 **COUNT VII**
18 **UNJUST ENRICHMENT**
19 **(Based On Minnesota Law)**

20 1681. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.
22

23 1682. Plaintiffs paid Toyota the value of vehicles that are non-defective, and
24 in exchange, Toyota provided Plaintiffs vehicles that are, in fact, defective.

25 1683. Further, Plaintiffs paid Toyota the value for vehicles that would not be
26 compromised by substantial, invasive repairs, and in return received vehicles that
27 require such repairs.
28

1 1684. Further, Plaintiffs paid Toyota for vehicles they could operate, and in
2 exchange, Toyota provided Plaintiffs vehicles that could not be normally operated
3 because their defects posed the possibility of life-threatening injuries or death.

4 1685. As such, Plaintiffs conferred a windfall upon Toyota., which knows of
5 the windfall and has retained such benefits, which would be unjust for Toyota to
6 retain.
7

8 1686. As a direct and proximate result of Toyota's unjust enrichment,
9 Plaintiffs have suffered and continue to suffer various damages, including, but not
10 limited to, restitution of all amounts by which Defendants were enriched through
11 their misconduct.
12

13 **COUNT VIII**
14 **STRICT LIABILITY (DESIGN DEFECT)**
15 **(Based On Minnesota Law)**

16 1687. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 1688. Defendants are and have been at all times pertinent to this Complaint,
19 engaged in the business of designing, manufacturing, assembling, promoting,
20 advertising, distributing and selling Defective Vehicles in the United States,
21 including those owned or leased by the Plaintiffs and the Class.
22

23 1689. Defendants knew and anticipated that the vehicles owned or leased by
24 Plaintiffs and the Class would be sold to and operated by purchasers and/or eventual
25 owners or lessors of Defendants' vehicles, including Plaintiffs and the Class.
26 Defendants also knew that these Defective Vehicles would reach the Plaintiffs and
27
28

1 the Class without substantial change in their condition from the time the vehicles
2 departed the Defendants' assembly lines.

3 1690. Defendants designed the Defective Vehicles defectively, causing them
4 to fail to perform as safely as an ordinary consumer would expect when used in an
5 intended and reasonably foreseeable manner.
6

7 1691. Defendants had the capability to use a feasible, alternative, safer design,
8 and failed to correct the design defects.

9 1692. The risks inherent in the design of the Defective Vehicles outweigh
10 significantly any benefits of such design.

11 1693. Plaintiffs and the Class could not have anticipated and did not know of
12 the aforementioned defects at any time prior to recent revelations regarding the
13 problems with the Defective Vehicles.
14

15 1694. As a direct and proximate result of Defendants' wrongful conduct,
16 Plaintiffs and the Class have sustained and will continue to sustain economic losses
17 and other damages for which they are entitled to compensatory and equitable
18 damages and declaratory relief in an amount to be proven at trial.
19

20 **COUNT IX**

21 **STRICT LIABILITY (FAILURE TO WARN)**

22 **(Based On Minnesota Law)**

23 1695. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1696. Defendants are and have been at all times pertinent to this Complaint,
26 engaged in the business of designing, manufacturing, assembling, promoting,
27
28

1 advertising, distributing and selling Defective Vehicles in the United States,
2 including those owned or leased by the Plaintiffs and the Class.

3 1697. Defendants, at all times pertinent to this Complaint, knew and
4 anticipated that the Defective Vehicles and their component parts would be
5 purchased, leased and operated by consumers, including Plaintiffs and the Class.
6

7 1698. Defendants also knew that these Defective Vehicles would reach the
8 Plaintiff and the Class without substantial change in their conditions from the time
9 that the vehicles departed the Defendants' assembly lines.

10 1699. Defendants knew or should have known of the substantial dangers
11 involved in the reasonably foreseeable use of the Defective Vehicles, defective
12 design, manufacturing and lack of sufficient warnings caused them to have an
13 unreasonably dangerous propensity to sudden and unintended acceleration.
14

15 1700. The Defendants failed to adequately warn Plaintiffs and the Class when
16 they became aware of the defect that caused Plaintiffs and the Class vehicles to be
17 prone to sudden and unintended acceleration.

18 1701. Defendants also failed to timely recall the vehicles or take any action to
19 timely warn Plaintiffs or the Class of these problems and instead continue to subject
20 Plaintiffs and the Class to harm.
21

22 1702. Defendants knew, or should have known, that these defects were not
23 readily recognizable to an ordinary consumer and that consumers would lease,
24 purchase and use these products without inspection.

25 1703. Defendants should have reasonably foreseen that the sudden and
26 unintended defect in the Defective Vehicles would subject the Plaintiffs and the
27 Class to harm resulting from the defect.
28

1 1704. Plaintiffs and the Class have used the Defective Vehicles for their
2 intended purpose and in a reasonable and foreseeable manner.

3 1705. As a direct and proximate result of Defendants' wrongful conduct,
4 Plaintiffs and the Class have sustained and will continue to sustain economic losses
5 and other damages for which they are entitled to compensatory and equitable
6 damages and declaratory relief in an amount to be proven at trial.
7

8 **MISSISSIPPI**

9 **COUNT I**

10 **MISSISSIPPI PRODUCTS LIABILITY ACT**

11 **(Miss. Code Ann. § 11-1-63, *et seq.*)**

12 1706. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 1707. Toyota has defectively designed, manufactured, sold or otherwise
15 placed in the stream of commerce Defective Vehicles.
16

17 1708. Toyota is strictly liable in tort for the Plaintiffs' injuries and damages
18 and the Plaintiffs respectfully rely upon the Doctrine as set forth in RESTATEMENT,
19 SECOND, TORTS § 402(a).

20 1709. Because of the negligence of the design and manufacture of the
21 Defective Vehicle, by which Plaintiffs were injured and the failure of Toyota to warn
22 Plaintiffs of the certain dangers concerning the operation of the Defective Vehicles
23 which were known to Defendants but were unknown to Plaintiffs, the Defendants
24 have committed a tort.
25

26 1710. The Defective Vehicles which caused Plaintiffs' injuries were
27 manufactured by Toyota.
28

1 1711. At all times herein material, Defendants negligently and carelessly did
2 certain acts and failed to do other things, including, but not limited to, inventing,
3 developing, designing, researching, guarding, manufacturing, building, inspecting,
4 investigating, testing, labeling, instructing, and negligently and carelessly failing to
5 provide adequate and fair warning of the characteristics, dangers and hazards
6 associated with the operation of the vehicles in question to users of the Defective
7 Vehicles, including, but not limited to, Plaintiffs, and willfully failing to recall or
8 otherwise cure one or more of the defects in the product involved thereby directly
9 and proximately causing the hereinafter described injury.
10

11 1712. The Defective Vehicles were unsafe for their use by reason of the fact
12 that they were defective. For example, the Defective Vehicles were defective in their
13 design, guarding, development, manufacture, and lack of permanent, accurate,
14 adequate and fair warning of the characteristics, danger and hazard to the user,
15 prospective user and members of the general public, including, but not limited to,
16 Plaintiffs, and because Defendants failed to recall or otherwise cure one or more
17 defects in the vehicles involved thereby directly and proximately causing the
18 described injuries.
19
20

21 1713. Defendants, and each of them, knew or reasonably should have known
22 that the above mentioned product would be purchased and used without all necessary
23 testing or inspection for defects by the Plaintiffs and the Class.

24 1714. Plaintiffs were not aware of those defects at any time before the incident
25 and occurrence mentioned in this complaint, or else Plaintiff was unable, as a
26 practical matter, to cure that defective condition.
27

28 1715. Plaintiffs used the product in a foreseeable manner.

1 1716. As a proximate result of the negligence of Defendants, Plaintiffs
2 suffered injuries and damages.

3 **COUNT II**
4 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
5 **(Miss. Code Ann. §§ 75-2-314)**

6 1717. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 1718. Toyota has defectively designed, manufactured, sold or otherwise
9 placed in the stream of commerce defective vehicles as set forth above.

10 1719. Toyota impliedly warranted that the Defective Vehicles were
11 merchantable and for the ordinary purpose for which they were designed,
12 manufactured, and sold.

13 1720. The Defective Vehicles were not in merchantable condition or fit for
14 ordinary use due to the defects described above and as a result of the breach of
15 warranty of merchantability by Toyota, Plaintiffs sustained injuries and damages.

16 **COUNT III**
17 **NEGLIGENCE**
18 **(Under Mississippi Law)**

19 1721. Plaintiffs reallege and incorporate by reference all paragraphs as though
20 fully set forth herein.

21 1722. Toyota has defectively designed, manufactured, sold or otherwise
22 placed in the stream of commerce defective vehicles as set forth above.

23 1723. Toyota had a duty to manufacture a product which would be safe for its
24 intended and foreseeable uses and users, including the use to which it was put by
25

1 Plaintiff. Toyota breached its duty to Plaintiffs and the Class because it was
2 negligent in the design, development, manufacture, and testing of the Defective
3 Vehicles.

4 1724. Toyota was negligent in its design, development, manufacture, and
5 testing of the Defective Vehicles because it knew, or in the exercise of reasonable
6 care should have known, that they were prone to sudden unintended and dangerous
7 acceleration and lacked proper fail-safe mechanisms.

8 1725. Toyota negligently failed to adequately warn and instruct Plaintiffs and
9 the Class of the defective nature of the Defective Vehicles, of the high degree of risk
10 attendant to the using them, given that the users of the Defective Vehicles would be
11 ignorant of the said defective.

12 1726. Whereupon, the Plaintiffs respectfully rely upon the RESTATEMENT,
13 SECOND, TORTS § 395.

14 1727. Toyota further breached its duties to Plaintiffs by supplying directly
15 and/or through a third person to be used by such foreseeable persons such as
16 Plaintiffs when:

17 a. Toyota knew or had reason to know, that the Subject Vehicle was
18 dangerous or was likely to be dangerous for the use for which it was supplied; and

19 b. Toyota failed to exercise reasonable care to inform customers of
20 the dangerous condition, or of the facts under which the Subject Vehicle is likely to
21 be dangerous.

22 1728. As a result of Toyota's negligence, Plaintiffs and the Class suffered
23 damages.

COUNT IV
REVOCATION OF ACCEPTANCE
(Miss. Code Ann. § 75-2-608)

1729. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1730. Plaintiffs identified above demanded revocation and the demands were refused.

1731. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

1732. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

1733. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

1734. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

1735. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 1736. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 1737. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 1738. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
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23 1739. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in MISS. CODE ANN. § 75-2-602, for a revocation of acceptance of the goods, and for
26 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
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1 owned and for such other incidental and consequential damages as allowed under
2 MISS. CODE ANN. § 75-2-602

3 1740. Consequently, Plaintiffs and the Class are entitled to revoke their
4 acceptances, receive all payments made to Toyota, and to all incidental and
5 consequential damages, including the costs associated with purchasing safer vehicles,
6 and all other damages allowable under law, all in amounts to be proven at trial.

8 **COUNT V**

9 **NEGLIGENT MISREPRESENTATION/FRAUD**

10 **(Based On Mississippi Law)**

11 1741. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1742. As set forth above, Defendants concealed and/or suppressed material
14 facts concerning the safety of their vehicles.

15 1743. Defendants had a duty to disclose these safety issues because they
16 consistently marketed their vehicles as safe and proclaimed that safety is one of
17 Toyota's highest corporate priorities. Once Defendants made representations to the
18 public about safety, Defendants were under a duty to disclose these omitted facts,
19 because where one does speak one must speak the whole truth and not conceal any
20 facts which materially qualify those facts stated. One who volunteers information
21 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

22 1744. In addition, Defendants had a duty to disclose these omitted material
23 facts because they were known and/or accessible only to Defendants who have
24 superior knowledge and access to the facts, and Defendants knew they were not
25 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
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1 were material because they directly impact the safety of the Defective Vehicles.
2 Whether or not a vehicle accelerates only at the driver's command, and whether a
3 vehicle will stop or not upon application of the brake by the driver, are material
4 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
5 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
6

7 1745. Defendants actively concealed and/or suppressed these material facts, in
8 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
9 Defective Vehicles at a higher price for the vehicles, which did not match the
10 vehicles' true value.

11 1746. Defendants still have not made full and adequate disclosure and
12 continue to defraud Plaintiffs and the Class.
13

14 1747. Plaintiffs and the Class were unaware of these omitted material facts
15 and would not have acted as they did if they had known of the concealed and/or
16 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
17 in exclusive control of the material facts and such facts were not known to the public
18 or the Class.
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20 1748. As a result of the misrepresentation concealment and/or suppression of
21 the facts, Plaintiffs and the Class sustained damage. For those Plaintiffs and the
22 Class who elect to affirm the sale, these damages, under Mississippi law, include the
23 difference between the actual value of that which Plaintiffs and the Class paid and
24 the actual value of that which they received, together with additional damages arising
25 from the sales transaction, amounts expended in reliance upon the fraud,
26 compensation for loss of use and enjoyment of the property, and/or lost profits. For
27 those Plaintiffs and the Class who want to rescind the purchase, then those Plaintiffs
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1 and the Class are entitled to restitution and consequential damages under Mississippi
2 law.

3 1749. Defendants' acts were done maliciously, oppressively, deliberately, with
4 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
5 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
6 punitive damages in an amount sufficient to deter such conduct in the future, which
7 amount is to be determined according to proof.

9 **COUNT VI**
10 **UNJUST ENRICHMENT**
11 **(Based On Mississippi Law)**

12 1750. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 1751. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Defendants charged a higher price for their vehicles than the vehicles'
17 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

18 1752. Defendants enjoyed the benefit of increased financial gains, to the
19 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
20 actually had lower values. It would be inequitable and unjust for Defendants to
21 retain these wrongfully obtained profits.

22 1753. Plaintiffs, therefore, seek an order establishing Defendants as
23 constructive trustees of the profits unjustly obtained, plus interest.
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MISSOURI
COUNT I
VIOLATION OF MISSOURI MERCHANDISING PRACTICES ACT
(Mo. Rev. Stat. § 407.010, *et seq.*)

1754. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1755. The conduct of Toyota as set forth herein constitutes unfair or deceptive acts or practices, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and remedy, and its misrepresentations and omissions regarding the safety and reliability of its vehicles.

1756. Toyota's actions as set forth above occurred in the conduct of trade or commerce.

1757. Toyota's actions impact the public interest because Plaintiffs were injured in exactly the same way as millions of others purchasing and/or leasing Toyota vehicles as a result of Toyota's generalized course of deception. All of the wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Toyota's business.

1758. Plaintiffs and the Class were injured as a result of Defendant's conduct. Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of their bargain, and their vehicles have suffered a diminution in value.

1759. Toyota's conduct proximately caused the injuries to Plaintiffs and the Class.

1 1760. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
2 proven at trial, including attorneys' fees, costs, and treble damages.

3 1761. Pursuant to MO. REV. STAT. § 407.010, Plaintiffs will serve the Missouri
4 Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.
5

6 **COUNT II**
7 **BREACH OF EXPRESS WARRANTY**
8 **(Mo. Rev. Stat. § 400.2-313)**

9 1762. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 1763. Toyota is and was at all relevant times a merchant with respect to motor
12 vehicles.

13 1764. In the course of selling its vehicles, Toyota expressly warranted in
14 writing that the Vehicles were covered by a Basic Warranty.
15

16 1765. Toyota breached the express warranty to repair and adjust to correct
17 defects in materials and workmanship of any part supplied by Toyota. Toyota has
18 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
19 materials and workmanship defects.

20 1766. In addition to this Basic Warranty, Toyota expressly warranted several
21 attributes, characteristics and qualities, as set forth above.
22

23 1767. These warranties are only a sampling of the numerous warranties that
24 Toyota made relating to safety, reliability and operation, which are more fully
25 outlined in Section IV.A., *supra*. Generally these express warranties promise
26 heightened, superior, and state-of-the-art safety, reliability, performance standards,
27 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
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1 advertisements, in Toyota's "e brochures," and in uniform statements provided by
2 Toyota to be made by salespeople. These affirmations and promises were part of the
3 basis of the bargain between the parties.

4 1768. These additional warranties were also breached because the Defective
5 Vehicles were not fully operational, safe, or reliable (and remained so even after the
6 problems were acknowledged and a recall "fix" was announced), nor did they
7 comply with the warranties expressly made to purchasers or lessees. Toyota did not
8 provide at the time of sale, and has not provided since then, vehicles conforming to
9 these express warranties.
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11 1769. Furthermore, the limited warranty of repair and/or adjustments to
12 defective parts, fails in its essential purpose because the contractual remedy is
13 insufficient to make the Plaintiffs and the Class whole and because the Defendants
14 have failed and/or have refused to adequately provide the promised remedies within
15 a reasonable time.
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17 1770. Accordingly, recovery by the Plaintiffs is not limited to the limited
18 warranty of repair or adjustments to parts defective in materials or workmanship, and
19 Plaintiffs seek all remedies as allowed by law.
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21 1771. Also, as alleged in more detail herein, at the time that Defendants
22 warranted and sold the vehicles they knew that the vehicles did not conform to the
23 warranties and were inherently defective, and Defendants wrongfully and
24 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
25 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
26 and/or fraudulent pretenses.
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1 1772. Moreover, many of the damages flowing from the Defective Vehicles
2 cannot be resolved through the limited remedy of “replacement or adjustments,” as
3 those incidental and consequential damages have already been suffered due to
4 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
5 continued failure to provide such limited remedy within a reasonable time, and any
6 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
7 Plaintiffs and the Class whole.
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9 1773. Finally, due to the Defendants’ breach of warranties as set forth herein,
10 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
11 in MO. REV. STAT. § 400.2-608, for a revocation of acceptance of the goods, and for
12 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
13 owned.
14

15 1774. Toyota was provided notice of these issues by numerous complaints
16 filed against it, including the instant complaint, and by numerous individual letters
17 and communications sent by Plaintiffs and the Class before or within a reasonable
18 amount of time after Toyota issued the recall and the allegations of vehicle defects
19 became public.
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21 1775. As a direct and proximate result of Toyota’s breach of express
22 warranties, Plaintiffs and the Class have been damaged in an amount to be
23 determined at trial.
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COUNT III

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Mo. Rev. Stat. § 400.2-314)

1776. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1777. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

1778. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions, pursuant to MO. REV. STAT. § 400.2-314.

1779. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1780. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1781. Plaintiffs and the Class have had sufficient dealings with either the Defendants or their agents (dealerships) to establish privity of contract between

1 Plaintiffs and the Class. Notwithstanding this, privity is not required in this case
2 because Plaintiffs and the Class are intended third-party beneficiaries of contracts
3 between Toyota and its dealers; specifically, they are the intended beneficiaries of
4 Toyota's implied warranties. The dealers were not intended to be the ultimate
5 consumers of the Defective Vehicles and have no rights under the warranty
6 agreements provided with the Defective Vehicles; the warranty agreements were
7 designed for and intended to benefit the ultimate consumers only. Finally, privity is
8 also not required because Plaintiffs' and the Class' Toyotas are dangerous
9 instrumentalities due to the aforementioned defects and nonconformities.
10

11 1782. As a direct and proximate result of Toyota's breach of the warranties of
12 merchantability, Plaintiffs and the Class have been damaged in an amount to be
13 proven at trial.
14

15 **COUNT IV**
16 **REVOCATION OF ACCEPTANCE**
17 **(Mo. Rev. Stat. § 400.2-608)**

18 1783. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 1784. Plaintiffs identified above demanded revocation and the demands were
21 refused.
22

23 1785. Plaintiffs and the Class had no knowledge of such defects and
24 nonconformities, were unaware of these defects, and reasonably could not have
25 discovered them when they purchased or leased their automobiles from Toyota. On
26 the other hand, Toyota was aware of the defects and nonconformities at the time of
27 sale and thereafter.
28

1 1786. Acceptance was reasonably induced by the difficulty of discovery of the
2 defects and nonconformities before acceptance.

3 1787. There has been no change in the condition of Plaintiffs' vehicles not
4 caused by the defects and nonconformities.

5 1788. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
6 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
7 paid.
8

9 1789. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them.
14

15 1790. These defects and nonconformities substantially impaired the value of
16 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
17 basic sources. First, the Defective Vehicles fail in their essential purpose because
18 they present an unreasonably high risk of sudden unintended acceleration (a risk
19 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
20 Second, the repair and adjust warranty has failed of its essential purpose because
21 Toyota cannot repair or adjust the Defective Vehicles.
22

23 1791. Plaintiffs and the Class provided notice of their intent to seek revocation
24 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
25 (and many Class members) have requested that Toyota accept return of their vehicles
26 and return all payments made. Plaintiffs on behalf of themselves and the Class
27 hereby demand revocation and tender their Defective Vehicles.
28

1 1792. Plaintiffs and the Class would suffer economic hardship if they returned
2 their vehicles but did not receive the return of all payments made by them. Because
3 Toyota is refusing to acknowledge any revocation of acceptance and return
4 immediately any payments made, Plaintiffs and the Class have not re-accepted their
5 Defective Vehicles by retaining them, as they must continue using them due to the
6 financial burden of securing alternative means of transport for an uncertain and
7 substantial period of time.

9 1793. Finally, due to the Defendants' breach of warranties as set forth herein,
10 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
11 in MO. REV. STAT. § 400.2-608, for a revocation of acceptance of the goods, and for
12 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
13 owned.

15 1794. Consequently, Plaintiffs and the Class are entitled to revoke their
16 acceptances, receive all payments made to Toyota, and to all incidental and
17 consequential damages, including the costs associated with purchasing safer vehicles,
18 and all other damages allowable under law, all in amounts to be proven at trial.

20 **COUNT V**

21 **BREACH OF CONTRACT/COMMON LAW WARRANTY**

22 **(Based On Missouri Law)**

23 1795. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1796. To the extent Toyota's repair or adjust commitment is deemed not to be
26 a warranty under Missouri's Commercial Code, Plaintiffs plead in the alternative
27 under common law warranty and contract law. Toyota limited the remedies
28

1 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
2 defects in materials or workmanship of any part supplied by Toyota, and/or
3 warranted the quality or nature of those services to Plaintiffs.

4 1797. Toyota breached this warranty or contract obligation by failing to repair
5 the Defective Vehicles evidencing a sudden unintended acceleration problem,
6 including those that were recalled, or to replace them.

7 1798. As a direct and proximate result of Defendants' breach of contract or
8 common law warranty, Plaintiffs and the Class have been damaged in an amount to
9 be proven at trial, which shall include, but is not limited to, all compensatory
10 damages, incidental and consequential damages, and other damages allowed by law.

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13 **COUNT VI**
14 **FRAUD BY CONCEALMENT**
15 **(Based On Missouri Law)**

16 1799. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 1800. As set forth above, Defendants concealed and/or suppressed material
19 facts concerning the safety of their vehicles.

20 1801. Defendants had a duty to disclose these safety issues because they
21 consistently marketed their vehicles as safe and proclaimed that safety is one of
22 Toyota's highest corporate priorities. Once Defendants made representations to the
23 public about safety, Defendants were under a duty to disclose these omitted facts,
24 because where one does speak one must speak the whole truth and not conceal any
25 facts which materially qualify those facts stated. One who volunteers information
26 must be truthful, and the telling of a half-truth calculated to deceive is fraud.
27
28

1 1802. In addition, Defendants had a duty to disclose these omitted material
2 facts because they were known and/or accessible only to Defendants who have
3 superior knowledge and access to the facts, and Defendants knew they were not
4 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
5 were material because they directly impact the safety of the Defective Vehicles.
6 Whether or not a vehicle accelerates only at the driver's command, and whether a
7 vehicle will stop or not upon application of the brake by the driver, are material
8 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
9 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
10

11 1803. Defendants actively concealed and/or suppressed these material facts, in
12 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
13 Defective Vehicles at a higher price for the vehicles, which did not match the
14 vehicles' true value.
15

16 1804. Defendants still have not made full and adequate disclosure and
17 continue to defraud Plaintiffs and the Class.
18

19 1805. Plaintiffs and the Class were unaware of these omitted material facts
20 and would not have acted as they did if they had known of the concealed and/or
21 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
22 in exclusive control of the material facts and such facts were not known to the public
23 or the Class.
24

25 1806. As a result of the concealment and/or suppression of the facts, Plaintiffs
26 and the Class sustained damage. For those Plaintiffs and the Class who elect to
27 affirm the sale, these damages, include the difference between the actual value of
28 that which Plaintiffs and the Class paid and the actual value of that which they

1 received, together with additional damages arising from the sales transaction,
2 amounts expended in reliance upon the fraud, compensation for loss of use and
3 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
4 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
5 restitution and consequential damages.
6

7 1807. Defendants' acts were done maliciously, oppressively, deliberately, with
8 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
9 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
10 punitive damages in an amount sufficient to deter such conduct in the future, which
11 amount is to be determined according to proof.
12

13 **COUNT VII**
14 **UNJUST ENRICHMENT**
15 **(Based On Missouri Law)**

16 1808. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 1809. Toyota had knowledge of the safety defects in its vehicles, which it
19 failed to disclose to Plaintiffs and the Class.

20 1810. As a result of their wrongful and fraudulent acts and omissions, as set
21 forth above, pertaining to the design defect of their vehicles and the concealment of
22 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
23 value and Toyota obtained monies which rightfully belong to Plaintiffs.
24

25 1811. Toyota appreciated, accepted and retained the non-gratuitous benefits
26 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
27
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1 paid a higher price for vehicles which actually had lower values. It would be
2 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

3 1812. Plaintiffs, therefore, are entitled to restitution and seek an order
4 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
5 interest.
6

7 **MONTANA**

8 **COUNT I**

9 **BREACH OF EXPRESS WARRANTY**

10 **(Mont. Code § 30-2-313)**

11 1813. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1814. Toyota is and was at all relevant times a merchant with respect to motor
14 vehicles under MONT. CODE. ANN. § 30-2-104.
15

16 1815. In the course of selling its vehicles, Toyota expressly warranted in
17 writing that the Vehicles were covered by a Basic Warranty.

18 1816. Toyota breached the express warranty to repair and adjust to correct
19 defects in materials and workmanship of any part supplied by Toyota. Toyota has
20 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
21 materials and workmanship defects.
22

23 1817. In addition to this Basic Warranty, Toyota expressly warranted several
24 attributes, characteristics and qualities, as set forth above.

25 1818. These warranties are only a sampling of the numerous warranties that
26 Toyota made relating to safety, reliability and operation, which are more fully
27 outlined in Section IV.A., *supra*. Generally these express warranties promise
28

1 heightened, superior, and state-of-the-art safety, reliability, performance standards,
2 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
3 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
4 Toyota to be made by salespeople. These affirmations and promises were part of the
5 basis of the bargain between the parties.
6

7 1819. These additional warranties were also breached because the Defective
8 Vehicles were not fully operational, safe, or reliable (and remained so even after the
9 problems were acknowledged and a recall "fix" was announced), nor did they
10 comply with the warranties expressly made to purchasers or lessees. Toyota did not
11 provide at the time of sale, and has not provided since then, vehicles conforming to
12 these express warranties.
13

14 1820. Furthermore, the limited warranty of repair and/or adjustments to
15 defective parts, fails in its essential purpose because the contractual remedy is
16 insufficient to make the Plaintiffs and the Class whole and because the Defendants
17 have failed and/or have refused to adequately provide the promised remedies within
18 a reasonable time.
19

20 1821. Accordingly, recovery by the Plaintiffs is not limited to the limited
21 warranty of repair or adjustments to parts defective in materials or workmanship, and
22 Plaintiffs seek all remedies as allowed by law.

23 1822. Also, as alleged in more detail herein, at the time that Defendants
24 warranted and sold the vehicles they knew that the vehicles did not conform to the
25 warranties and were inherently defective, and Defendants wrongfully and
26 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
27 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
28

1 and/or fraudulent pretenses. The enforcement under these circumstances of any
2 limitations whatsoever precluding the recovery of incidental and/or consequential
3 damages is unenforceable pursuant to MONT. CODE ANN. § 30-2-302.

4 1823. Moreover, many of the damages flowing from the Defective Vehicles
5 cannot be resolved through the limited remedy of “replacement or adjustments,” as
6 those incidental and consequential damages have already been suffered due to
7 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
8 continued failure to provide such limited remedy within a reasonable time, and any
9 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
10 Plaintiffs and the Class whole.
11

12 1824. Finally, due to the Defendants’ breach of warranties as set forth herein,
13 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
14 in MONT. CODE § 30-2-711, for a revocation of acceptance of the goods, and for a
15 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
16 owned and for such other incidental and consequential damages as allowed under
17 MONT. CODE §§ 30-2-711 and 30-2-608.
18

19 1825. Toyota was provided notice of these issues by numerous complaints
20 filed against it, including the instant complaint, and by numerous individual letters
21 and communications sent by Plaintiffs and the Class before or within a reasonable
22 amount of time after Toyota issued the recall and the allegations of vehicle defects
23 became public.
24

25 1826. As a direct and proximate result of Toyota’s breach of express
26 warranties, Plaintiffs and the Class have been damaged in an amount to be
27 determined at trial.
28

COUNT II

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Mont. Code § 30-2-314)

1827. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1828. Toyota is and was at all relevant times a merchant with respect to motor vehicles under MONT. CODE § 30-2-104.

1829. A warranty that the Defective Vehicles were in merchantable condition was implied by law in the instant transaction, pursuant to MONT. CODE § 30-2-314.

1830. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1831. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1832. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT III
REVOCATION OF ACCEPTANCE
(Mont. Code § 30-2-608)

1833. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1834. Plaintiffs identified above demanded revocation and the demands were refused.

1835. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

1836. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

1837. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

1838. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

1839. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 1840. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 1841. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 1842. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 1843. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in MONT. CODE § 30-2-711, for a revocation of acceptance of the goods, and for a
26 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
27
28

1 owned and for such other incidental and consequential damages as allowed under
2 MONT. CODE § 30-2-711.

3 1844. Consequently, Plaintiffs and the Class are entitled to revoke their
4 acceptances, receive all payments made to Toyota, and to all incidental and
5 consequential damages, including the costs associated with purchasing safer vehicles,
6 and all other damages allowable under law, all in amounts to be proven at trial.

7
8 **COUNT IV**
9 **BREACH OF CONTRACT/Common Law Warranty**
10 **(Based On Montana Law)**

11 1845. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 1846. To the extent Toyota's repair or adjust commitment is deemed not to be
14 a warranty under Montana's Commercial Code, Plaintiffs plead in the alternative
15 under common law warranty and contract law. Toyota limited the remedies
16 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
17 defects in materials or workmanship of any part supplied by Toyota, and/or
18 warranted the quality or nature of those services to Plaintiffs.

19 1847. Toyota breached this warranty or contract obligation by failing to repair
20 the Defective Vehicles evidencing a sudden unintended acceleration problem,
21 including those that were recalled, or to replace them.

22 1848. As a direct and proximate result of Defendants' breach of contract or
23 common law warranty, Plaintiffs and the Class have been damaged in an amount to
24 be proven at trial, which shall include, but is not limited to, all compensatory
25 damages, incidental and consequential damages, and other damages allowed by law.
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COUNT V
FRAUD BY CONCEALMENT
(Based On Montana Law)

1849. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1850. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety of their vehicles.

1851. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

1852. In addition, Defendants had a duty to disclose these omitted material facts because they were known and/or accessible only to Defendants who have superior knowledge and access to the facts, and Defendants knew they were not known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts were material because they directly impact the safety of the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's command, and whether a vehicle will stop or not upon application of the brake by the driver, are material safety concerns. Defendants possessed exclusive knowledge of the defects rendering Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

1 1853. Defendants actively concealed and/or suppressed these material facts, in
2 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
3 Defective Vehicles at a higher price for the vehicles, which did not match the
4 vehicles' true value.

5
6 1854. Defendants still have not made full and adequate disclosure and
7 continue to defraud Plaintiffs and the Class.

8 1855. Plaintiffs and the Class were unaware of these omitted material facts
9 and would not have acted as they did if they had known of the concealed and/or
10 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
11 in exclusive control of the material facts and such facts were not known to the public
12 or the Class.

13
14 1856. As a result of the concealment and/or suppression of the facts, Plaintiffs
15 and the Class sustained damage.

16 1857. Defendants' acts were done maliciously, oppressively, deliberately, with
17 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
18 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
19 punitive damages in an amount sufficient to deter such conduct in the future, which
20 amount is to be determined according to proof.

21
22 **COUNT VI**
23 **UNJUST ENRICHMENT**
24 **(Based On Montana Law)**

25 1858. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.

1 1859. As a result of their wrongful and fraudulent acts and omissions, as set
2 forth above, pertaining to the design defect of their vehicles and the concealment of
3 the defect, Defendants charged a higher price for their vehicles than the vehicles'
4 true value and Defendants obtained monies which rightfully belong to Plaintiffs.
5

6 1860. Defendants enjoyed the benefit of increased financial gains, to the
7 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
8 actually had lower values. It would be inequitable and unjust for Defendants to
9 retain these wrongfully obtained profits.

10 1861. Plaintiffs, therefore, seek an order establishing Defendants as
11 constructive trustees of the profits unjustly obtained, plus interest.
12

13 **NEBRASKA**

14 **COUNT I**

15 **VIOLATION OF THE NEBRASKA CONSUMER PROTECTION ACT**

16 **(Neb. Rev. Stat. § 59-1601, *et seq.*)**

17 1862. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 1863. The Nebraska Consumer Protection Act ("NCPA") prohibits "unfair or
20 deceptive acts or practices in the conduct of any trade or commerce."
21

22 1864. "Trade or commerce" means "the sale of assets or services and any
23 commerce directly or indirectly affecting the people of the State of Nebraska."

24 1865. The conduct of Toyota as set forth herein constitutes unfair or deceptive
25 acts or practices, including, but not limited to, Toyota's manufacture and sale of
26 vehicles with a sudden acceleration defect that lack brake-override or other effective
27 fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and
28

1 remedy, and its misrepresentations and omissions regarding the safety and reliability
2 of its vehicles, which misrepresentations and omissions possessed the tendency or
3 capacity to mislead.

4 1866. Toyota's actions as set forth above occurred in the conduct of trade or
5 commerce.

6
7 1867. Toyota's actions impact the public interest because Plaintiffs were
8 injured in exactly the same way as millions of others purchasing and/or leasing
9 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
10 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
11 Toyota's business.

12 1868. Plaintiffs and the Class were injured as a result of Defendants' conduct.
13 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
14 their bargain, and their vehicles have suffered a diminution in value.

15 1869. Toyota's conduct proximately caused the injuries to Plaintiffs and the
16 Class, who are entitled to recover actual damages, as well as enhanced damages
17 pursuant to § 59-1609.

18 19 20 **COUNT II**

21 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

22 **(Neb. Rev. Stat. Neb. § 2-314)**

23 1870. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 1871. Toyota is and was at all relevant times a merchant with respect to motor
26 vehicles.

1 1872. A warranty that the Defective Vehicles were in merchantable condition
2 is implied by law in the instant transactions.

3 1873. These vehicles, when sold and at all times thereafter, were not in
4 merchantable condition and are not fit for the ordinary purpose for which cars are
5 used. Specifically, the Defective Vehicles are inherently defective in that there are
6 defects in the vehicle control systems that permit sudden unintended acceleration to
7 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
8 such SUA events, nor do they have a brake-override; and the ETCS system was not
9 adequately tested.
10

11 1874. Toyota was provided notice of these issues by numerous complaints
12 filed against it, including the instant complaint, and by numerous individual letters
13 and communications sent by Plaintiffs and the Class before or within a reasonable
14 amount of time after Toyota issued the recall and the allegations of vehicle defects
15 became public.
16

17 1875. As a direct and proximate result of Toyota's breach of the warranties of
18 merchantability, Plaintiffs and the Class have been damaged in an amount to be
19 proven at trial.
20

21 **COUNT III**
22 **REVOCATION OF ACCEPTANCE**
23 **(Nev. Rev. Stat. NEB. § 2-608)**

24 1876. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 1877. Plaintiffs identified above demanded revocation and the demands were
27 refused.
28

1 1878. Plaintiffs and the Class had no knowledge of such defects and
2 nonconformities, were unaware of these defects, and reasonably could not have
3 discovered them when they purchased or leased their automobiles from Toyota. On
4 the other hand, Toyota was aware of the defects and nonconformities at the time of
5 sale and thereafter.

7 1879. Acceptance was reasonably induced by the difficulty of discovery of the
8 defects and nonconformities before acceptance.

9 1880. There has been no change in the condition of Plaintiffs' vehicles not
10 caused by the defects and nonconformities.

11 1881. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
12 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
13 paid.

15 1882. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them.

21 1883. These defects and nonconformities substantially impaired the value of
22 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
23 basic sources. First, the Defective Vehicles fail in their essential purpose because
24 they present an unreasonably high risk of sudden unintended acceleration (a risk
25 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
26 Second, the repair and adjust warranty has failed of its essential purpose because
27 Toyota cannot repair or adjust the Defective Vehicles.
28

1 1884. Plaintiffs and the Class provided notice of their intent to seek revocation
2 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
3 (and many Class members) have requested that Toyota accept return of their vehicles
4 and return all payments made. Plaintiffs on behalf of themselves and the Class
5 hereby demand revocation and tender their Defective Vehicles.
6

7 1885. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them, as they must continue using them due to the
12 financial burden of securing alternative means of transport for an uncertain and
13 substantial period of time.
14

15 1886. Finally, due to the Defendants' breach of warranties as set forth herein,
16 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
17 in R.R.S. Neb. § 2-608, for a revocation of acceptance of the goods, and for a return
18 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.
19

20 1887. Consequently, Plaintiffs and the Class are entitled to revoke their
21 acceptances, receive all payments made to Toyota, and to all incidental and
22 consequential damages, including the costs associated with purchasing safer vehicles,
23 and all other damages allowable under law, all in amounts to be proven at trial.
24
25
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28

COUNT IV

IN THE ALTERNATIVE, UNJUST ENRICHMENT

(Based On Nebraska Law)

1888. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1889. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

1890. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

1891. Toyota received and retained benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unconscionable for Toyota to retain these wrongfully obtained profits.

1892. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

NEVADA

COUNT I

VIOLATION OF THE NEVADA DECEPTIVE TRADE PRACTICES ACT

(Nev. Rev. Stat. § 598.0903, *et seq.*)

1893. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 1894. Toyota is a “person” as required under the statute.

2 1895. Toyota’s actions as set forth above occurred in the course of business.

3 1896. The Nevada Deceptive Trade Practices Act, NEV. REV. STAT.

4 § 598.0903, *et seq.*, prohibits unfair or deceptive consumer sales practices.

5
6 1897. The NEV. REV. STAT. § 598.0915 provides that a person engages in a
7 “deceptive trade practice” if, in the course of his or her business or occupation, he or
8 she does any of the following, including: “5. Knowingly makes a false
9 representation as to the characteristics, ingredients, uses, benefits, alterations or
10 quantities of goods or services for sale or lease or a false representation as to the
11 sponsorship, approval, status, affiliation or connection of a person therewith”; “7.
12 Represents that goods or services for sale or lease are of a particular standard, quality
13 or grade, or that such goods are of a particular style or model, if he or she knows or
14 should know that they are of another standard, quality, grade, style or model”; “9.
15 Advertises goods or services with intent not to sell or lease them as advertised”; or
16 “15. Knowingly makes any other false representation in a transaction.”
17

18 1898. In the course of Toyota’s business, it willfully failed to disclose and
19 actively concealed the dangerous risk of throttle control failure and the lack of
20 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
21 described above. Accordingly, Toyota engaged in deceptive trade practices,
22 including making false representation as to the characteristics, uses, and benefits of
23 the Defective Vehicles; representing that Defective Vehicles are of a particular
24 standard and quality when they are not; advertising Defective Vehicles with the
25 intent not to sell them as advertised; and knowingly made numerous other false
26 representations as further described during the fact section of this complaint.
27
28

1 1899. Toyota knowingly made false representations to consumers with the
2 intent to induce consumers into purchasing Toyota vehicles. Plaintiffs reasonably
3 relied on false representations by Toyota and were induced to each purchase a
4 Toyota vehicle, to his/her detriment. As a result of these unlawful trade practices,
5 Plaintiffs have suffered ascertainable loss.
6

7 1900. Plaintiffs and the Class suffered ascertainable loss caused by Toyota's
8 false representations and failure to disclose material information. Plaintiffs and the
9 Class overpaid for their vehicles and did not receive the benefit of their bargain. The
10 value of their Toyota's has diminished now that the safety issues have come to light,
11 and Plaintiffs and the Class own vehicles that are not safe.
12

13 **COUNT II**
14 **BREACH OF EXPRESS WARRANTY**
15 **(Nev. Rev. Stat. § 104.2313)**

16 1901. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 1902. Toyota is and was at all relevant times a merchant with respect to motor
19 vehicles under the Uniform Commercial Code.

20 1903. In the course of selling its vehicles, Toyota expressly warranted in
21 writing that the Vehicles were covered by a Basic Warranty.
22

23 1904. Toyota breached the express warranty to repair and adjust to correct
24 defects in materials and workmanship of any part supplied by Toyota. Toyota has
25 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
26 materials and workmanship defects.
27
28

1 1905. In addition to this Basic Warranty, Toyota expressly warranted several
2 attributes, characteristics and qualities, as set forth above.

3 1906. These warranties are only a sampling of the numerous warranties that
4 Toyota made relating to safety, reliability and operation, which are more fully
5 outlined in Section IV.A., *supra*. Generally these express warranties promise
6 heightened, superior, and state-of-the-art safety, reliability, performance standards,
7 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
8 advertisements, in Toyota's "e brochures," and in uniform statements provided by
9 Toyota to be made by salespeople. These affirmations and promises were part of the
10 basis of the bargain between the parties.
11

12 1907. These additional warranties were also breached because the Defective
13 Vehicles were not fully operational, safe, or reliable (and remained so even after the
14 problems were acknowledged and a recall "fix" was announced), nor did they
15 comply with the warranties expressly made to purchasers or lessees. Toyota did not
16 provide at the time of sale, and has not provided since then, vehicles conforming to
17 these express warranties.
18

19 1908. Furthermore, the limited warranty of repair and/or adjustments to
20 defective parts, fails in its essential purpose because the contractual remedy is
21 insufficient to make the Plaintiffs and the Class whole and because the Defendants
22 have failed and/or have refused to adequately provide the promised remedies within
23 a reasonable time.
24

25 1909. Accordingly, recovery by the Plaintiffs is not limited to the limited
26 warranty of repair or adjustments to parts defective in materials or workmanship, and
27 Plaintiffs seek all remedies as allowed by law.
28

1 1910. Also, as alleged in more detail herein, at the time that Defendants
2 warranted and sold the vehicles they knew that the vehicles did not conform to the
3 warranties and were inherently defective, and Defendants wrongfully and
4 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
5 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
6 and/or fraudulent pretenses.
7

8 1911. Moreover, many of the damages flowing from the Defective Vehicles
9 cannot be resolved through the limited remedy of “replacement or adjustments,” as
10 those incidental and consequential damages have already been suffered due to
11 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
12 continued failure to provide such limited remedy within a reasonable time, and any
13 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
14 Plaintiffs and the Class whole.
15

16 1912. Toyota was provided notice of these issues by numerous complaints
17 filed against it, including the instant complaint, and by numerous individual letters
18 and communications sent by Plaintiffs and the Class before or within a reasonable
19 amount of time after Toyota issued the recall and the allegations of vehicle defects
20 became public.
21

22 1913. As a direct and proximate result of Toyota’s breach of express
23 warranties, Plaintiffs and the Class have been damaged in an amount to be
24 determined at trial.
25
26
27
28

COUNT III

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Nev. Rev. Stat. § 104.2314)

1914. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1915. Toyota is and was at all relevant times a merchant with respect to motor vehicles under the Uniform Commercial Code.

1916. A warranty that the Defective Vehicles were in merchantable condition was implied by law in the instant transaction, pursuant to the Uniform Commercial Code.

1917. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1918. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1 1919. As a direct and proximate result of Toyota's breach of the warranties of
2 merchantability, Plaintiffs and the Class have been damaged in an amount to be
3 proven at trial.

4
5 **COUNT IV**
6 **REVOCATION OF ACCEPTANCE**
7 **(Nev. Rev. Stat. § 104.2608)**

8 1920. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1921. Plaintiffs identified above demanded revocation and the demands were
11 refused.

12 1922. Plaintiffs and the Class had no knowledge of such defects and
13 nonconformities, were unaware of these defects, and reasonably could not have
14 discovered them when they purchased or leased their automobiles from Toyota. On
15 the other hand, Toyota was aware of the defects and nonconformities at the time of
16 sale and thereafter.

17
18 1923. Acceptance was reasonably induced by the difficulty of discovery of the
19 defects and nonconformities before acceptance.

20 1924. There has been no change in the condition of Plaintiffs' vehicles not
21 caused by the defects and nonconformities.

22
23 1925. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
24 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
25 paid.

26 1926. Plaintiffs and the Class would suffer economic hardship if they returned
27 their vehicles but did not receive the return of all payments made by them. Because
28

1 Toyota is refusing to acknowledge any revocation of acceptance and return
2 immediately any payments made, Plaintiffs and the Class have not re-accepted their
3 Defective Vehicles by retaining them.

4 1927. These defects and nonconformities substantially impaired the value of
5 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
6 basic sources. First, the Defective Vehicles fail in their essential purpose because
7 they present an unreasonably high risk of sudden unintended acceleration (a risk
8 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
9 Second, the repair and adjust warranty has failed of its essential purpose because
10 Toyota cannot repair or adjust the Defective Vehicles.

11 1928. Plaintiffs and the Class, within a reasonable amount of time, provided
12 notice of their intent to seek revocation of acceptance by a class-action lawsuit
13 seeking such relief. In addition, Plaintiffs (and many Class members) have requested
14 that Toyota accept return of their vehicles and return all payments made. Plaintiffs
15 on behalf of themselves and the Class hereby demand revocation and tender their
16 Defective Vehicles.

17 1929. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them, as they must continue using them due to the
22 financial burden of securing alternative means of transport for an uncertain and
23 substantial period of time.

1 1930. Consequently, Plaintiffs and the Class are entitled to revoke their
2 acceptances, receive all payments made to Toyota, and to all incidental and
3 consequential damages, including the costs associated with purchasing safer vehicles,
4 and all other damages allowable under law, all in amounts to be proven at trial.
5

6 **COUNT V**
7 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
8 **(Based On Nevada Law)**

9 1931. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 1932. To the extent Toyota's repair or adjust commitment is deemed not to be
12 a warranty under Nevada's Commercial Code, Plaintiffs plead in the alternative
13 under common law warranty and contract law. Toyota limited the remedies available
14 to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in
15 materials or workmanship of any part supplied by Toyota, and/or warranted the
16 quality or nature of those services to Plaintiffs.
17

18 1933. Toyota breached this warranty or contract obligation by failing to repair
19 the Defective Vehicles evidencing a sudden unintended acceleration problem,
20 including those that were recalled, or to replace them.
21

22 1934. As a direct and proximate result of Defendants' breach of contract or
23 common law warranty, Plaintiffs and the Class have been damaged in an amount to
24 be proven at trial, which shall include, but is not limited to, all compensatory
25 damages, incidental and consequential damages, and other damages allowed by law.
26
27
28

COUNT VI

**BREACH OF IMPLIED COVENANT OF GOOD FAITH
AND FAIR DEALING**

(Based On Nevada Law)

1935. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1936. As set forth above, Plaintiffs and the Class have entered into individual sales transactions and agreements with Toyota for the purchase Toyota vehicles.

1937. Plaintiffs and the Class have fully performed their obligations with Toyota under such transactions and agreements.

1938. At all times, Toyota owed Plaintiffs and the Class a duty to exercise and act in good faith and deal fairly with them in the performance of repairs of Defective Vehicles.

1939. Toyota has breached these duties and obligations in the manner and particulars set forth above, including, but not limited to, failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

1940. As a direct and proximate result of Defendants' failure to abide and comply with their obligations and duties, Plaintiffs and the Class have suffered pecuniary damages in an amount that has not yet been determined.

COUNT VII

FRAUD BY CONCEALMENT

(Based On Nevada Law)

1941. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 1942. As set forth above, Defendants concealed and/or suppressed material
2 facts concerning the safety of their vehicles.

3 1943. Defendants had a duty to disclose these safety issues because they
4 consistently marketed their vehicles as safe and proclaimed that safety is one of
5 Toyota's highest corporate priorities. Once Defendants made representations to the
6 public about safety, Defendants were under a duty to disclose these omitted facts,
7 because where one does speak one must speak the whole truth and not conceal any
8 facts which materially qualify those facts stated. One who volunteers information
9 must be truthful, and the telling of a half-truth calculated to deceive is fraud.
10

11 1944. In addition, Defendants had a duty to disclose these omitted material
12 facts because they were known and/or accessible only to Defendants who have
13 superior knowledge and access to the facts, and Defendants knew they were not
14 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
15 were material because they directly impact the safety of the Defective Vehicles.
16 Whether or not a vehicle accelerates only at the driver's command, and whether a
17 vehicle will stop or not upon application of the brake by the driver, are material
18 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
19 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
20

21 1945. Defendants actively concealed and/or suppressed these material facts, in
22 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
23 Defective Vehicles at a higher price for the vehicles, which did not match the
24 vehicles' true value.
25

26 1946. Defendants still have not made full and adequate disclosure and
27 continue to defraud Plaintiffs and the Class.
28

1 1947. Plaintiffs and the Class were unaware of these omitted material facts
2 and would not have acted as they did if they had known of the concealed and/or
3 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
4 in exclusive control of the material facts and such facts were not known to the public
5 or the Class.
6

7 1948. Plaintiffs and the Class would not have purchased the vehicles sold by
8 Defendants or would have not paid as much for the vehicles purchased by
9 Defendants had they known the full truth about the vehicles being sold by
10 Defendants.
11

12 1949. As a result of the concealment and/or suppression of the facts, Plaintiffs
13 and the Class sustained damage.
14

15 1950. Defendants' acts were done maliciously, oppressively, deliberately, with
16 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
17 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
18 punitive damages in an amount sufficient to deter such conduct in the future, which
19 amount is to be determined according to proof.
20

21 **COUNT VIII**
22 **UNJUST ENRICHMENT**
23 **(Based On Nevada Law)**

24 1951. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.
26

27 1952. As a result of their wrongful and fraudulent acts and omissions, as set
28 forth above, pertaining to the design defect of their vehicles and the concealment of

1 the defect, Defendants charged a higher price for their vehicles than the vehicles'
2 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

3 1953. Defendants enjoyed the benefit of increased financial gains, to the
4 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
5 actually had lower values. It would be inequitable and unjust for Defendants to
6 retain these wrongfully obtained profits.
7

8 1954. Plaintiffs, therefore, seek an order establishing Defendants as
9 constructive trustees of the profits unjustly obtained, plus interest.

10 **NEW HAMPSHIRE**
11 **COUNT I**
12 **VIOLATION OF N.H. CONSUMER PROTECTION ACT**
13 **(N.H. Rev. Stat. Ann. § 358A:1, *et seq.*)**

14 1955. Plaintiffs reallege and incorporate by reference all paragraphs as though
15 fully set forth herein.
16

17 1956. The New Hampshire Consumer Protection Act (“CPA”) prohibits a
18 person, in the conduct of any trade or commerce, from doing any of the following:
19 “(V) Representing that goods or services have ... characteristics, ... uses, benefits, or
20 quantities that they do not have; ... (VII) Representing that goods or services are of a
21 particular standard, quality, or grade, ... if they are of another; ... and
22 (IX) Advertising goods or services with intent not to sell them as advertised.” N.H.
23 REV. STAT. § 358-A:2.
24

25 1957. Toyota is a person within the meaning of the CPA. *See* N.H. REV.
26 STAT. § 358A:1(I).
27
28

1 1958. In the course of Toyota's business, it willfully failed to disclose and
2 actively concealed the dangerous risk of throttle control failure and the lack of
3 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
4 described above. Accordingly, Toyota engaged in unlawful trade practices,
5 including representing that Defective Vehicles have characteristics, uses, benefits,
6 and qualities which they do not have; representing that Defective Vehicles are of a
7 particular standard and quality when they are not; and advertising Defective Vehicles
8 with the intent not to sell them as advertised. Toyota knew or should have known
9 that its conduct violated the OUTPA.
10

11 1959. Toyota engaged in a deceptive trade practice when it failed to disclose
12 material information concerning the Toyota vehicles which was known to Toyota at
13 the time of the sale. Toyota deliberately withheld the information about the vehicles'
14 propensity for rapid, uncontrolled acceleration in order to ensure that consumers
15 would purchase its vehicles and to induce the consumer to enter into a transaction.
16

17 1960. The propensity of the Toyotas for rapid, uncontrolled acceleration and
18 their lack of a fail-safe mechanism were material to Plaintiffs and the Class. Had
19 Plaintiffs and the Class known that their Toyotas had these serious safety defects,
20 they would not have purchased their Toyotas.
21

22 1961. Toyota's failure to disclose material information has injured Plaintiffs
23 and the Class. Plaintiffs and the Class overpaid for their vehicles and did not receive
24 the benefit of their bargain. The value of their Toyota's has diminished now that the
25 safety issues have come to light, and Plaintiffs and the Class own vehicles that are
26 not safe.
27
28

1 1962. Plaintiffs are entitled to recover the greater of actual damages or \$1,000
2 pursuant to N.H. REV. STAT. § 358-A:10. Plaintiffs are also entitled to treble
3 damages because Toyota acted willfully in its unfair and deceptive practices.

4
5 **COUNT II**
6 **BREACH OF EXPRESS WARRANTY**
7 **(N.H. Rev. Stat. Ann. § 382-A:2-313)**

8 1963. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 1964. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles under N.H. REV. STAT. § 382-A:2-313.

12 1965. In the course of selling its vehicles, Toyota expressly warranted in
13 writing that the Vehicles were covered by a Basic Warranty.

14 1966. Toyota breached the express warranty to repair and adjust to correct
15 defects in materials and workmanship of any part supplied by Toyota. Toyota has
16 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
17 materials and workmanship defects.

18
19 1967. In addition to this Basic Warranty, Toyota expressly warranted several
20 attributes, characteristics and qualities.

21
22 1968. These warranties are only a sampling of the numerous warranties that
23 Toyota made relating to safety, reliability and operation, which are more fully
24 outlined in Section IV.A., *supra*. Generally these express warranties promise
25 heightened, superior, and state-of-the-art safety, reliability, performance standards,
26 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
27 advertisements, in Toyota's "e brochures," and in uniform statements provided by
28

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 1969. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 1970. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 1971. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 1972. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses. The enforcement under these circumstances of any
26 limitations whatsoever precluding the recovery of incidental and/or consequential
27 damages is unenforceable.
28

1 1973. Moreover, many of the damages flowing from the Defective Vehicles
2 cannot be resolved through the limited remedy of “replacement or adjustments,” as
3 those incidental and consequential damages have already been suffered due to
4 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
5 continued failure to provide such limited remedy within a reasonable time, and any
6 limitation on Plaintiffs’ remedies would be insufficient to make whole.
7

8 1974. Finally, due to the Defendants’ breach of warranties as set forth herein,
9 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
10 in N.H. REV. STAT. §§ 382-A:2-608 and 382-A:2-711, for a revocation of acceptance
11 of the goods, and for a return to Plaintiffs and to the Class of the purchase price of all
12 vehicles currently owned and for such other incidental and consequential damages as
13 allowed under N.H. REV. STAT. §§ 382-A:2-608 and 382-A:2-711.
14

15 1975. Toyota was provided notice of these issues by numerous complaints
16 filed against it, including the instant complaint, and by numerous individual letters
17 and communications sent by Plaintiffs and the Class before or within a reasonable
18 amount of time after Toyota issued the recall and the allegations of vehicle defects
19 became public.
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21 1976. As a direct and proximate result of Toyota’s breach of express
22 warranties, Plaintiffs and the Class have been damaged in an amount to be
23 determined at trial.
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COUNT III

BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY

(N.H. Rev. Stat. Ann. § 382-A:2-314)

1977. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1978. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

1979. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

1980. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1981. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1982. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT IV
REVOCATION OF ACCEPTANCE
(N.H. Rev. Stat. Ann. § 382-A:2-608)

1983. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1984. Plaintiffs identified above demanded revocation and the demands were refused.

1985. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

1986. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

1987. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

1988. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

1989. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 1990. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 1991. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 1992. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 1993. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in N.H. Stat. § 382-A:2-608, for a revocation of acceptance of the goods, and for a
26 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
27 owned.
28

1 1994. Consequently, Plaintiffs and the Class are entitled to revoke their
2 acceptances, receive all payments made to Toyota, and to all incidental and
3 consequential damages, including the costs associated with purchasing safer
4 vehicles, and all other damages allowable under law, all in amounts to be proven at
5 trial.
6

7 **COUNT V**
8 **BREACH OF COMMON LAW WARRANTY**
9 **(Based On New Hampshire Law)**

10 1995. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 1996. To the extent Toyota's repair or adjust commitment is deemed not to be
13 a warranty under New Hampshire's Commercial Code, Plaintiffs plead in the
14 alternative under common law contract law. Toyota limited the remedies available
15 to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in
16 materials or workmanship of any part supplied by Toyota, and/or warranted the
17 quality or nature of those services to Plaintiffs.
18

19 1997. Toyota breached this contractual obligation by failing to repair the
20 Defective Vehicles evidencing a sudden unintended acceleration problem, including
21 those that were recalled, or to replace them.
22

23 1998. As a direct and proximate result of Defendants' breach of contract,
24 Plaintiffs and the Class have been damaged in an amount to be proven at trial, which
25 shall include, but is not limited to, all compensatory damages, incidental and
26 consequential damages, and other damages allowed by law.
27
28

COUNT VI

UNJUST ENRICHMENT

(Based On New Hampshire Law)

1999. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2000. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

2001. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

2002. Toyota appreciated, accepted and retained the non-gratuitous benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be unconscionable for Toyota to retain these wrongfully obtained profits.

2003. To the extent that no contract applies between the parties, Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

NEW JERSEY

COUNT I

VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT

(N.J. Stat. Ann. § 56:8-1, *et seq.*)

2004. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 2005. The New Jersey Consumer Fraud Act (“CFA”) makes unlawful “[t]he
2 act, use or employment by any person of any unconscionable commercial practice,
3 deception, fraud, false pretense, false promise, misrepresentation, or the knowing
4 concealment, suppression or omission of any material fact with the intent that others
5 rely upon such concealment, suppression or omission, in connection with the sale or
6 advertisement of any merchandise or real estate, or with the subsequent performance
7 of such person as aforesaid, whether or not any person has in fact been misled,
8 deceived or damaged thereby...” N.J. STAT. ANN. § 56:8-2.

9
10 2006. Toyota is a person within the meaning of the CFA. N.J. STAT. ANN.
11 § 56:8-1(d).

12
13 2007. In the course of Toyota’s business, it knowingly failed to disclose and
14 actively concealed the dangerous risk of throttle control failure and the lack of
15 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
16 described above. This was an unlawful practice in that Toyota represented that
17 Defective Vehicles have characteristics, uses, benefits, and qualities which they do
18 not have; represented that Defective Vehicles are of a particular standard and quality
19 when they are not; and advertised Defective Vehicles with the intent not to sell them
20 as advertised. Toyota knew or should have known that its conduct violated the CFA.

21
22 2008. Toyota engaged in an unlawful practice under the CFA when it failed to
23 disclose material information concerning the Toyota vehicles which was known to
24 Toyota at the time of the sale. Toyota deliberately withheld the information about the
25 vehicles’ propensity for rapid, uncontrolled acceleration in order to ensure that
26 consumers would purchase its vehicles and to induce the consumer to enter into a
27 transaction.
28

1 2009. Toyota's unlawful practices cause substantial injury to consumers.

2 2010. The propensity of the Toyotas for rapid, uncontrolled acceleration and
3 their lack of a fail-safe mechanism were material to Plaintiffs and the Class. Had
4 Plaintiffs and the Class known that their Toyotas had these serious safety defects,
5 they would not have purchased their Toyotas.
6

7 2011. Plaintiffs and the Class suffered ascertainable loss of money or property
8 caused by Toyota's unlawful practices. Plaintiffs and the Class overpaid for their
9 vehicles and did not receive the benefit of their bargain. The value of their Toyotas
10 has diminished now that the safety issues have come to light, and Plaintiffs and the
11 Class own vehicles that are not safe.
12

13 2012. Plaintiffs are entitled to recover legal and/or equitable relief, treble
14 damages, and reasonable attorneys' fees pursuant to N.J. STAT. ANN. § 56:8-19.

15 2013. Pursuant to N.J. STAT. ANN. § 56:8-20, Plaintiffs will mail a copy of the
16 complaint to New Jersey's Attorney General within ten (10) days of filing it with the
17 Court.
18

19 **COUNT II**
20 **BREACH OF EXPRESS WARRANTY**
21 **(N.J. Stat. Ann. § 12A:2-313)**

22 2014. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 2015. Toyota is and was at all relevant times a merchant with respect to motor
25 vehicles.

26 2016. In the course of selling its vehicles, Toyota expressly warranted in
27 writing that the Vehicles were covered by a Basic Warranty.
28

1 2017. Toyota breached the express warranty to repair and adjust to correct
2 defects in materials and workmanship of any part supplied by Toyota. Toyota has
3 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
4 materials and workmanship defects.

5 2018. In addition to this Basic Warranty, Toyota expressly warranted several
6 attributes, characteristics and qualities, as set forth above.

7 2019. These warranties are only a sampling of the numerous warranties that
8 Toyota made relating to safety, reliability and operation, which are more fully
9 outlined in Section IV.A., *supra*. Generally these express warranties promise
10 heightened, superior, and state-of-the-art safety, reliability, performance standards,
11 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
12 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
13 Toyota to be made by salespeople. These affirmations and promises were part of the
14 basis of the bargain between the parties.

15 2020. These additional warranties were also breached because the Defective
16 Vehicles were not fully operational, safe, or reliable (and remained so even after the
17 problems were acknowledged and a recall "fix" was announced), nor did they
18 comply with the warranties expressly made to purchasers or lessees. Toyota did not
19 provide at the time of sale, and has not provided since then, vehicles conforming to
20 these express warranties.

21 2021. Furthermore, the limited warranty of repair and/or adjustments to
22 defective parts, fails in its essential purpose because the contractual remedy is
23 insufficient to make the Plaintiffs and the Class whole and because the Defendants
24

1 have failed and/or have refused to adequately provide the promised remedies within
2 a reasonable time.

3 2022. Accordingly, recovery by the Plaintiffs is not limited to the limited
4 warranty of repair or adjustments to parts defective in materials or workmanship, and
5 Plaintiffs seek all remedies as allowed by law.
6

7 2023. Also, as alleged in more detail herein, at the time that Defendants
8 warranted and sold the vehicles they knew that the vehicles did not conform to the
9 warranties and were inherently defective, and Defendants wrongfully and
10 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
11 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
12 and/or fraudulent pretenses.
13

14 2024. Moreover, many of the damages flowing from the Defective Vehicles
15 cannot be resolved through the limited remedy of “replacement or adjustments,” as
16 those incidental and consequential damages have already been suffered due to their
17 failure and/or continued failure to provide such limited remedy within a reasonable
18 time, and any limitation on Plaintiffs’ and the Class’ remedies would be insufficient
19 to make Plaintiffs and the Class whole.
20

21 2025. Finally, due to the Defendants’ breach of warranties as set forth herein,
22 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set for in
23 N.J. STAT. ANN. § 12A:2-608, for revocation of acceptance of the goods, and for a
24 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
25 owned.
26

27 2026. Toyota was provided notice of these issues by numerous complaints
28 filed against it, including the instant complaint, and by numerous individual letters

1 and communications sent by Plaintiffs and the Class before or within a reasonable
2 amount of time after Toyota issued the recall and the allegations of vehicle defects
3 became public.

4 2027. As a direct and proximate result of Toyota's breach of express
5 warranties, Plaintiffs and the Class have been damaged in an amount to be
6 determined at trial.
7

8 **COUNT III**
9 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
10 **(N.J. Stat. Ann. § 12A:2-314)**

11 2028. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 2029. Toyota is and was at all relevant times a merchant with respect to motor
14 vehicles.
15

16 2030. A warranty that the Defective Vehicles were in merchantable condition
17 is implied by law in the instant transactions.

18 2031. These vehicles, when sold and at all times thereafter, were not in
19 merchantable condition and are not fit for the ordinary purpose for which cars are
20 used. Specifically, the Defective Vehicles are inherently defective in that there are
21 defects in the vehicle control systems that permit sudden unintended acceleration to
22 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
23 such SUA events, nor do they have a brake-override; and the ETCS system was not
24 adequately tested.
25

26 2032. Toyota was provided notice of these issues by numerous complaints
27 filed against it, including the instant complaint, and by numerous individual letters
28

1 and communications sent by Plaintiffs and the Class before or within a reasonable
2 amount of time after Toyota issued the recall and the allegations of vehicle defects
3 became public.

4 2033. As a direct and proximate result of Toyota's breach of the warranties of
5 merchantability, Plaintiffs and the Class have been damaged in an amount to be
6 proven at trial.
7

8 **COUNT IV**
9 **REVOCATION OF ACCEPTANCE**
10 **(N.J. Stat. Ann. § 12A:2-608)**

11 2034. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 2035. Plaintiffs identified above demanded revocation and the demands were
14 refused.
15

16 2036. Plaintiffs and the Class had no knowledge of such defects and
17 nonconformities, were unaware of these defects, and reasonably could not have
18 discovered them when they purchased or leased their automobiles from Toyota. On
19 the other hand, Toyota was aware of the defects and nonconformities at the time of
20 sale and thereafter.
21

22 2037. Acceptance was reasonably induced by the difficulty of discovery of the
23 defects and nonconformities before acceptance.

24 2038. There has been no change in the condition of Plaintiffs' vehicles not
25 caused by the defects and nonconformities.
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1 2039. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
2 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
3 paid.

4 2040. Plaintiffs and the Class would suffer economic hardship if they returned
5 their vehicles but did not receive the return of all payments made by them. Because
6 Toyota is refusing to acknowledge any revocation of acceptance and return
7 immediately any payments made, Plaintiffs and the Class have not re-accepted their
8 Defective Vehicles by retaining them.

9
10 2041. These defects and nonconformities substantially impaired the value of
11 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
12 basic sources. First, the Defective Vehicles fail in their essential purpose because
13 they present an unreasonably high risk of sudden unintended acceleration (a risk
14 acknowledged by Toyota's recall), rendering them unsafe in a material way. Second,
15 the repair and adjust warranty has failed of its essential purpose because Toyota
16 cannot repair or adjust the Defective Vehicles.

17
18 2042. Plaintiffs and the Class provided notice of their intent to seek revocation
19 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
20 (and many Class members) have requested that Toyota accept return of their vehicles
21 and return all payments made. Plaintiffs on behalf of themselves and the Class
22 hereby demand revocation and tender their Defective Vehicles.

23
24 2043. Plaintiffs and the Class would suffer economic hardship if they returned
25 their vehicles but did not receive the return of all payments made by them. Because
26 Toyota is refusing to acknowledge any revocation of acceptance and return
27 immediately any payments made, Plaintiffs and the Class have not re-accepted their
28

1 Defective Vehicles by retaining them, as they must continue using them due to the
2 financial burden of securing alternative means of transport for an uncertain and
3 substantial period of time.

4 2044. Consequently, Plaintiffs and the Class are entitled to revoke their
5 acceptances, receive all payments made to Toyota, and to all incidental and
6 consequential damages, including the costs associated with purchasing safer
7 vehicles, and all other damages allowable under law, all in amounts to be proven at
8 trial.
9

10 **COUNT V**
11 **BREACH OF CONTRACT**
12 **(Based On New Jersey Law)**

13 2045. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 2046. To the extent Toyota's repair or adjust commitment is deemed not to be
17 a warranty under New Jersey's Commercial Code, Plaintiffs plead in the alternative
18 under common law contract law. Toyota limited the remedies available to Plaintiffs
19 and the Class to just repairs and adjustments needed to correct defects in materials or
20 workmanship of any part supplied by Toyota, and/or warranted the quality or nature
21 of those services to Plaintiffs.
22

23 2047. Toyota breached this contract obligation by failing to repair the
24 Defective Vehicles evidencing a sudden unintended acceleration problem, including
25 those that were recalled, or to replace them.

26 2048. As a direct and proximate result of Defendants' breach of contract,
27 Plaintiffs and the Class have been damaged in an amount to be proven at trial, which
28

1 shall include, but is not limited to, all compensatory damages, incidental and
2 consequential damages, and other damages allowed by law.

3
4 **COUNT VI**
5 **IN THE ALTERNATIVE, UNJUST ENRICHMENT**
6 **(Based On New Jersey Law)**

7 2049. Plaintiffs reallege and incorporate by reference all paragraphs as though
8 fully set forth herein.

9 2050. Toyota had knowledge of the safety defects in its vehicles, which it
10 failed to disclose to Plaintiffs and the Class.

11 2051. As a result of its wrongful and fraudulent acts and omissions, as set
12 forth above, pertaining to the design defect of their vehicles and the concealment of
13 the defect, Toyota charged a higher price for its vehicles than the vehicles' true
14 value. Toyota accordingly received a benefit from Plaintiffs to Plaintiffs' detriment.
15

16 2052. Toyota appreciated, accepted and retained the benefits conferred by
17 Plaintiffs and the Class, who without knowledge of the safety defects paid a higher
18 price for vehicles which actually had lower values. It would be inequitable and
19 unjust for Toyota to retain these wrongfully obtained profits.

20 2053. Plaintiffs, therefore, are entitled to restitution and seek an order
21 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
22 interest.
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1 2060. These additional warranties were also breached because the Defective
2 Vehicles were not fully operational, safe, or reliable (and remained so even after the
3 problems were acknowledged and a recall “fix” was announced), nor did they
4 comply with the warranties expressly made to purchasers or lessees. Toyota did not
5 provide at the time of sale, and has not provided since then, vehicles conforming to
6 these express warranties.
7

8 2061. Furthermore, the limited warranty of repair and/or adjustments to
9 defective parts, fails in its essential purpose because the contractual remedy is
10 insufficient to make the Plaintiffs and the Class whole and because the Defendants
11 have failed and/or have refused to adequately provide the promised remedies within
12 a reasonable time.
13

14 2062. Accordingly, recovery by the Plaintiffs is not limited to the limited
15 warranty of repair or adjustments to parts defective in materials or workmanship, and
16 Plaintiffs seek all remedies as allowed by law.
17

18 2063. Also, as alleged in more detail herein, at the time that Defendants
19 warranted and sold the vehicles they knew that the vehicles did not conform to the
20 warranties and were inherently defective, and Defendants wrongfully and
21 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
22 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
23 and/or fraudulent pretenses. The enforcement under these circumstances of any
24 limitations whatsoever precluding the recovery of incidental and/or consequential
25 damages is unenforceable.
26

27 2064. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to
2 Defendants' fraudulent conduct as alleged herein, and due to their failure and/or
3 continued failure to provide such limited remedy within a reasonable time, and any
4 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
5 Plaintiffs and the Class whole.
6

7 2065. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in N.M. STAT. ANN. § 55-2-711, for a revocation of acceptance of the goods, and for
10 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
11 owned and for such other incidental and consequential damages as allowed under
12 N.M. STAT. ANN. §§ 55-2-711 and 55-2-608.
13

14 2066. Toyota was provided notice of these issues by numerous complaints
15 filed against it, including the instant complaint, and by numerous individual letters
16 and communications sent by Plaintiffs and the Class before or within a reasonable
17 amount of time after Toyota issued the recall and the allegations of vehicle defects
18 became public.
19

20 2067. As a direct and proximate result of Toyota's breach of express
21 warranties, Plaintiffs and the Class have been damaged in an amount to be
22 determined at trial.
23

24 **COUNT II**
25 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
26 **(N.M. Stat. Ann. § 55-2-314)**

27 2068. Plaintiffs reallege and incorporate by reference all paragraphs as though
28 fully set forth herein.

1 2069. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles under N.M. STAT. ANN. § 55-2-104.

3 2070. A warranty that the Defective Vehicles were in merchantable condition
4 was implied by law in the instant transaction, pursuant to N.M. STAT. ANN. § 55-2-
5 314.
6

7 2071. These vehicles, when sold and at all times thereafter, were not in
8 merchantable condition and are not fit for the ordinary purpose for which cars are
9 used. Specifically, the Defective Vehicles are inherently defective in that there are
10 defects in the vehicle control systems that permit sudden unintended acceleration to
11 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
12 such SUA events, nor do they have a brake-override; and the ETCS system was not
13 adequately tested.
14

15 2072. Toyota was provided notice of these issues by numerous complaints
16 filed against it, including the instant complaint, and by numerous individual letters
17 and communications sent by Plaintiffs and the Class before or within a reasonable
18 amount of time after Toyota issued the recall and the allegations of vehicle defects
19 became public.
20

21 2073. As a direct and proximate result of Toyota's breach of the warranties of
22 merchantability, Plaintiffs and the Class have been damaged in an amount to be
23 proven at trial.
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COUNT III
REVOCATION OF ACCEPTANCE
(N.M. Stat. Ann. § 55-2-608)

2074. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2075. Plaintiffs identified above demanded revocation and the demands were refused.

2076. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

2077. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

2078. There has been no substantial change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

2079. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

2080. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 2081. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 2082. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 2083. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 2084. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in N.M. STAT. ANN. § 55-2-711, for a revocation of acceptance of the goods, and for
26 a return to Plaintiffs and to the Class of the purchase price of all vehicles currently
27
28

1 owned and for such other incidental and consequential damages as allowed under
2 N.M. STAT. ANN. § 55-2-711.

3 2085. Consequently, Plaintiffs and the Class are entitled to revoke their
4 acceptances, receive all payments made to Toyota, and to all incidental and
5 consequential damages, including the costs associated with purchasing safer vehicles,
6 and all other damages allowable under law, all in amounts to be proven at trial.

8 **COUNT IV**

9 **BREACH OF CONTRACT/Common Law Warranty**

10 **(Based On New Mexico Laws)**

11 2086. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 2087. To the extent Toyota's repair or adjust commitment is deemed not to be
14 a warranty under the Uniform Commercial Code as adopted in New Mexico,
15 Plaintiffs plead in the alternative under common law warranty and contract law.
16 Toyota limited the remedies available to Plaintiffs and the Class to just repairs and
17 adjustments needed to correct defects in materials or workmanship of any part
18 supplied by Toyota, and/or warranted the quality or nature of those services to
19 Plaintiffs.
20

21 2088. Toyota breached this warranty or contract obligation by failing to repair
22 the Defective Vehicles evidencing a sudden unintended acceleration problem,
23 including those that were recalled, or to replace them.
24

25 2089. As a direct and proximate result of Defendants' breach of contract or
26 common law warranty, Plaintiffs and the Class have been damaged in an amount to
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1 be proven at trial, which shall include, but is not limited to, all compensatory
2 damages, incidental and consequential damages, and other damages allowed by law.

3 2090. Defendants' breaches were malicious, fraudulent, oppressive, or
4 committed recklessly with wanton disregard for the rights of the Plaintiffs and the
5 Class. Accordingly, as Defendants have acted with the requisite culpable state of
6 mind, the Plaintiffs and the Class seek exemplary damages against Defendants in an
7 amount to be determined at trial.
8

9 **COUNT V**
10 **FRAUD BY CONCEALMENT**
11 **(Based On New Mexico Law)**

12 2091. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 2092. As set forth above, Defendants concealed and/or suppressed material
15 facts concerning the safety of their vehicles.
16

17 2093. Defendants had a duty to disclose these safety issues because they
18 consistently marketed their vehicles as safe and proclaimed that safety is one of
19 Toyota's highest corporate priorities. Once Defendants made representations to the
20 public about safety, Defendants were under a duty to disclose these omitted facts,
21 because where one does speak one must speak the whole truth and not conceal any
22 facts which materially qualify those facts stated. One who volunteers information
23 must be truthful, and the telling of a half-truth calculated to deceive is fraud.
24

25 2094. In addition, Defendants had a duty to disclose these omitted material
26 facts because they were known and/or accessible only to Defendants who have
27 superior knowledge and access to the facts, and Defendants knew they were not
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1 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
2 were material because they directly impact the safety of the Defective Vehicles.
3 Whether or not a vehicle accelerates only at the driver's command, and whether a
4 vehicle will stop or not upon application of the brake by the driver, are material
5 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
6 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
7

8 2095. Defendants actively concealed and/or suppressed these material facts, in
9 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
10 Defective Vehicles at a higher price for the vehicles, which did not match the
11 vehicles' true value.
12

13 2096. Defendants still have not made full and adequate disclosure and
14 continue to defraud Plaintiffs and the Class.

15 2097. Plaintiffs and the Class were unaware of these omitted material facts
16 and would not have acted as they did if they had known of the concealed and/or
17 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
18 in exclusive control of the material facts and such facts were not known to the public
19 or the Class.
20

21 2098. As a result of the concealment and/or suppression of the facts, Plaintiffs
22 and the Class sustained damage. For those Plaintiffs and the Class who elect to
23 affirm the sale, these damages include the difference between the actual value of that
24 which Plaintiffs and the Class paid and the actual value of that which they received,
25 together with additional damages arising from the sales transaction, amounts
26 expended in reliance upon the fraud, compensation for loss of use and enjoyment of
27 the property, and/or lost profits. For those Plaintiffs and the Class who want to
28

1 rescind the purchase, then those Plaintiffs and the Class are entitled to restitution and
2 consequential damages.

3 2099. Defendants' acts were done maliciously, oppressively, deliberately, with
4 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
5 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
6 punitive damages in an amount sufficient to deter such conduct in the future, which
7 amount is to be determined according to proof.

9 **COUNT VI**
10 **UNJUST ENRICHMENT**
11 **(Based On New Mexico Law)**

12 2100. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 2101. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Defendants charged a higher price for their vehicles than the vehicles'
17 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

18 2102. Defendants enjoyed the benefit of increased financial gains, to the
19 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
20 actually had lower values. Defendants knowingly benefited at the expense of
21 Plaintiffs and the Class. It would be inequitable and unjust for Defendants to retain
22 these wrongfully obtained profits.

23 2103. Plaintiffs, therefore, seek an order establishing Defendants as
24 constructive trustees of the profits unjustly obtained, plus interest.
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COUNT VII

**VIOLATIONS OF THE NEW MEXICO
UNFAIR TRADE PRACTICES ACT**

(N.M. Stat. Ann. §§ 57-12-1, *et seq.*)

2104. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2105. Defendants' above-described acts and omissions constitute unfair or deceptive acts or practices under the New Mexico Unfair Trade Practices Act, N.M. STAT. ANN. §§ 57-12-1, *et seq.* ("New Mexico UTPA").

2106. By failing to disclose and actively concealing the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS, Defendants engaged in deceptive business practices prohibited by the New Mexico UTPA, including (1) representing that Defective Vehicles have characteristics and benefits, which they do not have, (2) representing that Defective Vehicles are of a particular standard, quality, and grade when they are not, (3) using exaggeration as to a material fact and by doing so deceiving or tending to deceive, (4) failing to state a material fact and by doing so deceiving or tending to deceive, and (5) representing that a transaction involving Defective Vehicles confers or involves rights, remedies, and obligations which it does not.

2107. As alleged above, Defendants made numerous material statements about the safety and reliability of Defective Vehicles that were either false or misleading. Each of these statements contributed to the deceptive context of TMC's and TMS's unlawful advertising and representations as a whole.

2108. Defendants took advantage of the lack of knowledge, ability, experience, and capacity of Plaintiffs and the Class to a grossly unfair degree. Defendants' actions resulted in a gross disparity between the value received and the price paid by Plaintiffs and the Class. Defendants' actions constitute unconscionable actions under § 57-12-2(E) of the New Mexico UTPA.

2109. Plaintiffs and the Class sustained damages as a result of the Defendants' unlawful acts and are, therefore, entitled to damages and other relief provided for under § 57-12-10 of the New Mexico UTPA. Because Defendants' conduct was committed willfully, Plaintiffs and the Class seek treble damages.

2110. Plaintiffs and the Class also seek court costs and attorneys' fees under § 57-12-10(C) of the New Mexico UTPA.

COUNT VIII

**VIOLATIONS OF THE NEW MEXICO
MOTOR VEHICLE DEALERS FRANCHISING ACT**

(N.M. Stat. Ann. §§ 57-16-1, *et seq.*)

2111. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2112. As alleged above, Defendants used false, misleading, and deceptive advertising in connection with their business in violation of the New Mexico Motor Vehicle Dealers Franchising Act, N.M. STAT. ANN. §§ 57-16-1, *et seq.* (“New Mexico MVDFA”).

2113. Plaintiffs and the Class sustained damages as a result of the Defendants' unlawful acts and are, therefore, entitled to damages and other relief provided for

1 under § 57-16-13 of the New Mexico MVDFA. Because Defendants' conduct was
2 committed maliciously, Plaintiffs and the Class seek treble damages.

3 2114. Plaintiffs and the Class also seek court costs and attorneys' fees under
4 § 57-16-13 of the New Mexico MVDFA.

5
6 **NEW YORK**
7 **COUNT I**
8 **DECEPTIVE ACTS OR PRACTICES**
9 **(N.Y. Gen. Bus. Law § 349)**

10 2115. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2116. This Count is asserted by plaintiff and class members who (a) suffered
13 an SUA event or (b) sold their vehicle at a loss after September 2009.

14 2117. New York General Business Law ("G.B.L.") § 349 makes unlawful
15 "[d]eceptive acts or practices in the conduct of any business, trade or commerce."
16

17 2118. In the course of Toyota's business, it willfully failed to disclose and
18 actively concealed the dangerous risk of throttle control failure and the lack of
19 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
20 described above. Accordingly, Toyota made untrue, deceptive or misleading
21 representations of material facts to and omitted and/or concealed material facts.
22

23 2119. Toyota engaged in a deceptive acts or practices when it failed to
24 disclose material information concerning the Toyota vehicles which was known to
25 Toyota at the time of the sale. Toyota deliberately withheld the information about
26 the vehicles' propensity for rapid, uncontrolled acceleration, and the vehicle's
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1 quality, reliability and safety issues in order to ensure that consumers would
2 purchase its vehicles and to induce the consumer to enter into a transaction.

3 2120. The propensity of the Toyotas for rapid, uncontrolled acceleration, and
4 their lack of a fail-safe mechanism, and the related issues regarding quality,
5 reliability and safety were material to Plaintiffs and the Class. Had Plaintiffs and the
6 Class known that their Toyotas had these serious safety, quality and reliability issues,
7 they would not have purchased their Toyotas.
8

9 2121. Because Toyota's deception takes place in the context of automobile
10 safety, that deception affects the public interest.
11

12 2122. Toyota's unlawful conduct constitutes unfair acts or practices that have
13 the capacity to and that do deceive consumers and have a broad impact on consumers
14 at large.

15 2123. Plaintiffs and the Class suffered injury caused by Toyota's failure to
16 disclose material information. Plaintiffs and the Class overpaid for their vehicles and
17 did not receive the benefit of their bargain. The value of their Toyota's has
18 diminished now that the safety issues have come to light, and Plaintiffs and the Class
19 own vehicles that are not safe.
20

21 2124. Pursuant to G.B.L. § 349, Plaintiffs are entitled to recover the greater of
22 actual damages or \$50. Because Toyota acted willfully or knowingly, Plaintiffs are
23 entitled to recover three times actual damages, up to \$1,000.
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COUNT II
FALSE ADVERTISING
(N.Y. Gen. Bus. Law § 350)

2125. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2126. This Count is asserted by plaintiff and class members who (a) suffered an SUA event or (b) sold their vehicle at a loss after September 2009.

2127. New York G.B.L. § 350 makes unlawful “[f]alse advertising in the conduct of any business, trade or commerce....” False advertising includes “advertising, including labeling, of a commodity ... if such advertising is misleading in a material respect,” taking into account “the extent to which the advertising fails to reveal facts material in the light of ... representations [made] with respect to the commodity....” N.Y. G.B.L. § 350-a.

2128. Defendants caused to be made or disseminated through New York, through advertising, marketing and other publications, statements that were untrue or misleading, and which were known, or which by the exercise of reasonable care should have been known to Defendants, to be untrue and misleading to consumers and Plaintiffs.

2129. Defendants have violated § 350 because the misrepresentations and omissions regarding the safety, quality and reliability of their vehicles as set forth in this Complaint were material and likely to deceive a reasonable consumer.

2130. Plaintiffs and the Class have suffered an injury, including the loss of money or property, as a result of Defendants’ false advertising. In purchasing or leasing their vehicles, the Plaintiffs and the Class relied on the misrepresentations

1 and/or omissions of Toyota with respect to the safety, quality and reliability of the
2 vehicles. Toyota's representations turned out not to be true because the vehicles can
3 unexpectedly and dangerously accelerate out of the drivers' control. Had the
4 Plaintiffs and the Class known this, they would not have purchased or leased their
5 Defective Vehicles and/or paid as much for them.
6

7 2131. Accordingly, the Plaintiffs and the Class overpaid for their Defective
8 Vehicles and did not receive the benefit of the bargain for their Defective Vehicles,
9 which have also suffered a diminution in value.

10 2132. Plaintiffs request that this Court enter such orders or judgments as may
11 be necessary to enjoin Defendants from continuing their unfair, unlawful, and/or
12 deceptive practices. Plaintiffs and the Class are also entitled to recover their actual
13 damages or \$500, whichever is greater. Because Toyota acted willfully or
14 knowingly, Plaintiffs are entitled to recover three times actual damages, up to
15 \$10,000.
16

17 **COUNT III**
18 **BREACH OF EXPRESS WARRANTY**
19 **(N.Y. U.C.C. § 2-313)**

20 2133. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.
22

23 2134. This Count is asserted by plaintiffs and class members who
24 (a) experienced SUA or (b) sold at a loss after September 2009 and (c) presented
25 their vehicle to a dealer for repair.

26 2135. TMS is and was at all relevant times a merchant with respect to motor
27 vehicles under N.Y. U.C.C. § 2-313.
28

1 2136. The vehicles sold by Toyota are “things of danger,” in that they are of
2 such a character that when used for the purpose for which they are made they are
3 likely to be a source of danger to several or many people if not properly designed
4 and fashioned.

5 2137. In the course of selling its vehicles, Toyota expressly warranted in
6 writing that the Vehicles were covered by a Basic Warranty.

7 2138. Toyota breached the express warranty to repair and adjust to correct
8 defects in materials and workmanship of any part supplied by Toyota. Toyota has
9 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles’
10 materials and workmanship defects.

11 2139. In addition to this Basic Warranty, Toyota expressly warranted several
12 attributes, characteristics and qualities, as set forth above.

13 2140. These warranties are only a sampling of the numerous warranties that
14 Toyota made relating to safety, reliability and operation, which are more fully
15 outlined in Section IV.A., *supra*. Generally these express warranties promise
16 heightened, superior, and state-of-the-art safety, reliability, performance standards,
17 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
18 advertisements, in Toyota’s “e brochures,” and in uniform statements provided by
19 Toyota to be made by salespeople. These affirmations and promises were part of the
20 basis of the bargain between the parties.

21 2141. These additional warranties were also breached because the Defective
22 Vehicles were not fully operational, safe, or reliable (and remained so even after the
23 problems were acknowledged and a recall “fix” was announced), nor did they
24 comply with the warranties expressly made to purchasers or lessees. Toyota did not

1 provide at the time of sale, and has not provided since then, vehicles conforming to
2 these express warranties.

3 2142. Furthermore, the limited warranty of repair and/or adjustments to
4 defective parts, fails in its essential purpose because the contractual remedy is
5 insufficient to make the Plaintiffs and the Class whole and because the Defendants
6 have failed and/or have refused to adequately provide the promised remedies within
7 a reasonable time.
8

9 2143. Accordingly, recovery by the Plaintiffs is not limited to the limited
10 warranty of repair or adjustments to parts defective in materials or workmanship, and
11 Plaintiffs seek all remedies as allowed by law.
12

13 2144. Also, as alleged in more detail herein, at the time that Defendants
14 warranted and sold the vehicles they knew that the vehicles did not conform to the
15 warranties and were inherently defective, and Defendants wrongfully and
16 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
17 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
18 and/or fraudulent pretenses. The enforcement under these circumstances of any
19 limitations whatsoever precluding the recovery of incidental and/or consequential
20 damages is unenforceable.
21

22 2145. Moreover, many of the damages flowing from the Defective Vehicles
23 cannot be resolved through the limited remedy of “replacement or adjustments,” as
24 those incidental and consequential damages have already been suffered due to
25 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
26 continued failure to provide such limited remedy within a reasonable time, and any
27 limitation on Plaintiffs’ remedies would be insufficient to make whole.
28

1 2146. Toyota was provided notice of these issues by numerous complaints
2 filed against it, including the instant complaint, and by numerous individual letters
3 and communications sent by Plaintiffs and the Class before or within a reasonable
4 amount of time after Toyota issued the recall and the allegations of vehicle defects
5 became public.
6

7 2147. As a direct and proximate result of Toyota's breach of express
8 warranties, Plaintiffs and the Class have been damaged in an amount to be
9 determined at trial.

10 **COUNT IV**
11 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**
12 **(N.Y. U.C.C. § 2-314)**

13 2148. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 2149. This Count is asserted on behalf of plaintiffs and class members who
17 (a) suffered SUA or (b) sold their vehicle at a loss after September 2009, and (c) who
18 presented their vehicle for repair.

19 2150. Toyota is and was at all relevant times a merchant with respect to motor
20 vehicles.
21

22 2151. The vehicles sold by Toyota are "things of danger," in that they are of
23 such a character that when used for the purpose for which they are made they are
24 likely to be a source of danger to several or many people if not properly designed
25 and fashioned.

26 2152. A warranty that the Defective Vehicles were in merchantable condition
27 is implied by law in the instant transactions.
28

2154. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

COUNT V

2156. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2159. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

COUNT VI
FRAUD BY CONCEALMENT
(Based On New York Law)

2162. This Count is brought by Plaintiffs who had an SUA and/or who sold at a loss after September 2009.

1 about safety, quality and reliability, Defendants were under a duty to disclose these
2 omitted facts, because where one does speak one must speak the whole truth and not
3 conceal any facts which materially qualify those facts stated. One who volunteers
4 information must be truthful, and the telling of a half-truth calculated to deceive is
5 fraud.
6

7 2164. In addition, Defendants had a duty to disclose these omitted material
8 facts because they were known and/or accessible only to Defendants who have
9 superior knowledge and access to the facts, and Defendants knew they were not
10 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
11 were material because they directly impact the safety, quality and reliability of the
12 Defective Vehicles. Whether or not a vehicle accelerates only at the driver's
13 command, and whether a vehicle will stop or not upon application of the brake by
14 the driver, are material safety concerns. Whether or not a vehicle has been designed
15 and manufactured according to safety and company standard is material to a
16 reasonable consumer. Defendants possessed exclusive knowledge of the defects
17 rendering Defective Vehicles inherently more dangerous and unreliable than similar
18 vehicles.
19
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21 2165. Defendants actively concealed and/or suppressed these material facts, in
22 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
23 Toyotas at a higher price for the vehicles, which did not match the vehicles' true
24 value.
25

26 2166. Defendants still have not made full and adequate disclosure and
27 continue to defraud Plaintiffs and the Class.
28

1 2167. Plaintiffs and the Class were unaware of these omitted material facts
2 and would not have acted as they did if they had known of the concealed and/or
3 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
4 in exclusive control of the material facts and such facts were not known to the public
5 or the Class.
6

7 2168. As a result of the concealment and/or suppression of the facts, Plaintiffs
8 and the Class sustained damage. For those Plaintiffs and the Class who elect to
9 affirm the sale, these damages, include the difference between the actual value of
10 that which Plaintiffs and the Class paid and the actual value of that which they
11 received, together with additional damages arising from the sales transaction,
12 amounts expended in reliance upon the fraud, compensation for loss of use and
13 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
14 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
15 restitution and consequential damages.
16

17 2169. Defendants' acts were done maliciously, oppressively, deliberately, with
18 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
19 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
20 punitive damages in an amount sufficient to deter such conduct in the future, which
21 amount is to be determined according to proof.
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NORTH CAROLINA

COUNT I

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(N.C. Gen. Stat. § 25-2-314)

2170. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2171. Toyota is and was at all relevant times a merchant with respect to motor vehicles under N.C. GEN. STAT. § 25-2-314.

2172. A warranty that the Defective Vehicles were in merchantable condition was implied by law in the instant transaction, pursuant to N.C. GEN. STAT. § 25-2-314.

2173. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which vehicles are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2174. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

1 2175. As a direct and proximate result of Toyota's breach of the warranties of
2 merchantability, Plaintiffs and the Class have been damaged in an amount to be
3 proven at trial.

4
5 **COUNT II**
6 **FRAUD BY CONCEALMENT**
7 **(Based On North Carolina Law)**

8 2176. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 2177. As set forth above, Defendants concealed and/or suppressed material
11 facts concerning the safety of their vehicles, which they were legally obligated to
12 disclose.

13 2178. Defendants had a duty to disclose these safety issues because they
14 consistently marketed their vehicles as safe and proclaimed that safety is one of
15 Toyota's highest corporate priorities. Once Defendants made representations to the
16 public about safety, Defendants were under a duty to disclose these omitted facts,
17 because where one does speak one must speak the whole truth and not conceal any
18 facts which materially qualify those facts stated. One who volunteers information
19 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

20
21 2179. In addition, Defendants had a duty to disclose these omitted material
22 facts because they were known and/or accessible only to Defendants who have
23 superior knowledge and access to the facts, and Defendants knew they were not
24 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
25 were material because they directly impact the safety of the Defective Vehicles.
26 Whether or not a vehicle accelerates only at the driver's command, and whether a
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1 vehicle will stop or not upon application of the brake by the driver, are material
2 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
3 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

4 2180. Defendants actively concealed and/or suppressed these material facts, in
5 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
6 Defective Vehicles at a higher price for the vehicles, which did not match the
7 vehicles' true value.
8

9 2181. Defendants still have not made full and adequate disclosure and
10 continue to defraud Plaintiffs and the Class.

11 2182. Plaintiffs and the Class were unaware of these omitted material facts
12 and would not have acted as it did if they had known of the concealed and/or
13 suppressed facts. Plaintiffs and the Class' actions were justified. Defendants were in
14 exclusive control of the material facts and such facts were not known to the public or
15 to Plaintiffs and the Class.
16

17 2183. As a result of the concealment and/or suppression of the facts, Plaintiffs
18 and the Class sustained damage. For those Plaintiffs and the Class who elect to
19 affirm the sale, these damages include the difference between the actual value of that
20 which Plaintiffs and the Class paid and the actual value of that which they received,
21 together with additional damages arising from the sales transaction, amounts
22 expended in reliance upon the fraud, compensation for loss of use and enjoyment of
23 the property, and/or lost profits. For those Plaintiffs and the Class who want to
24 rescind the purchase, then those Plaintiffs and the Class are entitled to restitution and
25 consequential damages.
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COUNT III
UNJUST ENRICHMENT
(Based On North Carolina Law)

2186. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Defendants charged a higher price for their vehicles than the vehicles' true value and Defendants obtained monies which rightfully belong to Plaintiffs.

2188. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

COUNT IV

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On North Carolina Law)

2189. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2190. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under North Carolina's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

2191. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

2192. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

NORTH DAKOTA

COUNT I

BREACH OF EXPRESS WARRANTY

(N.D. Cent. Code. § 41-02-30)

2193. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2194. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

2195. In the course of selling its vehicles, Toyota expressly warranted in writing that the Vehicles were covered by a Basic Warranty.

2196. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the Vehicles' materials and workmanship defects.

2197. In addition to this Basic Warranty, Toyota expressly warranted several attributes, characteristics and qualities, as set forth above.

2198. These warranties are only a sampling of the numerous warranties that Toyota made relating to safety, reliability and operation, which are more fully outlined in Section IV.A., *supra*. Generally these express warranties promise heightened, superior, and state-of-the-art safety, reliability, performance standards, and promote the benefits of ETCS. These warranties were made, *inter alia*, in advertisements, in Toyota’s “e brochures,” and in uniform statements provided by Toyota to be made by salespeople. These affirmations and promises were part of the basis of the bargain between the parties.

2199. These additional warranties were also breached because the Defective Vehicles were not fully operational, safe, or reliable (and remained so even after the problems were acknowledged and a recall “fix” was announced), nor did they comply with the warranties expressly made to purchasers or lessees. Toyota did not provide at the time of sale, and has not provided since then, vehicles conforming to these express warranties.

1 2200. Furthermore, the limited warranty of repair and/or adjustments to
2 defective parts, fails in its essential purpose because the contractual remedy is
3 insufficient to make the Plaintiffs and the Class whole and because the Defendants
4 have failed and/or have refused to adequately provide the promised remedies within
5 a reasonable time.
6

7 2201. Accordingly, recovery by the Plaintiffs is not limited to the limited
8 warranty of repair or adjustments to parts defective in materials or workmanship, and
9 Plaintiffs seek all remedies as allowed by law.

10 2202. Also, as alleged in more detail herein, at the time that Defendants
11 warranted and sold the vehicles they knew that the vehicles did not conform to the
12 warranties and were inherently defective, and Defendants wrongfully and
13 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
14 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
15 and/or fraudulent pretenses.
16

17 2203. Moreover, many of the damages flowing from the Defective Vehicles
18 cannot be resolved through the limited remedy of “replacement or adjustments,” as
19 those incidental and consequential damages have already been suffered due to
20 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
21 continued failure to provide such limited remedy within a reasonable time, and any
22 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
23 Plaintiffs and the Class whole.
24

25 2204. Finally, due to the Defendants’ breach of warranties as set forth herein,
26 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
27 in N.D. CENT. CODE § 41-02-71 (2-608), for a revocation of acceptance of the goods,
28

1 and for a return to Plaintiffs and to the Class of the purchase price of all vehicles
2 currently owned.

3 2205. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 2206. As a direct and proximate result of Toyota's breach of express
10 warranties, Plaintiffs and the Class have been damaged in an amount to be
11 determined at trial.
12

13 **COUNT II**

14 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

15 **(N.D. Cent. Code § 41-02-31)**

16 2207. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2208. Toyota is and was at all relevant times a merchant with respect to motor
19 vehicles.

20 2209. A warranty that the Defective Vehicles were merchantable is implied by
21 law in the instant transactions.
22

23 2210. These vehicles, when sold and at all times thereafter, were not
24 merchantable and are not fit for the ordinary purpose for which cars are used.
25 Specifically, the Defective Vehicles are inherently defective in that there are defects
26 in the vehicle control systems that permit sudden unintended acceleration to occur;
27 the Defective Vehicles do not have an adequate fail-safe to protect against such SUA
28

1 events, nor do they have a brake-override; and the ETCS system was not adequately
2 tested.

3 2211. As a direct and proximate result of Toyota's breach of the warranties of
4 merchantability, Plaintiffs and the Class have been damaged in an amount to be
5 proven at trial.
6

7 **COUNT III**
8 **UNJUST ENRICHMENT**
9 **(Based On North Dakota Law)**

10 2212. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2213. Toyota had knowledge of the safety defects in its vehicles, which it
13 failed to disclose to Plaintiffs and the Class.

14 2214. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
17 value and Toyota was enriched.

18 2215. As a result of their wrongful and fraudulent acts and omissions, as set
19 forth above, pertaining to the design defect of their vehicles and the concealment of
20 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
21 value and Plaintiffs were impoverished.
22

23 2216. As a result of their wrongful and fraudulent acts and omissions, as set
24 forth above, pertaining to the design defect of their vehicles and the concealment of
25 the defect, Toyota obtained monies which rightfully belong to Plaintiffs.
26
27
28

1 2217. No justification exists for Toyota's enrichment at the expense of
2 Plaintiffs' impoverishment.

3 2218. There is an absence of an equal or better remedy at law for Toyota's
4 actions.

5
6 **COUNT IV**
7 **VIOLATION OF THE NORTH DAKOTA CONSUMER FRAUD ACT**
8 **(N.D. Cent. Code § 51-15-02)**

9 2219. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 2220. The conduct of Toyota as set forth herein constitutes deceptive acts or
12 practices, fraud, and misrepresentation, including, but not limited to, Toyota's
13 manufacture and sale of vehicles with a sudden acceleration defect that lack brake-
14 override or other effective fail-safe mechanisms which Toyota failed to adequately
15 investigate, disclose and remedy, and Toyota's misrepresentations and omissions
16 regarding the safety and reliability of its vehicles.

17
18 2221. Plaintiffs and the Class were injured as a result of Defendant's conduct.
19 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
20 their bargain, and their vehicles have suffered a diminution in value.

21 2222. Toyota's conduct proximately caused the injuries to Plaintiffs and the
22 Class.

23
24 2223. Further, Toyota knowingly committed the conduct described above, and
25 thus, under N.D. CENT. CODE § 51-15-09, Toyota is liable to Plaintiffs and the Class
26 for treble damages in amounts to be proven at trial, as well as attorneys' fees, costs,
27 and disbursements.

COUNT V
REVOCATION OF ACCEPTANCE
(N.D. Cent. Code § 41-02-71 (2-608))

2224. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2225. Plaintiffs identified above demanded revocation and the demands were refused.

2226. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

2227. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

2228. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

2229. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

2230. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 2231. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 2232. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 2233. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 2234. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy for a
25 revocation of acceptance of the goods, and for a return to Plaintiffs and to the Class
26 of the purchase price of all vehicles currently owned.
27
28

COUNT VI
BREACH OF CONTRACT/COMMON LAW WARRANTY
(Based On North Dakota Law)

2237. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under North Dakota's Century Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

2239. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VII
FRAUD BY CONCEALMENT
(Based On North Dakota Law)

2240. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2241. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety of their vehicles.

2242. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

2243. In addition, Defendants had a duty to disclose these omitted material facts because they were known and/or accessible only to Defendants who have superior knowledge and access to the facts, and Defendants knew they were not known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts were material because they directly impact the safety of the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's command, and whether a vehicle will stop or not upon application of the brake by the driver, are material safety concerns. Defendants possessed exclusive knowledge of the defects rendering Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

1 2244. Defendants actively concealed and/or suppressed these material facts, in
2 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
3 Defective Vehicles at a higher price for the vehicles, which did not match the
4 vehicles' true value.

5 2245. Defendants still have not made full and adequate disclosure and
6 continue to defraud Plaintiffs and the Class.
7

8 2246. Plaintiffs and the Class were unaware of these omitted material facts
9 and would not have acted as they did if they had known of the concealed and/or
10 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
11 in exclusive control of the material facts and such facts were not known to the public
12 or the Class.
13

14 2247. As a result of the concealment and/or suppression of the facts, Plaintiffs
15 and the Class sustained damage. For those Plaintiffs and the Class who elect to
16 affirm the sale, these damages, include the difference between the actual value of
17 that which Plaintiffs and the Class paid and the actual value of that which they
18 received, together with additional damages arising from the sales transaction,
19 amounts expended in reliance upon the fraud, compensation for loss of use and
20 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
21 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
22 restitution and consequential damages.
23

24 2248. Defendants' acts were done maliciously, oppressively, deliberately, with
25 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
26 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
27
28

1 punitive damages in an amount sufficient to deter such conduct in the future, which
2 amount is to be determined according to proof.

3 **OHIO**

4 **COUNT I**

5 **VIOLATION OF OHIO CONSUMER SALES PRACTICES ACT**

6 **(Ohio Rev. Code Ann. § 1345.01, *et seq.*)**

7 2249. Plaintiffs reallege and incorporate by reference all paragraphs as though
8 fully set forth herein.

9 2250. The Ohio Consumer Protection Act, OHIO REV. CODE § 1345.02,
10 prohibits unfair or deceptive acts or practices in connection with a consumer
11 transaction. Specifically, the Act prohibits suppliers from representing that goods
12 have characteristics or uses or benefits which they do not have. The Act also
13 prohibits suppliers from representing that their goods are of a particular quality or
14 grade they are not.
15

16 2251. Defendants are “suppliers” as that term is defined in the Ohio Consumer
17 Protection Act, OHIO REV. CODE § 1345.01(C).
18

19 2252. Plaintiffs are “consumers” as that term is defined in the Ohio Consumer
20 Protection Act, OHIO REV. CODE § 1345.01(D).
21

22 2253. The conduct of Defendants alleged above constitutes unfair and/or
23 deceptive consumer sales practices in violation of OHIO REV. CODE § 1345.02
24 because Defendants represented through advertising and other marketing
25 communications that the vehicles were new and free from defects and could be
26 driven safely in normal operation. Instead, the vehicles were not of the standard,
27 quality or grade of new vehicles.
28

1 2254. Defendants' conduct caused Plaintiffs' damages as alleged.

2 2255. Plaintiff specifically does not allege herein a claim for violation of OHIO
3 REV. CODE § 1345.72.

4 2256. As a result of the foregoing wrongful conduct of Defendants, Plaintiffs
5 have been damaged in an amount to be proven at trial, including, but not limited to,
6 actual and statutory damages, treble damages, court costs and reasonable attorneys'
7 fees, pursuant to OHIO REV. CODE § 1345.09, *et seq.*

9 **COUNT II**

10 **VIOLATION OF OHIO DECEPTIVE TRADE PRACTICES ACT**

11 **(Ohio Rev. Code Ann. § 4165.01, *et seq.***

12 2257. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 2258. OHIO REV. CODE § 4165.02(A) provides that a "person engages in a
15 deceptive trade practice when, in the course of the person's business, vocation, or
16 occupation," the person does any of the following: "(2) Causes likelihood of
17 confusion or misunderstanding as to the source, sponsorship, approval, or
18 certification of goods or services; ... (7) Represents that goods or services have
19 sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that
20 they do not have or that a person has a sponsorship, approval, status, affiliation, or
21 connection that the person does not have; ... (9) Represents that goods or services
22 are of a particular standard, quality, or grade, or that goods are of a particular style or
23 model, if they are of another; ... [and] (11) Advertises goods or services with intent
24 not to sell them as advertised."
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1 2259. Defendants are “persons” within the meaning of OHIO REV. CODE
2 § 4165.01(D).

3 2260. The vehicles sold to Plaintiffs were not of the particular sponsorship,
4 approval, characteristics, ingredients, uses, benefits, or qualities represented by
5 Defendants.

6 2261. The vehicles sold to Plaintiffs were not of the particular standard,
7 quality, and/or grade represented by Defendants.

8 2262. Defendants made false or misleading statements of fact concerning the
9 vehicles Plaintiffs purchased – *i.e.*, that such vehicles were suitable for ordinary use
10 – when Defendants, in fact, knew that they were defective and not suitable for
11 ordinary use.

12 2263. These statements materially influenced Plaintiffs’ decision to purchase
13 the Defective Vehicles, in that Defendants’ statements caused Plaintiffs to purchase
14 vehicles that they otherwise would not have had they known of the dangerous defect.

15 2264. Defendants’ deceptive trade practices caused Plaintiffs’ damages as
16 alleged.

17 2265. Defendants conduct was knowing and/or intentional and/or with malice
18 and/or demonstrated a complete lack of care and/or reckless and/or was in conscious
19 disregard for the rights of Plaintiffs.

20 2266. As a result of the foregoing wrongful conduct of Defendants, Plaintiffs
21 have been damaged in an amount to be proven at trial, including, but not limited to,
22 actual and punitive damages, equitable relief and reasonable attorneys’ fees.

COUNT III

BREACH OF EXPRESS WARRANTY

(Ohio Rev. Code Ann. § 1302.26, *et seq.* (U.C.C. § 2-313))

2267. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2268. Defendants expressly warranted – through statements and advertisements described above – that the vehicles were of high quality, and, at a minimum, would actually work properly and safely.

2269. Defendants breached this warranty by knowingly selling to Plaintiffs vehicles with dangerous defects, and which were not of high quality.

2270. Plaintiffs have been damaged as a direct and proximate result of the breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were and are worth far less than what the Plaintiffs paid to purchase, which was reasonably foreseeable to Defendants.

COUNT IV

**OHIO BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY
STRICT LIABILITY**

(Ohio Rev. Code Ann. § 1302.27 (U.C.C. § 2-314))

2271. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2272. Defendants impliedly warranted that their vehicles were of good and merchantable quality and fit, and safe for their ordinary intended use – transporting the driver and passengers in reasonable safety during normal operation, and without unduly endangering them or members of the public.

1 2273. As described above, there were dangerous defects in the vehicles
2 manufactured, distributed, and/or sold by Defendants, which Plaintiffs purchased,
3 including, but not limited to, defects that caused the vehicles to suddenly and
4 unintentionally accelerate, and the lack of safety systems which would prevent such
5 acceleration or allow a driver to safely slow and stop the vehicle when such
6 acceleration occurred.
7

8 2274. These dangerous defects existed at the time the vehicles left
9 Defendants' manufacturing facilities and at the time they were sold to the Plaintiffs.
10

11 2275. These dangerous defects were the direct and proximate cause of
12 damages to the Plaintiffs.

13 **COUNT V**

14 **OHIO NEGLIGENT DESIGN, ENGINEERING & MANUFACTURE**
15 **(Based On Ohio Law)**

16 2276. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2277. Toyota is a manufacturer and supplier of automobiles.

19 2278. Defendants owed Plaintiffs a non-delegable duty to exercise ordinary
20 and reasonable care to properly design, engineer, and manufacture the vehicles
21 against foreseeable hazards and malfunctions including uncontrollable acceleration.
22

23 2279. Defendants owed Plaintiffs a non-delegable duty to exercise ordinary
24 and reasonable care in designing, engineering and manufacturing the vehicles so that
25 they would function normally, including that they would not accelerate out of
26 control.
27
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1 2280. Defendants also owed – and owe – a continuing duty to notify Plaintiffs
2 of the problem at issue and to repair the dangerous defects.

3 2281. Defendants breached these duties of reasonable care by designing,
4 engineering and manufacturing vehicles that accelerated out of control, and breached
5 their continuing duty to notify Plaintiffs of these defects.
6

7 2282. The foreseeable hazards and malfunctions include, but are not limited
8 to, the sudden and unanticipated and uncontrollable acceleration of these vehicles.

9 2283. Plaintiffs did not and could not know of the intricacies of these defects
10 and their latent and dangerous manifestations, or the likelihood of harm therefrom
11 arising in the normal use of their vehicles.
12

13 2284. At all relevant times, there existed alternative designs and engineering
14 which were both technically and economically feasible. Further, any alleged benefits
15 associated with the defective designs are vastly outweighed by the real risks
16 associated with sudden and uncontrollable acceleration.

17 2285. The vehicles were defective as herein alleged at the time they left
18 Defendants' factories, and the vehicles reached Plaintiffs without substantial change
19 in the condition in which they were sold.
20

21 2286. As a direct and proximate result of Defendants' breaches, Plaintiffs
22 have suffered damages.

23 2287. Accordingly, Plaintiffs are entitled to recover appropriate damages
24 including, but not limited to, diminution of value, return of lease payments and
25 penalties, and injunctive relief related to future lease payments or penalties.
26
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COUNT VI
FRAUD & FRAUDULENT CONCEALMENT
(Based On Ohio Law)

2288. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2289. Toyota intentionally concealed the above-described material safety information, or acted with reckless disregard for the truth, and denied Plaintiffs and the Class information that is highly relevant to their purchasing decision.

2290. Defendants further affirmatively misrepresented to Plaintiffs in advertising and other forms of communication, including standard and uniform material provided with each car, that the vehicles they were selling were new, had no significant defects and would perform and operate properly when driven in normal usage.

2291. The vehicles purchased or leased by Plaintiffs were, in fact, defective, unsafe and unreliable, because the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms.

2292. Toyota had a duty to disclose this material safety information.

2293. The aforementioned concealment was material because if it had been disclosed Plaintiffs would not have bought or leased the vehicles.

2294. The aforementioned representations were material because they were facts that would typically be relied on by a person purchasing or leasing a new motor vehicle. Toyota knew its representations were false because it knew that people had died in its vehicles' unintended acceleration between 2002 and 2009. Toyota intentionally made the false statements in order to sell vehicles.

1 2295. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
2 disclose the acceleration problems and Toyota's affirmative assurance that its
3 vehicles were safe and reliable and other similar false statements – in purchasing or
4 leasing Toyota's vehicles.

5 2296. As a result of their reliance, Plaintiffs have been injured in an amount to
6 be proven at trial, including, but not limited to, their lost benefit of the bargain and
7 overpayment at the time of purchase and/or the diminished value of their vehicles.
8

9 2297. Defendants' conduct was knowing, intentional, with malice,
10 demonstrated a complete lack of care, and was in reckless disregard for the rights of
11 Plaintiffs. Plaintiffs are therefore entitled to an award of punitive damages.
12

13 **COUNT VII**
14 **UNJUST ENRICHMENT**
15 **(Based On Ohio Law)**

16 2298. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2299. Plaintiffs paid Toyota the value of vehicles that are non-defective, and
19 in exchange, Toyota provided Plaintiffs vehicles that are, in fact, defective.
20

21 2300. Further, Plaintiffs paid Toyota the value for vehicles that would not be
22 compromised by substantial, invasive repairs, and in return received vehicles that
23 require such repairs.

24 2301. Further, Plaintiffs paid Toyota for vehicles they could operate, and in
25 exchange, Toyota provided Plaintiffs vehicles that could not be normally operated
26 because their defects posed the possibility of life-threatening injuries or death.
27
28

2302. As such, Plaintiffs conferred a windfall upon Toyota, which knows of the windfall and has retained such benefits, which would be unjust for Toyota to retain.

2303. As a direct and proximate result of Toyota's unjust enrichment, Plaintiffs have suffered and continue to suffer various damages, including, but not limited to, restitution of all amounts by which Defendants were enriched through their misconduct.

OKLAHOMA

COUNT I

VIOLATION OF OKLAHOMA CONSUMER PROTECTION ACT

(Okla. Stat. tit. 15 § 751, *et seq.*)

2304. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2305. The conduct of Toyota as set forth herein constitutes unfair or deceptive acts or practices, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and remedy, and its misrepresentations and omissions regarding the safety and reliability of its vehicles.

2306. Toyota's actions as set forth above occurred in the conduct of trade or commerce.

2307. Toyota's actions impact the public interest because Plaintiffs were injured in exactly the same way as millions of others purchasing and/or leasing Toyota vehicles as a result of Toyota's generalized course of deception. All of the

1 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
2 Toyota's business.

3 2308. Plaintiffs and the Class were injured as a result of Defendant's conduct.
4 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
5 their bargain, and their vehicles have suffered a diminution in value.
6

7 2309. Toyota's conduct proximately caused the injuries to Plaintiffs and the
8 Class.

9 2310. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
10 proven at trial, including attorneys' fees, costs, and treble damages.

11 2311. Pursuant to OKLA. STAT. tit. 15 § 751, Plaintiffs will serve the
12 Oklahoma Attorney General with a copy of this complaint as Plaintiffs seek
13 injunctive relief.
14

15 **COUNT II**

16 **VIOLATION OF OKLAHOMA DECEPTIVE TRADE PRACTICES ACT**
17 **(78 Okla. Stat. Ann. § 51, *et seq.*)**

18 2312. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 2313. The conduct of Toyota as set forth herein constitutes unfair or deceptive
21 acts or practices, including, but not limited to, Toyota's manufacture and sale of
22 vehicles with a sudden acceleration defect that lack brake-override or other effective
23 fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and
24 remedy, and its misrepresentations and omissions regarding the safety and reliability
25 of its vehicles.
26
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1 2314. Toyota's actions as set forth above occurred in the conduct of trade or
2 commerce.

3 2315. Toyota's actions impact the public interest because Plaintiffs were
4 injured in exactly the same way as millions of others purchasing and/or leasing
5 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
6 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
7 Toyota's business.
8

9 2316. Plaintiffs and the Class were injured as a result of Defendant's conduct.
10 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
11 their bargain, and their vehicles have suffered a diminution in value.
12

13 2317. Toyota's conduct proximately caused the injuries to Plaintiffs and the
14 Class.

15 2318. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
16 proven at trial, including attorneys' fees, costs, and treble damages.

17 2319. Pursuant to OKLA. STAT. tit. 78 § 51, Plaintiffs will serve the Oklahoma
18 Attorney General with a copy of this complaint as Plaintiffs seek injunctive relief.
19

20 **COUNT III**
21 **BREACH OF EXPRESS WARRANTY**
22 **(12A Okla. Stat. Ann. § 2-313)**

23 2320. Plaintiffs reallege and incorporate by reference all paragraphs as though
24 fully set forth herein.

25 2321. Toyota is and was at all relevant times a merchant with respect to motor
26 vehicles.
27
28

1 2322. In the course of selling its vehicles, Toyota expressly warranted in
2 writing that the Vehicles were covered by a Basic Warranty.

3 2323. Toyota breached the express warranty to repair and adjust to correct
4 defects in materials and workmanship of any part supplied by Toyota. Toyota has
5 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
6 materials and workmanship defects.

7
8 2324. In addition to this Basic Warranty, Toyota expressly warranted several
9 attributes, characteristics and qualities, as set forth above.

10 2325. These warranties are only a sampling of the numerous warranties that
11 Toyota made relating to safety, reliability and operation, which are more fully
12 outlined in Section IV.A., *supra*. Generally these express warranties promise
13 heightened, superior, and state-of-the-art safety, reliability, performance standards,
14 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
15 advertisements, in Toyota's "e brochures," and in uniform statements provided by
16 Toyota to be made by salespeople. These affirmations and promises were part of the
17 basis of the bargain between the parties.
18

19 2326. These additional warranties were also breached because the Defective
20 Vehicles were not fully operational, safe, or reliable (and remained so even after the
21 problems were acknowledged and a recall "fix" was announced), nor did they
22 comply with the warranties expressly made to purchasers or lessees. Toyota did not
23 provide at the time of sale, and has not provided since then, vehicles conforming to
24 these express warranties.
25

26 2327. Furthermore, the limited warranty of repair and/or adjustments to
27 defective parts, fails in its essential purpose because the contractual remedy is
28

1 insufficient to make the Plaintiffs and the Class whole and because the Defendants
2 have failed and/or have refused to adequately provide the promised remedies within
3 a reasonable time.

4 2328. Accordingly, recovery by the Plaintiffs is not limited to the limited
5 warranty of repair or adjustments to parts defective in materials or workmanship, and
6 Plaintiffs seek all remedies as allowed by law.

7 2329. Also, as alleged in more detail herein, at the time that Defendants
8 warranted and sold the vehicles they knew that the vehicles did not conform to the
9 warranties and were inherently defective, and Defendants wrongfully and
10 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
11 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
12 and/or fraudulent pretenses.

13 2330. Moreover, many of the damages flowing from the Defective Vehicles
14 cannot be resolved through the limited remedy of “replacement or adjustments,” as
15 those incidental and consequential damages have already been suffered due to
16 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
17 continued failure to provide such limited remedy within a reasonable time, and any
18 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
19 Plaintiffs and the Class whole.

20 2331. Finally, due to the Defendants’ breach of warranties as set forth herein,

21 2332. Plaintiffs and the Class assert as an additional and/or alternative
22 remedy, as set forth in 12A OKLA. STAT. ANN. § 2-608, for a revocation of
23 acceptance of the goods, and for a return to Plaintiffs and to the Class of the purchase
24 price of all vehicles currently owned.

2333. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2334. As a direct and proximate result of Toyota's breach of express warranties, Plaintiffs and the Class have been damaged in an amount to be determined at trial.

COUNT IV
BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY
(12A Okla. Stat. Ann. § 2-314)

2335. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2336. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

2337. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions, pursuant to 12A OKLA. STAT. ANN. § 2-314.

2338. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against

1 such SUA events, nor do they have a brake-override; and the ETCS system was not
2 adequately tested.

3 2339. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 2340. Plaintiffs and the Class have had sufficient dealings with either the
10 Defendants or their agents (dealerships) to establish privity of contract between
11 Plaintiffs and the Class. Notwithstanding this, privity is not required in this case
12 because Plaintiffs and the Class are intended third-party beneficiaries of contracts
13 between Toyota and its dealers; specifically, they are the intended beneficiaries of
14 Toyota's implied warranties. The dealers were not intended to be the ultimate
15 consumers of the Defective Vehicles and have no rights under the warranty
16 agreements provided with the Defective Vehicles; the warranty agreements were
17 designed for and intended to benefit the ultimate consumers only. Finally, privity is
18 also not required because Plaintiffs' and Class members' Toyotas are dangerous
19 instrumentalities due to the aforementioned defects and nonconformities.
20
21

22 2341. As a direct and proximate result of Toyota's breach of the warranties of
23 merchantability, Plaintiffs and the Class have been damaged in an amount to be
24 proven at trial.
25
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COUNT V
REVOCATION OF ACCEPTANCE
(12A Okla. Stat. Ann. § 2-608)

2342. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2343. Plaintiffs identified above demanded revocation and the demands were refused.

2344. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

2345. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

2346. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

2347. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

2348. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 2349. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 2350. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 2351. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 2352. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in 12A OKLA. STAT. ANN. § 2-608, for a revocation of acceptance of the goods, and
26 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
27 currently owned.
28

2353. Consequently, Plaintiffs and the Class are entitled to revoke their acceptances, receive all payments made to Toyota, and to all incidental and consequential damages, including the costs associated with purchasing safer vehicles, and all other damages allowable under law, all in amounts to be proven at trial.

COUNT VI
BREACH OF CONTRACT/COMMON LAW WARRANTY
(Based On Oklahoma Law)

2354. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2355. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Oklahoma's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

2356. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

2357. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VII
FRAUD BY CONCEALMENT
(Based On Oklahoma Law)

2358. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2359. As set forth above, Defendants concealed and/or suppressed material facts concerning the safety of their vehicles.

2360. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

2361. In addition, Defendants had a duty to disclose these omitted material facts because they were known and/or accessible only to Defendants who have superior knowledge and access to the facts, and Defendants knew they were not known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts were material because they directly impact the safety of the Defective Vehicles. Whether or not a vehicle accelerates only at the driver's command, and whether a vehicle will stop or not upon application of the brake by the driver, are material safety concerns. Defendants possessed exclusive knowledge of the defects rendering Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

1 2362. Defendants actively concealed and/or suppressed these material facts, in
2 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
3 Defective Vehicles at a higher price for the vehicles, which did not match the
4 vehicles' true value.

5 2363. Defendants still have not made full and adequate disclosure and
6 continue to defraud Plaintiffs and the Class.
7

8 2364. Plaintiffs and the Class were unaware of these omitted material facts
9 and would not have acted as they did if they had known of the concealed and/or
10 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
11 in exclusive control of the material facts and such facts were not known to the public
12 or the Class.
13

14 2365. As a result of the concealment and/or suppression of the facts, Plaintiffs
15 and the Class sustained damage. For those Plaintiffs and the Class who elect to
16 affirm the sale, these damages, include the difference between the actual value of
17 that which Plaintiffs and the Class paid and the actual value of that which they
18 received, together with additional damages arising from the sales transaction,
19 amounts expended in reliance upon the fraud, compensation for loss of use and
20 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
21 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
22 restitution and consequential damages.
23

24 2366. Defendants' acts were done maliciously, oppressively, deliberately, with
25 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
26 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
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1 punitive damages in an amount sufficient to deter such conduct in the future, which
2 amount is to be determined according to proof.

3 **COUNT VIII**
4 **UNJUST ENRICHMENT**
5 **(Based On Oklahoma Law)**

6 2367. Plaintiffs reallege and incorporate by reference all paragraphs as though
7 fully set forth herein.

8 2368. Toyota had knowledge of the safety defects in its vehicles, which it
9 failed to disclose to Plaintiffs and the Class.

10 2369. As a result of their wrongful and fraudulent acts and omissions, as set
11 forth above, pertaining to the design defect of their vehicles and the concealment of
12 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
13 value and Toyota obtained monies which rightfully belong to Plaintiffs.

14 2370. Toyota appreciated, accepted and retained the non-gratuitous benefits
15 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
16 paid a higher price for vehicles which actually had lower values. It would be
17 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

18 2371. Plaintiffs, therefore, are entitled to restitution and seek an order
19 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
20 interest.
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OREGON

COUNT I

VIOLATION OF THE OREGON UNLAWFUL TRADE PRACTICES ACT

(Or. Rev. Stat. §§ 646.605, *et seq.*)

2372. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2373. The Oregon Unfair Trade Practices Act (“OUTPA”) prohibits a person from, in the course of the person’s business, doing any of the following:

“(e) Represent[ing] that ... goods ... have ... characteristics ... uses, benefits, ... or qualities that they do not have; (g) Represent[ing] that ... goods ... are of a particular standard [or] quality ... if they are of another; and (i) Advertis[ing] ... goods or services with intent not to provide them as advertised.” OR. REV. STAT.

§ 646.608(1).

2374. Toyota is a person within the meaning of OR. REV. STAT. § 646.605(4).

2375. The Defective Vehicles at issue are “goods” obtained primarily for personal family or household purposes within the meaning of OR. REV. STAT.

§ 646.605(6).

2376. In the course of Toyota’s business, it willfully failed to disclose and actively concealed the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as described above. Accordingly, Toyota engaged in unlawful trade practices, including representing that Defective Vehicles have characteristics, uses, benefits, and qualities which they do not have; representing that Defective Vehicles are of a particular standard and quality when they are not; and advertising Defective Vehicles

1 with the intent not to sell them as advertised. Toyota knew or should have known
2 that its conduct violated the OUTPA.

3 2377. As a result of these unlawful trade practices, Plaintiffs have suffered
4 ascertainable loss.

5 2378. Toyota engaged in a deceptive trade practice when it failed to disclose
6 material information concerning the Toyota vehicles which was known to Toyota at
7 the time of the sale. Toyota deliberately withheld the information about the vehicles'
8 propensity for rapid, uncontrolled acceleration in order to ensure that consumers
9 would purchase its vehicles and to induce the consumer to enter into a transaction.
10

11 2379. The propensity of the Toyotas for rapid, uncontrolled acceleration and
12 their lack of a fail-safe mechanism were material to Plaintiffs and the Class. Had
13 Plaintiffs and the Class known that their Toyotas had these serious safety defects,
14 they would not have purchased their Toyotas.
15

16 2380. Plaintiffs and the Class suffered ascertainable loss caused by Toyota's
17 failure to disclose material information. Plaintiffs and the Class overpaid for their
18 vehicles and did not receive the benefit of their bargain. The value of their Toyota's
19 has diminished now that the safety issues have come to light, and Plaintiffs and the
20 Class own vehicles that are not safe.
21

22 2381. Plaintiffs are entitled to recover the greater of actual damages or \$200
23 pursuant to OR. REV. STAT. § 646.638(1). Plaintiffs are also entitled to punitive
24 damages because Toyota engaged in conduct amounting to a particularly aggravated,
25 deliberate disregard of the rights of others.
26

27 2382. Pursuant to OR. REV. STAT. § 646.638(2), Plaintiffs will mail a copy of
28 the complaint to Oregon's attorney general.

COUNT II

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Or. Rev. Stat. § 72.3140)

2383. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2384. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

2385. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

2386. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2387. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2388. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT III
REVOCATION OF ACCEPTANCE
(Or. Rev. Stat. § 72.6080)

2389. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2390. Plaintiffs identified above demanded revocation and the demands were refused.

2391. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have discovered them when they purchased or leased their automobiles from Toyota. On the other hand, Toyota was aware of the defects and nonconformities at the time of sale and thereafter.

2392. Acceptance was reasonably induced by the difficulty of discovery of the defects and nonconformities before acceptance.

2393. There has been no change in the condition of Plaintiffs' vehicles not caused by the defects and nonconformities.

2394. When Plaintiffs sought to revoke acceptance, Toyota refused to accept return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies paid.

2395. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them.

1 2396. These defects and nonconformities substantially impaired the value of
2 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
3 basic sources. First, the Defective Vehicles fail in their essential purpose because
4 they present an unreasonably high risk of sudden unintended acceleration (a risk
5 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
6 Second, the repair and adjust warranty has failed of its essential purpose because
7 Toyota cannot repair or adjust the Defective Vehicles.
8

9 2397. Plaintiffs and the Class provided notice of their intent to seek revocation
10 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
11 (and many Class members) have requested that Toyota accept return of their vehicles
12 and return all payments made. Plaintiffs on behalf of themselves and the Class
13 hereby demand revocation and tender their Defective Vehicles.
14

15 2398. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them, as they must continue using them due to the
20 financial burden of securing alternative means of transport for an uncertain and
21 substantial period of time.
22

23 2399. Finally, due to the Defendants' breach of warranties as set forth herein,
24 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
25 in OR. REV. STAT. § 72.6080, for a revocation of acceptance of the goods, and for a
26 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
27 owned.
28

1 vehicle will stop or not upon application of the brake by the driver, are material
2 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
3 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

4 2405. Defendants actively concealed and/or suppressed these material facts, in
5 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
6 Defective Vehicles at a higher price for the vehicles, which did not match the
7 vehicles' true value.
8

9 2406. Defendants still have not made full and adequate disclosure and
10 continue to defraud Plaintiffs and the Class.

11 2407. Plaintiffs and the Class were unaware of these omitted material facts
12 and would not have acted as they did if they had known of the concealed and/or
13 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
14 in exclusive control of the material facts and such facts were not known to the public
15 or the Class.
16

17 2408. As a result of the concealment and/or suppression of the facts, Plaintiffs
18 and the Class sustained damage. For those Plaintiffs and the Class who elect to
19 affirm the sale, these damages, include the difference between the actual value of
20 that which Plaintiffs and the Class paid and the actual value of that which they
21 received, together with additional damages arising from the sales transaction,
22 amounts expended in reliance upon the fraud, compensation for loss of use and
23 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
24 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
25 restitution and consequential damages.
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1 2409. Defendants' acts were done maliciously, oppressively, deliberately, with
2 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
3 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
4 punitive damages in an amount sufficient to deter such conduct in the future, which
5 amount is to be determined according to proof.
6

7 **COUNT V**
8 **UNJUST ENRICHMENT**
9 **(Based On Oregon Law)**

10 2410. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2411. Toyota had knowledge of the safety defects in its vehicles, which it
13 failed to disclose to Plaintiffs and the Class.

14 2412. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
17 value and Toyota obtained monies which rightfully belong to Plaintiffs.
18

19 2413. Toyota appreciated, accepted and retained the non-gratuitous benefits
20 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
21 paid a higher price for vehicles which actually had lower values. It would be
22 inequitable and unjust for Toyota to retain these wrongfully obtained profits.
23

24 2414. Plaintiffs, therefore, are entitled to restitution and seek an order
25 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
26 interest.
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PENNSYLVANIA

COUNT I

**VIOLATION OF THE PENNSYLVANIA UNFAIR TRADE PRACTICES
AND CONSUMER PROTECTION LAW**

(73 P.S. § 201-1, *et seq.*)

2415. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2416. The conduct of Toyota as set forth herein constitutes unfair or deceptive acts or practices, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and remedy, and its misrepresentations and omissions regarding the safety and reliability of its vehicles.

2417. Toyota's actions as set forth above occurred in the conduct of trade or commerce.

2418. Toyota's actions impact the public interest because Plaintiffs were injured in exactly the same way as millions of others purchasing and/or leasing Toyota vehicles as a result of Toyota's generalized course of deception. All of the wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Toyota's business.

2419. Plaintiffs and the Class suffered ascertainable loss as a result of Defendant's conduct. Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of their bargain, and their vehicles have suffered a diminution in value.

1 2420. Toyota's conduct proximately caused the injuries to Plaintiffs and the
2 Class.

3 2421. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
4 proven at trial, including attorneys' fees, costs, and treble damages.
5

6 **COUNT II**
7 **BREACH OF EXPRESS WARRANTY**
8 **(13 Pa. Cons. Stat. Ann. § 2313)**

9 2422. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 2423. Toyota is and was at all relevant times a seller with respect to motor
12 vehicles.

13 2424. In the course of selling its vehicles, Toyota expressly warranted in
14 writing that the Vehicles were covered by a Basic Warranty.
15

16 2425. Toyota breached the express warranty to repair and adjust to correct
17 defects in materials and workmanship of any part supplied by Toyota. Toyota has
18 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
19 materials and workmanship defects.

20 2426. In addition to this Basic Warranty, Toyota expressly warranted several
21 attributes, characteristics and qualities, as set forth above.
22

23 2427. These warranties are only a sampling of the numerous warranties that
24 Toyota made relating to safety, reliability and operation, which are more fully
25 outlined in Section IV.A., of the MCC. Generally these express warranties promise
26 heightened, superior, and state-of-the-art safety, reliability, performance standards,
27 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
28

1 advertisements, in Toyota's "e brochures," and in uniform statements provided by
2 Toyota to be made by salespeople. These affirmations and promises were part of the
3 basis of the bargain between the parties.

4 2428. These additional warranties were also breached because the Defective
5 Vehicles were not fully operational, safe, or reliable (and remained so even after the
6 problems were acknowledged and a recall "fix" was announced), nor did they
7 comply with the warranties expressly made to purchasers or lessees. Toyota did not
8 provide at the time of sale, and has not provided since then, vehicles conforming to
9 these express warranties.
10

11 2429. Furthermore, the limited warranty of repair and/or adjustments to
12 defective parts, fails in its essential purpose because the contractual remedy is
13 insufficient to make the Plaintiffs and the Class whole and because the Defendants
14 have failed and/or have refused to adequately provide the promised remedies within
15 a reasonable time.
16

17 2430. Accordingly, recovery by the Plaintiffs is not limited to the limited
18 warranty of repair or adjustments to parts defective in materials or workmanship, and
19 Plaintiffs seek all remedies as allowed by law.
20

21 2431. Also, as alleged in more detail herein, at the time that Defendants
22 warranted and sold the vehicles they knew that the vehicles did not conform to the
23 warranties and were inherently defective, and Defendants wrongfully and
24 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
25 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
26 and/or fraudulent pretenses.
27
28

1 2432. Moreover, many of the damages flowing from the Defective Vehicles
2 cannot be resolved through the limited remedy of “replacement or adjustments,” as
3 those incidental and consequential damages have already been suffered due to
4 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
5 continued failure to provide such limited remedy within a reasonable time, and any
6 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
7 Plaintiffs and the Class whole.
8

9 2433. Finally, due to the Defendants’ breach of warranties as set forth herein,
10 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
11 in 13 PA. CONS. STAT. § 2608, for a revocation of acceptance of the goods, and for a
12 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
13 owned.
14

15 2434. Toyota was provided notice of these issues by numerous complaints
16 filed against it, including the instant complaint, and by numerous individual letters
17 and communications sent by Plaintiffs and the Class before or within a reasonable
18 amount of time after Toyota issued the recall and the allegations of vehicle defects
19 became public.
20

21 2435. As a direct and proximate result of Toyota’s breach of express
22 warranties, Plaintiffs and the Class have been damaged in an amount to be
23 determined at trial.
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COUNT III

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(13 Pa. Cons. Stat. Ann. § 2314)

2436. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2437. Toyota is and was at all relevant times a merchant with respect to motor vehicles.

2438. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

2439. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2440. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2441. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT IV

UNJUST ENRICHMENT

(Based On Pennsylvania Law)

2442. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2443. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

2444. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

2445. Toyota appreciated, accepted and retained the non-gratuitous benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits.

2446. Plaintiffs, therefore, are entitled to restitution and seek an order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

COUNT V

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On Pennsylvania Law)

2447. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 2448. To the extent Toyota's repair or adjust commitment is deemed not to be
2 a warranty under Pennsylvania's Commercial Code, Plaintiffs plead in the alternative
3 under common law warranty and contract law. Toyota limited the remedies
4 available to Plaintiffs and the Class to just repairs and adjustments needed to correct
5 defects in materials or workmanship of any part supplied by Toyota, and/or
6 warranted the quality or nature of those services to Plaintiffs.
7

8 2449. Toyota breached this warranty or contract obligation by failing to repair
9 the Defective Vehicles evidencing a sudden unintended acceleration problem,
10 including those that were recalled, or to replace them.
11

12 2450. As a direct and proximate result of Defendants' breach of contract or
13 common law warranty, Plaintiffs and the Class have been damaged in an amount to
14 be proven at trial, which shall include, but is not limited to, all compensatory
15 damages, incidental and consequential damages, and other damages allowed by law.
16

17 **RHODE ISLAND**

18 **COUNT I**

19 **VIOLATION OF THE RHODE ISLAND UNFAIR TRADE PRACTICES
20 AND CONSUMER PROTECTION ACT**

21 **(R.I. Gen. Laws § 6-13.1, *et seq.*)**

22 2451. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 2452. Plaintiffs are persons who purchase or lease goods primarily for
25 personal, family, or household purposes within the meaning of R.I. GEN. LAWS § 6-
26 13.1-5.2(a).

27 2453. Rhode Island's Unfair Trade Practices and Consumer Protection Act
28 ("UTPCPA") prohibits "unfair or deceptive acts or practices in the conduct of any

1 trade or commerce” including: “(v) Representing that goods or services have
2 sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that
3 they do not have”; “(vii) Representing that goods or services are of a particular
4 standard, quality, or grade ..., if they are of another”; “(ix) Advertising goods or
5 services with intent not to sell them as advertised”; “(xii) Engaging in any other
6 conduct that similarly creates a likelihood of confusion or of misunderstanding”;
7 “(xiii) Engaging in any act or practice that is unfair or deceptive to the consumer”;
8 and “(xiv) Using any other methods, acts or practices which mislead or deceive
9 members of the public in a material respect.” R.I. GEN. LAWS § 6-13.1-1(6).
10

11 2454. In the course of Toyota’s business, it willfully failed to disclose and
12 actively concealed the dangerous risk of throttle control failure and the lack of
13 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
14 described above. Accordingly, Toyota engaged in unlawful trade practices,
15 including representing that Defective Vehicles have characteristics, uses, benefits,
16 and qualities which they do not have; representing that Defective Vehicles are of a
17 particular standard and quality when they are not; advertising Defective Vehicles
18 with the intent not to sell them as advertised; and otherwise engaging in conduct
19 likely to deceive.
20
21

22 2455. Toyota’s actions as set forth above occurred in the conduct of trade or
23 commerce.
24

25 2456. Plaintiffs suffered ascertainable loss of money as a result of Toyota’s
26 violation of the UTPCPA.
27

28 2457. Plaintiffs and the Class were injured as a result of Toyota’s conduct in
that Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of

1 their bargain, and their vehicles have suffered a diminution in value. These injuries
2 are the direct and natural consequence of Toyota's misrepresentations and omissions.

3 2458. Accordingly, Plaintiffs are entitled to recover the greater of actual
4 damages or \$200 pursuant to R.I. GEN. LAWS § 6-13.1-5.2(a).

5
6 **COUNT II**
7 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
8 **(R.I. Gen. Laws § 6A-2-314)**

9 2459. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 2460. Toyota is and was at all relevant times a merchant with respect to motor
12 vehicles.

13 2461. A warranty that the Defective Vehicles were in merchantable condition
14 is implied by law in the instant transactions.

15
16 2462. These vehicles, when sold and at all times thereafter, were not in
17 merchantable condition and are not fit for the ordinary purpose for which cars are
18 used. Specifically, the Defective Vehicles are inherently defective in that there are
19 defects in the vehicle control systems that permit sudden unintended acceleration to
20 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
21 such SUA events, nor do they have a brake-override; and the ETCS system was not
22 adequately tested.

23
24 2463. Toyota was provided notice of these issues by numerous complaints
25 filed against it, including the instant complaint, and by numerous individual letters
26 and communications sent by Plaintiffs and the Class before or within a reasonable
27
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1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 2464. As a direct and proximate result of Toyota's breach of the warranties of
4 merchantability, Plaintiffs and the Class have been damaged in an amount to be
5 proven at trial.
6

7 **COUNT III**
8 **REVOCATION OF ACCEPTANCE**
9 **(R.I. Gen. Laws § 6A-2-608)**

10 2465. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2466. Plaintiffs identified above demanded revocation and the demands were
13 refused.
14

15 2467. Plaintiffs and the Class had no knowledge of such defects and
16 nonconformities, were unaware of these defects, and reasonably could not have
17 discovered them when they purchased or leased their automobiles from Toyota. On
18 the other hand, Toyota was aware of the defects and nonconformities at the time of
19 sale and thereafter.

20 2468. Acceptance was reasonably induced by the difficulty of discovery of the
21 defects and nonconformities before acceptance.
22

23 2469. There has been no change in the condition of Plaintiffs' vehicles not
24 caused by the defects and nonconformities.

25 2470. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
26 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
27 paid.
28

1 2471. Plaintiffs and the Class would suffer economic hardship if they returned
2 their vehicles but did not receive the return of all payments made by them. Because
3 Toyota is refusing to acknowledge any revocation of acceptance and return
4 immediately any payments made, Plaintiffs and the Class have not re-accepted their
5 Defective Vehicles by retaining them.
6

7 2472. These defects and nonconformities substantially impaired the value of
8 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
9 basic sources. First, the Defective Vehicles fail in their essential purpose because
10 they present an unreasonably high risk of sudden unintended acceleration (a risk
11 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
12 Second, the repair and adjust warranty has failed of its essential purpose because
13 Toyota cannot repair or adjust the Defective Vehicles.
14

15 2473. Plaintiffs and the Class provided notice of their intent to seek revocation
16 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
17 (and many Class members) have requested that Toyota accept return of their vehicles
18 and return all payments made. Plaintiffs on behalf of themselves and the Class
19 hereby demand revocation and tender their Defective Vehicles.
20

21 2474. Plaintiffs and the Class would suffer economic hardship if they returned
22 their vehicles but did not receive the return of all payments made by them. Because
23 Toyota is refusing to acknowledge any revocation of acceptance and return
24 immediately any payments made, Plaintiffs and the Class have not re-accepted their
25 Defective Vehicles by retaining them, as they must continue using them due to the
26 financial burden of securing alternative means of transport for an uncertain and
27 substantial period of time.
28

2475. Finally, due to the Defendants' breach of warranties as set forth herein, Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth in R.I. GEN. LAWS § 6A-2-608, for a revocation of acceptance of the goods, and for a return to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.

2476. Consequently, Plaintiffs and the Class are entitled to revoke their acceptances, receive all payments made to Toyota, and to all incidental and consequential damages, including the costs associated with purchasing safer vehicles, and all other damages allowable under law, all in amounts to be proven at trial.

COUNT IV
UNJUST ENRICHMENT
(Based On Rhode Island Law)

2477. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2478. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

2479. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota obtained monies which rightfully belong to Plaintiffs.

2480. Toyota appreciated, accepted and retained the benefits conferred by Plaintiffs and the Class, who without knowledge of the safety defects paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Toyota to retain these wrongfully obtained profits.

SOUTH CAROLINA

2482. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 2487. As a direct and proximate result of Toyota's breach of the warranties of
4 merchantability, Plaintiffs and the Class have been damaged in an amount to be
5 proven at trial.
6

7 **COUNT II**
8 **UNJUST ENRICHMENT**
9 **(Based On South Carolina Law)**

10 2488. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2489. As a result of their wrongful and fraudulent acts and omissions, as set
13 forth above, pertaining to the design defect of their vehicles and the concealment of
14 the defect, Defendants charged a higher price for their vehicles than the vehicles'
15 true value and Defendants obtained monies which rightfully belong to Plaintiffs.
16

17 2490. Defendants knowingly enjoyed the benefit of increased financial gains,
18 to the detriment of Plaintiffs and the Class, who paid a higher price for vehicles
19 which actually had lower values. It would be inequitable and unjust for Defendants
20 to retain these wrongfully obtained profits.
21

22 2491. Plaintiffs, therefore, are entitled to restitution and seek an order
23 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
24 interest.
25
26
27
28

COUNT III
VIOLATIONS OF THE SOUTH CAROLINA
UNFAIR TRADE PRACTICES ACT
(S.C. Code Ann. § 39-5-10, et seq.)

2492. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2493. Defendants are “persons” under S.C. CODE ANN. § 39-5-10.

2494. Defendants both participated in unfair or deceptive acts or practices that violated the South Carolina Unfair Trade Practices Act (the “Act”), S.C. CODE ANN. § 39-5-10, *et seq.*, as described above and below. Defendants each are directly liable for these violations of law. TMC also is liable for TMS’s violations of the Act because TMS acts as TMC’s general agent in the United States for purposes of sales and marketing.

2495. By failing to disclose and actively concealing the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS, Defendants engaged in unfair or deceptive practices prohibited by the Act, S.C. CODE ANN. § 39-5-10, *et seq.*, including (1) representing that Defective Vehicles have characteristics, uses, benefits, and qualities which they do not have, (2) representing that Defective Vehicles are of a particular standard, quality, and grade when they are not, (3) advertising Defective Vehicles with the intent not to sell them as advertised, (4) representing that a transaction involving Defective Vehicles confers or involves rights, remedies, and obligations which it does not, and (5) representing that the subject of a transaction involving Defective

1 Vehicles has been supplied in accordance with a previous representation when it has
2 not.

3 2496. As alleged above, Defendants made numerous material statements about
4 the safety and reliability of Defective Vehicles that were either false or misleading.
5 Each of these statements contributed to the deceptive context of TMC's and TMS's
6 unlawful advertising and representations as a whole.
7

8 2497. Defendants knew that the ETCS in Defective Vehicles was defectively
9 designed or manufactured, would fail without warning, and was not suitable for its
10 intended use of regulating throttle position and vehicle speed based on driver
11 commands. Defendants nevertheless failed to warn Plaintiffs about these inherent
12 dangers despite having a duty to do so.
13

14 2498. Defendants each owed Plaintiffs a duty to disclose the defective nature
15 of Defective Vehicles, including the dangerous risk of throttle control failure, the
16 ETCS defects, and the lack of adequate fail-safe mechanisms, because they:

17 2499. Possessed exclusive knowledge of the defects rendering Defective
18 Vehicles inherently more dangerous and unreliable than similar vehicles;
19

20 2500. Intentionally concealed the hazardous situation with Defective Vehicles
21 through their deceptive marketing campaign and recall program that they designed to
22 hide the life-threatening problems from Plaintiffs; and/or

23 2501. Made incomplete representations about the safety and reliability of
24 Defective Vehicles generally, and ETCS in particular, while purposefully
25 withholding material facts from Plaintiffs that contradicted these representations.
26

27 2502. Defective Vehicles equipped with ETCS pose an unreasonable risk of
28 death or serious bodily injury to Plaintiffs, passengers, other motorists, pedestrians,

1 and the public at large, because they are susceptible to incidents of sudden
2 unintended acceleration.

3 2503. Whether or not a vehicle (a) accelerates only when commanded to do so
4 and (b) decelerates and stops when commanded to do so are facts that a reasonable
5 consumer would consider important in selecting a vehicle to purchase or lease.
6 When Plaintiffs bought a Toyota Vehicle for personal, family, or household
7 purposes, they reasonably expected the vehicle would (a) not accelerate unless
8 commanded to do so by application of the accelerator pedal or other driver controlled
9 means; (b) decelerate to a stop when the brake pedal was applied, and was equipped
10 with any necessary fail-safe mechanisms including a brake-override.
11

12 2504. TMC's and TMS's unfair or deceptive trade practices were likely to and
13 did in fact deceive reasonable consumers, including Plaintiffs, about the true safety
14 and reliability of Defective Vehicles.
15

16 2505. As a result of its violations of the Act detailed above, Defendants
17 caused actual damage to Plaintiffs and, if not stopped, will continue to harm
18 Plaintiffs. Plaintiffs currently own or lease, or within the class period have owned or
19 leased, Defective Vehicles that are defective and inherently unsafe. ETCS defects
20 and the resulting unintended acceleration incidents have caused the value of
21 Defective Vehicles to plummet.
22

23 2506. Plaintiffs risk irreparable injury as a result of TMC's and TMS's acts
24 and omissions in violation of the Act, and these violations present a continuing risk
25 to Plaintiffs as well as to the general public.
26

27 2507. Pursuant to S.C. CODE ANN. § 39-5-140, Plaintiffs seek monetary relief
28 against TMS and TMC to recover for their sustained losses.

1 2508. Plaintiffs further allege that Defendants' malicious and deliberate
2 conduct warrants an assessment of punitive damages because Defendants each
3 carried out despicable conduct with willful and conscious disregard of the rights and
4 safety of others, subjecting Plaintiffs to cruel and unjust hardship as a result.
5 Defendants intentionally and willfully misrepresented the safety and reliability of
6 Defective Vehicles, deceived Plaintiffs on life-or-death matters, and concealed
7 material facts that only they knew, all to avoid the expense and public relations
8 nightmare of correcting a deadly flaw in the Defective Vehicles they repeatedly
9 promised Plaintiffs were safe. Defendants' unlawful conduct constitutes malice,
10 oppression, and fraud warranting punitive damages.
11

12 2509. The recalls and repairs instituted by Toyota have not been adequate.
13 Defective Vehicles still are defective and the "confidence" booster offer of an
14 override is not an effective remedy and is not offered to all Defective Vehicles,
15 including the 2002-2007 Camry.
16

17 2510. Plaintiffs further seek an order enjoining Defendants' unfair or
18 deceptive acts or practices, restitution, punitive damages, costs of Court, attorney's
19 fees, and any other just and proper relief available under the Act.
20

21 **COUNT IV**

22 **VIOLATIONS OF THE SOUTH CAROLINA REGULATION OF**
23 **MANUFACTURERS, DISTRIBUTORS, AND DEALERS ACT**

24 **(S.C. Code Ann. § 56-15-10, *et seq.*)**

25 2511. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.
27
28

1 2512. Defendants are “manufacturers” as set forth in S.C. CODE ANN. § 56-15-
2 10, as they are engaged in the business of manufacturing or assembling new and
3 unused motor vehicles.

4 2513. Defendants both participated in unfair or deceptive acts or practices that
5 violated the South Carolina Regulation of Manufacturers, Distributors, and Dealers
6 Act (“Dealers Act”), S.C. CODE ANN. § 56-15-30. Defendants each are directly
7 liable for these violations of law. TMC also is liable for TMS’s violations of the
8 Dealers Act because TMS acts as TMC’s general agent in the United States for
9 purposes of sales and marketing.
10

11 2514. Defendants have engaged in actions which were arbitrary, in bad faith,
12 unconscionable, and which caused damage to Plaintiffs, the Class, and to the public.
13 Defendants have directly participated in the wrongful conduct.
14

15 2515. Defendants’ bad faith and unconscionable actions include, but are not
16 limited to: (1) representing that Defective Vehicles have characteristics, uses,
17 benefits, and qualities which they do not have, (2) representing that Defective
18 Vehicles are of a particular standard, quality, and grade when they are not,
19 (3) advertising Defective Vehicles with the intent not to sell them as advertised,
20 (4) representing that a transaction involving Defective Vehicles confers or involves
21 rights, remedies, and obligations which it does not, and (5) representing that the
22 subject of a transaction involving Defective Vehicles has been supplied in
23 accordance with a previous representation when it has not.
24

25 2516. Defendants have resorted to and used false and misleading
26 advertisement in connection with their business. As alleged above, Defendants made
27 numerous material statements about the safety and reliability of Defective Vehicles
28

1 that were either false or misleading. Each of these statements contributed to the
2 deceptive context of TMC's and TMS's unlawful advertising and representations as
3 a whole.

4 2517. Pursuant to S.C. CODE ANN. § 56-15-110(2), Plaintiffs bring this action
5 on behalf of themselves and the Class, as the action is one of common or general
6 interest to many persons and the parties are too numerous to bring them all before the
7 court.
8

9 2518. Plaintiffs and the Class are entitled to double the actual damages, the
10 cost of the suit, attorney's fees pursuant to S.C. CODE ANN. § 56-15-110, and
11 Plaintiffs also seek injunctive relief under S.C. CODE ANN. § 56-15-110. Plaintiffs
12 also seek treble damages because Defendants have acted maliciously.
13

14 **COUNT V**

15 **BREACH OF CONTRACT/COMMON LAW WARRANTY**

16 **(Based On South Carolina Law)**

17 2519. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 2520. To the extent Toyota's repair or adjust commitment is deemed not to be
20 a warranty under South Carolina's Commercial Code, Plaintiffs plead in the
21 alternative under common law warranty and contract law. Toyota limited the
22 remedies available to Plaintiffs and the Class to just repairs and adjustments needed
23 to correct defects in materials or workmanship of any part supplied by Toyota,
24 and/or warranted the quality or nature of those services to Plaintiffs.
25
26
27
28

2522. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

2523. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2525. Under S.D. CODIFIED LAWS § 57A-2-318, Plaintiffs have the same standing as any direct purchaser of a vehicle from Toyota.

2527. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the Vehicles' materials and workmanship defects.

1 2528. In addition to this Basic Warranty, Toyota expressly warranted several
2 attributes, characteristics and qualities, as set forth above.

3 2529. These warranties are only a sampling of the numerous warranties that
4 Toyota made relating to safety, reliability and operation, which are more fully
5 outlined in Section IV.A., *supra*. Generally these express warranties promise
6 heightened, superior, and state-of-the-art safety, reliability, performance standards,
7 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
8 advertisements, in Toyota's "e brochures," and in uniform statements provided by
9 Toyota to be made by salespeople. These affirmations and promises were part of the
10 basis of the bargain between the parties.
11

12 2530. These additional warranties were also breached because the Defective
13 Vehicles were not fully operational, safe, or reliable (and remained so even after the
14 problems were acknowledged and a recall "fix" was announced), nor did they
15 comply with the warranties expressly made to purchasers or lessees. Toyota did not
16 provide at the time of sale, and has not provided since then, vehicles conforming to
17 these express warranties.
18

19 2531. Furthermore, the limited warranty of repair and/or adjustments to
20 defective parts, fails in its essential purpose because the contractual remedy is
21 insufficient to make the Plaintiffs and the Class whole and because the Defendants
22 have failed and/or have refused to adequately provide the promised remedies within
23 a reasonable time.
24

25 2532. Accordingly, recovery by the Plaintiffs is not limited to the limited
26 warranty of repair or adjustments to parts defective in materials or workmanship, and
27 Plaintiffs seek all remedies as allowed by law.
28

1 2533. Also, as alleged in more detail herein, at the time that Defendants
2 warranted and sold the vehicles they knew that the vehicles did not conform to the
3 warranties and were inherently defective, and Defendants wrongfully and
4 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
5 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
6 and/or fraudulent pretenses.
7

8 2534. Moreover, many of the damages flowing from the Defective Vehicles
9 cannot be resolved through the limited remedy of “replacement or adjustments,” as
10 those incidental and consequential damages have already been suffered due to
11 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
12 continued failure to provide such limited remedy within a reasonable time, and any
13 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
14 Plaintiffs and the Class whole.
15

16 2535. Finally, due to the Defendants’ breach of warranties as set forth herein,
17 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
18 in S.D. CODIFIED LAWS § 57A-2-608, for a revocation of acceptance of the goods,
19 and for a return to Plaintiffs and to the Class of the purchase price of all vehicles
20 currently owned.
21

22 2536. Toyota was provided notice of these issues by numerous complaints
23 filed against it, including the instant complaint, and by numerous individual letters
24 and communications sent by Plaintiffs and the Class before or within a reasonable
25 amount of time after Toyota issued the recall and the allegations of vehicle defects
26 became public.
27
28

1 2537. As a direct and proximate result of Toyota's breach of express
2 warranties, Plaintiffs and the Class have been damaged in an amount to be
3 determined at trial.

4
5 **COUNT II**
6 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
7 **(S.D. Codified Laws § 57A-2-314)**

8 2538. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 2539. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles.

12 2540. A warranty that the Defective Vehicles were merchantable is implied by
13 law in the instant transactions.

14 2541. Under S.D. CODIFIED LAWS § 57A-2-318, Plaintiffs have the same
15 standing as any direct purchaser of a vehicle from Toyota.

16
17 2542. These vehicles, when sold and at all times thereafter, were not
18 merchantable and are not fit for the ordinary purpose for which cars are used.
19 Specifically, the Defective Vehicles are inherently defective in that there are defects
20 in the vehicle control systems that permit sudden unintended acceleration to occur;
21 the Defective Vehicles do not have an adequate fail-safe to protect against such SUA
22 events, nor do they have a brake-override; and the ETCS system was not adequately
23 tested.
24

25 2543. As a direct and proximate result of Toyota's breach of the warranties of
26 merchantability, Plaintiffs and the Class have been damaged in an amount to be
27 proven at trial.
28

COUNT III
UNJUST ENRICHMENT
(Based On South Dakota Law)

2544. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2545. Toyota had knowledge of the safety defects in its vehicles, which it failed to disclose to Plaintiffs and the Class.

2546. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota received such higher price as a benefit.

2547. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota charged a higher price for their vehicles than the vehicles' true value and Toyota knew that it had received such higher price as benefit.

2548. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Toyota was able to charge a higher price for their vehicles than the vehicles' true value, and the benefit it received as a result unjustly enriches Toyota unless and until such benefit is reimbursed to Plaintiff.

2549. No justification exists for Toyota to keep such benefit without reimbursing it to Plaintiffs.

COUNT IV

**VIOLATION OF THE SOUTH DAKOTA
DECEPTIVE TRADE PRACTICES ACT**

(S.D. Codified Laws § 37-24-6)

2550. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2551. The conduct of Toyota as set forth herein constitutes deceptive acts or practices, fraud, and misrepresentation, including, but not limited to, Toyota's manufacture and sale of vehicles with a sudden acceleration defect that lack brake-override or other effective fail-safe mechanisms which Toyota failed to adequately investigate, disclose and remedy, and Toyota's misrepresentations and omissions regarding the safety and reliability of its vehicles.

2552. Plaintiffs and the Class were injured as a result of Defendant's conduct. Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of their bargain, and their vehicles have suffered a diminution in value.

2553. Toyota's conduct proximately caused the injuries to Plaintiffs and the Class.

2554. Under S.D. CODIFIED LAWS § 37-24-31, Plaintiffs and the Class are entitled to a recovery of their actual damages suffered as a result of Toyota's acts and practices.

COUNT V

REVOCATION OF ACCEPTANCE

(S.D. Codified Laws § 57A-2-608)

2555. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 2556. Plaintiffs identified above demanded revocation and the demands were
2 refused.

3 2557. Plaintiffs and the Class had no knowledge of such defects and
4 nonconformities, were unaware of these defects, and reasonably could not have
5 discovered them when they purchased or leased their automobiles from Toyota. On
6 the other hand, Toyota was aware of the defects and nonconformities at the time of
7 sale and thereafter.

8
9 2558. Acceptance was reasonably induced by the difficulty of discovery of the
10 defects and nonconformities before acceptance.

11 2559. There has been no change in the condition of Plaintiffs' vehicles not
12 caused by the defects and nonconformities.

13
14 2560. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
15 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
16 paid.

17 2561. Plaintiffs and the Class would suffer economic hardship if they returned
18 their vehicles but did not receive the return of all payments made by them. Because
19 Toyota is refusing to acknowledge any revocation of acceptance and return
20 immediately any payments made, Plaintiffs and the Class have not re-accepted their
21 Defective Vehicles by retaining them.

22
23 2562. These defects and nonconformities substantially impaired the value of
24 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
25 basic sources. First, the Defective Vehicles fail in their essential purpose because
26 they present an unreasonably high risk of sudden unintended acceleration (a risk
27 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
28

1 Second, the repair and adjust warranty has failed of its essential purpose because
2 Toyota cannot repair or adjust the Defective Vehicles.

3 2563. Plaintiffs and the Class provided notice of their intent to seek revocation
4 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
5 (and many Class members) have requested that Toyota accept return of their vehicles
6 and return all payments made. Plaintiffs on behalf of themselves and the Class
7 hereby demand revocation and tender their Defective Vehicles.
8

9 2564. Plaintiffs and the Class would suffer economic hardship if they returned
10 their vehicles but did not receive the return of all payments made by them. Because
11 Toyota is refusing to acknowledge any revocation of acceptance and return
12 immediately any payments made, Plaintiffs and the Class have not re-accepted their
13 Defective Vehicles by retaining them, as they must continue using them due to the
14 financial burden of securing alternative means of transport for an uncertain and
15 substantial period of time.
16

17 2565. Finally, due to the Defendants' breach of warranties as set forth herein,
18 Plaintiffs and the Class assert as an additional and/or alternative remedy for a
19 revocation of acceptance of the goods, and for a return to Plaintiffs and to the Class
20 of the purchase price of all vehicles currently owned.
21

22 2566. Consequently, Plaintiffs and the Class are entitled to revoke their
23 acceptances, receive all payments made to Toyota, and to all incidental and
24 consequential damages, including the costs associated with purchasing safer vehicles,
25 and all other damages allowable under law, all in amounts to be proven at trial.
26
27
28

COUNT VI

BREACH OF CONTRACT/Common Law Warranty

(Based On South Dakota Law)

2567. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2568. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under South Dakota's Codified Laws, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

2569. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

2570. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

TENNESSEE

COUNT I

VIOLATION OF TENNESSEE CONSUMER PROTECTION ACT

(Tenn. Code Ann. § 47-18-101, *et seq.*)

2571. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

1 2572. Defendants misrepresented the safety of the Defective Vehicles after
2 learning of their defects with the intent that Plaintiffs relied on such representations
3 in their decision regarding the purchase, lease and/or use of the Defective Vehicles.

4 2573. Plaintiffs did, in fact, rely on such representations in their decision
5 regarding the purchase, lease and/or use of the Defective Vehicles.
6

7 2574. Through these misleading and deceptive statements and false promises,
8 Defendants violated the Tennessee Consumer Protection Act.

9 2575. The Tennessee Consumer Protection Act applies to Defendants'
10 transactions with Plaintiffs because Defendants' deceptive scheme was carried out in
11 Tennessee and affected Plaintiffs.
12

13 2576. Defendants also failed to advise the NHSTA and the public about what
14 they knew about the sudden and unintended acceleration defects in the Defective
15 Vehicles.

16 2577. Plaintiffs relied on Defendants' silence as to known defects in
17 connection with their decision regarding the purchase, lease and/or use of the
18 Defective Vehicles.
19

20 2578. As a direct and proximate result of Defendants' deceptive conduct and
21 violation of the Tennessee Consumer Protection Act, Plaintiffs have sustained and
22 will continue to sustain economic losses and other damages for which they are
23 entitled to compensatory and equitable damages and declaratory relief in an amount
24 to be proven at trial.
25
26
27
28

COUNT II

**FRAUDULENT MISREPRESENTATION &
FRAUDULENT CONCEALMENT**

(Based On Tennessee Law)

2579. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2580. As described above, Defendants made material omissions and affirmative misrepresentations regarding the Defective Vehicles.

2581. Defendants knew these representations were false when made.

2582. The vehicles purchased or leased by Plaintiffs were, in fact, defective, unsafe and unreliable, because the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms.

2583. Toyota had a duty to disclose that these vehicles were defective, unsafe and unreliable in that the vehicles were subject to sudden, extreme acceleration without adequate fail-safe mechanisms because Plaintiffs relied on Toyota's representations that the vehicles they were purchasing were safe and free from defects.

2584. The aforementioned concealment was material because if it had been disclosed Plaintiffs would not have bought or leased the vehicles.

2585. The aforementioned representations were material because they were facts that would typically be relied on by a person purchasing or leasing a new motor vehicle. Toyota knew or recklessly disregarded that its representations were false because it knew that people had died in its vehicles' unintended acceleration between

1 2002 and 2009. Toyota intentionally made the false statements in order to sell
2 vehicles.

3 2586. Plaintiffs relied on Toyota's reputation – along with Toyota's failure to
4 disclose the acceleration problems and Toyota's affirmative assurance that its
5 vehicles were safe and reliable and other similar false statements – in purchasing or
6 leasing Toyota's vehicles.
7

8 2587. As a result of their reliance, Plaintiffs have been injured in an amount to
9 be proven at trial, including, but not limited to, their lost benefit of the bargain and
10 overpayment at the time of purchase and/or the diminished value of their vehicles.
11

12 2588. Defendants' conduct was knowing, intentional, with malice,
13 demonstrated a complete lack of care, and was in reckless disregard for the rights of
14 Plaintiffs. Plaintiffs are therefore entitled to an award of punitive damages.

15 **COUNT III**

16 **BREACH OF EXPRESS WARRANTY**

17 **(Tenn. Code Ann. § 47-2-313)**

18 2589. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 2590. Defendants are and at all relevant times were sellers as defined by
21 TENN. CODE ANN. § 47-2-103.
22

23 2591. Defendants expressly affirmed – through uniform statements, “e-
24 brochures” and advertisements described above – that the vehicles were of high
25 quality, and, at a minimum, would actually work properly and safely. These
26 affirmations became part of the basis of the bargain.
27
28

2593. Plaintiffs have been damaged as a direct and proximate result of the breaches by Defendants in that the Defective Vehicles purchased by Plaintiffs were and are worth far less than what the Plaintiffs paid to purchase, which was reasonably foreseeable to Defendants.

2594. Plaintiffs were unaware of these defects and could not have reasonably discovered them when they purchased their vehicles from Toyota.

2595. Plaintiffs and the Class are entitled to damages, including the diminished value of their vehicles and the value of the non-use of the vehicles pending successful repair, in addition to any costs associated with purchasing safer vehicles, incidental and consequential damages, and all other damages allowable under the law, including such further relief as the Court deems just and proper.

COUNT IV

BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY

(Tenn. Code Ann. § 47-2-314)

2596. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2597. Defendants impliedly warranted that their vehicles were of good and merchantable quality and fit, and safe for their ordinary intended use – transporting the driver and passengers in reasonable safety during normal operation, and without unduly endangering them or members of the public.

2598. As described above, there were dangerous defects in the vehicles manufactured, distributed, and/or sold by Defendants, which Plaintiffs purchased,

1 including, but not limited to, defects that caused the vehicles to suddenly and
2 unintentionally accelerate, and the lack of safety systems which would prevent such
3 acceleration or allow a driver to safely slow and stop the vehicle when such
4 acceleration occurred.

5
6 2599. These dangerous defects existed at the time the vehicles left
7 Defendants' manufacturing facilities and at the time they were sold to the Plaintiffs.
8 Furthermore, because of these dangerous defects, Plaintiffs did not receive the
9 benefit of their bargain and the vehicles have suffered a diminution in value.

10 2600. These dangerous defects were the direct and proximate cause of
11 damages to the Plaintiffs.

12
13 **COUNT V**
14 **UNJUST ENRICHMENT**
15 **(Based On Tennessee Law)**

16 2601. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2602. Plaintiffs paid Toyota the value of vehicles that are non-defective, and
19 in exchange, Toyota provided Plaintiffs vehicles that are, in fact, defective.

20 2603. Further, Plaintiffs paid Toyota the value for vehicles that would not be
21 compromised by substantial, invasive repairs, and in return received vehicles that
22 require such repairs.

23
24 2604. Further, Plaintiffs paid Toyota for vehicles they could operate, and in
25 exchange, Toyota provided Plaintiffs vehicles that could not be normally operated
26 because their defects posed the possibility of life-threatening injuries or death.

2605. As such, Plaintiffs conferred a windfall upon Toyota, which knows of the windfall and has retained such benefits, which would be unjust for Toyota to retain.

2606. As a direct and proximate result of Toyota's unjust enrichment, Plaintiffs have suffered and continue to suffer various damages, including, but not limited to, restitution of all amounts by which Defendants were enriched through their misconduct.

TEXAS

COUNT I

VIOLATIONS OF THE TEXAS DECEPTIVE TRADE PRACTICES ACT

(Tex. Bus. & Com. Code §§ 17.41, *et seq.*)

2607. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2608. Defendants’ above-described acts and omissions constitute false, misleading or deceptive acts or practices under the Texas Deceptive Trade Practices—Consumer Protection Act, TEX. BUS. & COM. CODE § 17.41, *et seq.* (“Texas DTPA”).

2609. By failing to disclose and actively concealing the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS, Defendants engaged in deceptive business practices prohibited by the Texas DTPA, including (1) representing that Defective Vehicles have characteristics, uses, benefits, and qualities which they do not have, (2) representing that Defective Vehicles are of a particular standard, quality, and grade when they are not, (3) advertising Defective Vehicles with the intent not to sell them as advertised, (4) representing that a transaction involving Defective Vehicles

1 confers or involves rights, remedies, and obligations which it does not, and
2 (5) failing to disclose information concerning Defective Vehicles with the intent to
3 induce consumers to purchase or lease the Defective Vehicles.

4 2610. As alleged above, Defendants made numerous material statements about
5 the safety and reliability of Defective Vehicles that were either false or misleading.
6 Each of these statements contributed to the deceptive context of TMC's and TMS's
7 unlawful advertising and representations as a whole.
8

9 2611. Defendants' unfair or deceptive acts or practices were likely to and did
10 in fact deceive reasonable consumers, including Plaintiffs, about the true safety and
11 reliability of Defective Vehicles.
12

13 2612. In purchasing or leasing their vehicles, the Plaintiffs relied on the
14 misrepresentations and/or omissions of Toyota with respect of the safety and
15 reliability of the vehicles. Toyota's representations turned out not to be true because
16 the vehicles can unexpectedly and dangerously accelerate out of the drivers' control.
17 Had the Named Plaintiffs known this they would not have purchased or leased their
18 Defective Vehicles and/or paid as much for them.
19

20 2613. Defendants also breached express and implied warranties to Plaintiffs
21 and the Class, as set out above, and are, therefore liable to Plaintiffs and the Class for
22 damages under §§ 17.50(a)(2) and 17.50(b) of the Texas DTPA. Defendants'
23 actions also constitute an unconscionable action or course of action under
24 § 17.50(a)(3) of the Texas DTPA.
25

26 2614. Plaintiffs and the Class sustained damages as a result of the Defendants
27 unlawful acts and are, therefore, entitled to damages and other relief provided for
28 under § 17.50(b) of the Texas DTPA. Because Defendants' conduct was committed

1 knowingly and/or intentionally, the Plaintiffs and the Class are entitled to treble
2 damages.

3 2615. For those Plaintiffs and the Class who wish to rescind their purchases,
4 they are entitled under § 17.50(b)(4) to rescission and other relief necessary to
5 restore any money or property that was acquired from them based on violations of
6 the Texas DTPA.
7

8 2616. Plaintiffs and the Class also seek court costs and attorneys' fees under
9 § 17.50(d) of the Texas DTPA.

10 **COUNT II**
11 **BREACH OF EXPRESS WARRANTY**
12 **(Tex. Bus. & Com. Code § 2.313)**

13 2617. Plaintiffs reallege and incorporate by reference all paragraphs as though
14 fully set forth herein.
15

16 2618. Toyota is and was at all relevant times a merchant with respect to motor
17 vehicles under TEX. BUS. & COM. CODE § 2.104.

18 2619. In the course of selling its vehicles, Toyota expressly warranted in
19 writing that the Vehicles were covered by a Basic Warranty.

20 2620. Toyota breached the express warranty to repair and adjust to correct
21 defects in materials and workmanship of any part supplied by Toyota. Toyota has
22 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
23 materials and workmanship defects.
24

25 2621. In addition to this Basic Warranty, Toyota expressly warranted several
26 attributes, characteristics and qualities as set forth above.
27
28

1 2622. These warranties are only a sampling of the numerous warranties that
2 Toyota made relating to safety, reliability and operation, which are more fully
3 outlined in Section IV.A., *supra*. Generally these express warranties promise
4 heightened, superior, and state-of-the-art safety, reliability, performance standards,
5 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
6 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
7 Toyota to be made by salespeople. These affirmations and promises were part of the
8 basis of the bargain between the parties.
9

10 2623. These additional warranties were also breached because the Defective
11 Vehicles were not fully operational, safe, or reliable (and remained so even after the
12 problems were acknowledged and a recall "fix" was announced), nor did they
13 comply with the warranties expressly made to purchasers or lessees. Toyota did not
14 provide at the time of sale, and has not provided since then, vehicles conforming to
15 these express warranties.
16

17 2624. Furthermore, the limited warranty of repair and/or adjustments to
18 defective parts, fails in its essential purpose because the contractual remedy is
19 insufficient to make the Plaintiffs and the Class whole and because the Defendants
20 have failed and/or have refused to adequately provide the promised remedies within
21 a reasonable time.
22

23 2625. Accordingly, recovery by the Plaintiffs is not limited to the limited
24 warranty of repair or adjustments to parts defective in materials or workmanship, and
25 Plaintiffs seek all remedies as allowed by law.
26

27 2626. Also, as alleged in more detail herein, at the time that Defendants
28 warranted and sold the vehicles they knew that the vehicles did not conform to the

1 warranties and were inherently defective, and Defendants wrongfully and
2 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
3 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
4 and/or fraudulent pretenses. The enforcement under these circumstances of any
5 limitations whatsoever precluding the recovery of incidental and/or consequential
6 damages is unenforceable.
7

8 2627. Moreover, many of the damages flowing from the Defective Vehicles
9 cannot be resolved through the limited remedy of “replacement or adjustments,” as
10 those incidental and consequential damages have already been suffered due to
11 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
12 continued failure to provide such limited remedy within a reasonable time, and any
13 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
14 Plaintiffs and the Class whole.
15

16 2628. Finally, due to the Defendants’ breach of warranties as set forth herein,
17 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
18 in TEX. BUS. & COM. CODE § 2.711, for a revocation of acceptance of the goods, and
19 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
20 currently owned and for such other incidental and consequential damages as allowed
21 under TEX. BUS & COM. CODE §§ 2.711 and 2.608.
22

23 2629. Toyota was provided notice of these issues by numerous complaints
24 filed against it, including the instant complaint, and by numerous individual letters
25 and communications sent by Plaintiffs and the Class before or within a reasonable
26 amount of time after Toyota issued the recall and the allegations of vehicle defects
27 became public.
28

COUNT III

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Tex. Bus. & Com. Code § 2.314)

2632. Toyota is and was at all relevant times a merchant with respect to motor vehicles under TEX. BUS. & COM. CODE § 2.104.

2634. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public

3 2636. As a direct and proximate result of Toyota's breach of the warranties of
4 merchantability, Plaintiffs and the Class have been damaged in an amount to be
5 proven at trial.
6

7 **COUNT IV**
8 **REVOCATION OF ACCEPTANCE**
9 **(Tex. Bus. & Com. Code § 2.608)**

10 2637. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2638. Plaintiffs identified above demanded revocation and the demands were
13 refused.
14

15 2639. Plaintiffs and the Class had no knowledge of such defects and
16 nonconformities, were unaware of these defects, and reasonably could not have
17 discovered them when they purchased or leased their automobiles from Toyota. On
18 the other hand, Toyota was aware of the defects and nonconformities at the time of
19 sale and thereafter.

20 2640. Acceptance was reasonably induced by the difficulty of discovery of the
21 defects and nonconformities before acceptance.
22

23 2641. There has been no substantial change in the condition of Plaintiffs'
24 vehicles not caused by the defects and nonconformities.

25 2642. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
26 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
27 paid.
28

1 2643. Plaintiffs and the Class would suffer economic hardship if they returned
2 their vehicles but did not receive the return of all payments made by them. Because
3 Toyota is refusing to acknowledge any revocation of acceptance and return
4 immediately any payments made, Plaintiffs and the Class have not re-accepted their
5 Defective Vehicles by retaining them.
6

7 2644. These defects and nonconformities substantially impaired the value of
8 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
9 basic sources. First, the Defective Vehicles fail in their essential purpose because
10 they present an unreasonably high risk of sudden unintended acceleration (a risk
11 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
12 Second, the repair and adjust warranty has failed of its essential purpose because
13 Toyota cannot repair or adjust the Defective Vehicles.
14

15 2645. Plaintiffs and the Class provided notice of their intent to seek revocation
16 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
17 (and many Class members) have requested that Toyota accept return of their vehicles
18 and return all payments made. Plaintiffs on behalf of themselves and the Class
19 hereby demand revocation and tender their Defective Vehicles.
20

21 2646. Plaintiffs and the Class would suffer economic hardship if they returned
22 their vehicles but did not receive the return of all payments made by them. Because
23 Toyota is refusing to acknowledge any revocation of acceptance and return
24 immediately any payments made, Plaintiffs and the Class have not re-accepted their
25 Defective Vehicles by retaining them, as they must continue using them due to the
26 financial burden of securing alternative means of transport for an uncertain and
27 substantial period of time.
28

1 2647. Finally, due to the Defendants' breach of warranties as set forth herein,
2 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
3 in TEX. BUS. & COM. CODE § 2.711, for a revocation of acceptance of the goods, and
4 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
5 currently owned and for such other incidental and consequential damages as allowed
6 under TEX. BUS. & COM. CODE § 2.711.
7

8 2648. Consequently, Plaintiffs and the Class are entitled to revoke their
9 acceptances, receive all payments made to Toyota, and to all incidental and
10 consequential damages, including the costs associated with purchasing safer
11 vehicles, and all other damages allowable under law, all in amounts to be proven at
12 trial.
13

14 **COUNT V**
15 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
16 **(Based On Texas Law)**

17 2649. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 2650. To the extent Toyota's repair or adjust commitment is deemed not to be
20 a warranty under the Texas Business and Commerce Code, Plaintiffs plead in the
21 alternative under common law warranty and contract law. Toyota limited the
22 remedies available to Plaintiffs and the Class to just repairs and adjustments needed
23 to correct defects in materials or workmanship of any part supplied by Toyota,
24 and/or warranted the quality or nature of those services to Plaintiffs.
25
26
27
28

2652. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

2653. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2655. Defendants had a duty to disclose these safety issues because they consistently marketed their vehicles as safe and proclaimed that safety is one of Toyota's highest corporate priorities. Once Defendants made representations to the public about safety, Defendants were under a duty to disclose these omitted facts, because where one does speak one must speak the whole truth and not conceal any facts which materially qualify those facts stated. One who volunteers information must be truthful, and the telling of a half-truth calculated to deceive is fraud.

1 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
2 were material because they directly impact the safety of the Defective Vehicles.
3 Whether or not a vehicle accelerates only at the driver's command, and whether a
4 vehicle will stop or not upon application of the brake by the driver, are material
5 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
6 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
7

8 2657. Defendants were deliberately silent and actively concealed and/or
9 suppressed these material facts, in whole or in part, with the intent to induce
10 Plaintiffs and the Class to purchase Defective Vehicles at a higher price for the
11 vehicles, which did not match the vehicles' true value.
12

13 2658. Defendants still have not made full and adequate disclosure and
14 continue to defraud Plaintiffs and the Class.

15 2659. Plaintiffs and the Class were unaware of these omitted material facts
16 and would not have acted as they did if they had known of the concealed and/or
17 suppressed facts. Plaintiffs' and the Class' actions were reasonable and justified.
18 Defendants were in exclusive control of the material facts and such facts were not
19 known to the public or the Class.
20

21 2660. As a result of the concealment and/or suppression of the facts, Plaintiffs
22 and the Class sustained damage. For those Plaintiffs and the Class who elect to
23 affirm the sale, these damages include the difference between the actual value of that
24 which Plaintiffs and the Class paid and the actual value of that which they received,
25 together with additional damages arising from the sales transaction, amounts
26 expended in reliance upon the fraud, compensation for loss of use and enjoyment of
27 the property, and/or lost profits. For those Plaintiffs and the Class who want to
28

1 rescind the purchase, then those Plaintiffs and the Class are entitled to restitution and
2 consequential damages.

3 2661. Defendants' acts were done maliciously, oppressively, deliberately, with
4 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
5 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
6 punitive damages in an amount sufficient to deter such conduct in the future, which
7 amount is to be determined according to proof.

9 **COUNT VII**
10 **UNJUST ENRICHMENT**
11 **(Based On Texas Law)**

12 2662. Plaintiffs reallege and incorporate by reference all paragraphs as though
13 fully set forth herein.

14 2663. As a result of their wrongful and fraudulent acts and omissions, as set
15 forth above, pertaining to the design defect of their vehicles and the concealment of
16 the defect, Defendants charged a higher price for their vehicles than the vehicles'
17 true value and Defendants obtained monies which rightfully belong to Plaintiffs.

18 2664. Defendants enjoyed the benefit of increased financial gains, to the
19 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which
20 actually had lower values. It would be inequitable, unjust, and unconscionable for
21 Defendants to retain these wrongfully obtained profits.

22 2665. Plaintiffs, therefore, seek an order establishing Defendants as
23 constructive trustees of the profits unjustly obtained, plus interest.
24
25
26
27
28

UTAH
COUNT I
BREACH OF EXPRESS WARRANTY
(Utah Code Ann. § 70A-2-313)

2666. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2667. Toyota is and was at all relevant times a merchant as defined by the Uniform Commercial Code.

2668. In the course of selling its vehicles, Toyota expressly warranted in writing that the Vehicles were covered by a Basic Warranty.

2669. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the Vehicles' materials and workmanship defects.

2670. In addition to this Basic Warranty, Toyota expressly warranted several attributes, characteristics and qualities, as set forth above.

2671. These warranties are only a sampling of the numerous warranties that Toyota made relating to safety, reliability and operation, which are more fully outlined in Section IV.A., *supra*. Generally these express warranties promise heightened, superior, and state-of-the-art safety, reliability, performance standards, and promote the benefits of ETCS. These warranties were made, *inter alia*, in advertisements, in Toyota's "e brochures," and in uniform statements provided by Toyota to be made by salespeople. These affirmations and promises were part of the basis of the bargain between the parties.

1 2672. These additional warranties were also breached because the Defective
2 Vehicles were not fully operational, safe, or reliable (and remained so even after the
3 problems were acknowledged and a recall “fix” was announced), nor did they
4 comply with the warranties expressly made to purchasers or lessees. Toyota did not
5 provide at the time of sale, and has not provided since then, vehicles conforming to
6 these express warranties.
7

8 2673. Furthermore, the limited warranty of repair and/or adjustments to
9 defective parts, fails in its essential purpose because the contractual remedy is
10 insufficient to make the Plaintiffs and the Class whole and because the Defendants
11 have failed and/or have refused to adequately provide the promised remedies within
12 a reasonable time.
13

14 2674. Accordingly, recovery by the Plaintiffs is not limited to the limited
15 warranty of repair or adjustments to parts defective in materials or workmanship, and
16 Plaintiffs seek all remedies as allowed by law.
17

18 2675. Also, as alleged in more detail herein, at the time that Defendants
19 warranted and sold the vehicles they knew that the vehicles did not conform to the
20 warranties and were inherently defective, and Defendants wrongfully and
21 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
22 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
23 and/or fraudulent pretenses.
24

25 2676. Moreover, many of the damages flowing from the Defective Vehicles
26 cannot be resolved through the limited remedy of “replacement or adjustments,” as
27 those incidental and consequential damages have already been suffered due to
28 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or

1 continued failure to provide such limited remedy within a reasonable time, and any
2 limitation on Plaintiffs' and the Class' remedies would be insufficient to make
3 Plaintiffs and the Class whole.

4 2677. Finally, due to the Defendants' breach of warranties as set forth herein,
5 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
6 in U.C.A. § 70A-2-608 for a revocation of acceptance of the goods, and for a return
7 to Plaintiffs and to the Class of the purchase price of all vehicles currently.
8

9 2678. Toyota was provided notice of these issues by numerous complaints
10 filed against it, including the instant complaint, and by numerous individual letters
11 and communications sent by Plaintiffs and the Class before or within a reasonable
12 amount of time after Toyota issued the recall and the allegations of vehicle defects
13 became public.
14

15 2679. As a direct and proximate result of Toyota's breach of express
16 warranties, Plaintiffs and the Class have been damaged in an amount to be
17 determined at trial.
18

19 **COUNT II**

20 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**

21 **(Utah Code Ann. § 70A-2-314)**

22 2680. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 2681. Toyota is and was at all relevant times a merchant with respect to motor
25 vehicles.

26 2682. A warranty that the Defective Vehicles were in merchantable condition
27 was implied by law in the instant transactions.
28

2683. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2684. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2685. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT III
REVOCATION OF ACCEPTANCE
(Utah Code Ann. § 70A-2-608)

2686. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2687. Plaintiffs identified above demanded revocation and the demands were refused.

2688. Plaintiffs and the Class had no knowledge of such defects and nonconformities, were unaware of these defects, and reasonably could not have

1 discovered them when they purchased or leased their automobiles from Toyota. On
2 the other hand, Toyota was aware of the defects and nonconformities at the time of
3 sale and thereafter.

4 2689. Acceptance was reasonably induced by the difficulty of discovery of the
5 defects and nonconformities before acceptance.

6 2690. There has been no change in the condition of Plaintiffs' vehicles not
7 caused by the defects and nonconformities.

8 2691. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
9 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
10 paid.
11

12 2692. Plaintiffs and the Class would suffer economic hardship if they returned
13 their vehicles but did not receive the return of all payments made by them. Because
14 Toyota is refusing to acknowledge any revocation of acceptance and return
15 immediately any payments made, Plaintiffs and the Class have not re-accepted their
16 Defective Vehicles by retaining them.
17

18 2693. These defects and nonconformities substantially impaired the value of
19 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
20 basic sources. First, the Defective Vehicles fail in their essential purpose because
21 they present an unreasonably high risk of sudden unintended acceleration (a risk
22 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
23 Second, the repair and adjust warranty has failed of its essential purpose because
24 Toyota cannot repair or adjust the Defective Vehicles.
25

26 2694. Plaintiffs and the Class provided notice of their intent to seek revocation
27 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
28

1 (and many Class members) have requested that Toyota accept return of their vehicles
2 and return all payments made. Plaintiffs on behalf of themselves and the Class
3 hereby demand revocation and tender their Defective Vehicles.

4 2695. Plaintiffs and the Class would suffer economic hardship if they returned
5 their vehicles but did not receive the return of all payments made by them. Because
6 Toyota is refusing to acknowledge any revocation of acceptance and return
7 immediately any payments made, Plaintiffs and the Class have not re-accepted their
8 Defective Vehicles by retaining them, as they must continue using them due to the
9 financial burden of securing alternative means of transport for an uncertain and
10 substantial period of time.

11 2696. Finally, due to the Defendants' breach of warranties as set forth herein,
12 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
13 in U.C.A § 70A-2-608, for a revocation of acceptance of the goods, and for a return
14 to Plaintiffs and to the Class of the purchase price of all vehicles currently owned.

15 2697. Consequently, Plaintiffs and the Class are entitled to revoke their
16 acceptances, receive all payments made to Toyota, and to all incidental and
17 consequential damages, including the costs associated with purchasing safer vehicles,
18 and all other damages allowable under law, all in amounts to be proven at trial.

19
20
21
22 **COUNT IV**

23 **BREACH OF CONTRACT/COMMON LAW WARRANTY**

24 **(Based On Utah Law)**

25 2698. Plaintiffs reallege and incorporate by reference all paragraphs as though
26 fully set forth herein.

1 2699. To the extent Toyota's repair or adjust commitment is deemed not to be
2 a warranty under the Utah Code, Plaintiffs plead in the alternative under common
3 law warranty and contract law. Toyota limited the remedies available to Plaintiffs
4 and the Class to just repairs and adjustments needed to correct defects in materials or
5 workmanship of any part supplied by Toyota, and/or warranted the quality or nature
6 of those services to Plaintiffs.
7

8 2700. Toyota breached this warranty or contract obligation by failing to repair
9 the Defective Vehicles evidencing a sudden unintended acceleration problem,
10 including those that were recalled, or to replace them.
11

12 2701. As a direct and proximate result of Defendants' breach of contract or
13 common law warranty, Plaintiffs and the Class have been damaged in an amount to
14 be proven at trial, which shall include, but is not limited to, all compensatory
15 damages, incidental and consequential damages, and other damages allowed by law.
16

17 **COUNT V**
18 **UNJUST ENRICHMENT**
19 **(Based On Utah Law)**

20 2702. Plaintiffs reallege and incorporate by reference all paragraphs as though
21 fully set forth herein.

22 2703. As a result of their wrongful and fraudulent acts and omissions, as set
23 forth above, pertaining to the design defect of their vehicles and the concealment of
24 the defect, Defendants charged a higher price for their vehicles than the vehicles'
25 true value and Defendants obtained monies which rightfully belong to Plaintiffs.
26

27 2704. Defendants enjoyed the benefit of increased financial gains, to the
28 detriment of Plaintiffs and the Class, who paid a higher price for vehicles which

1 actually had lower values. It would be inequitable and unjust for Defendants to
2 retain these wrongfully obtained profits.

3 2705. Plaintiffs, therefore, seek an order establishing Defendants as
4 constructive trustees of the profits unjustly obtained, plus interest.
5

6 **VERMONT**
7 **COUNT I**
8 **VIOLATION OF VERMONT CONSUMER FRAUD ACT**
9 **(Vt. Stat. Ann. tit. 9, § 2451 *et seq.*)**

10 2706. Plaintiffs reallege and incorporate by reference all paragraphs as though
11 fully set forth herein.

12 2707. The Vermont Consumer Fraud Act (“VCFA”) makes unlawful “[u]nfair
13 methods of competition in commerce, and unfair or deceptive acts or practices in
14 commerce....” Vt. Stat. Ann. tit. 9, § 2453(a).
15

16 2708. Toyota is a seller within the meaning of the VCFA. Vt. Stat. Ann. tit. 9,
17 § 2451(a)(c).

18 2709. In the course of Toyota’s business, it willfully failed to disclose and
19 actively concealed the dangerous risk of throttle control failure and the lack of
20 adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as
21 described above. This was a deceptive act in that Toyota represented that Defective
22 Vehicles have characteristics, uses, benefits, and qualities which they do not have;
23 represented that Defective Vehicles are of a particular standard and quality when
24 they are not; and advertised Defective Vehicles with the intent not to sell them as
25 advertised. Toyota knew or should have known that its conduct violated the VCFA.
26
27
28

1 2710. Toyota engaged in a deceptive trade practice under the VCFA when it
2 failed to disclose material information concerning the Toyota vehicles which was
3 known to Toyota at the time of the sale. Toyota deliberately withheld the
4 information about the vehicles' propensity for rapid, uncontrolled acceleration in
5 order to ensure that consumers would purchase its vehicles and to induce the
6 consumer to enter into a transaction.
7

8 2711. The information withhold was material in that it was information that
9 was important to consumers and likely to affect their choice of, or conduct regarding,
10 the purchase of their cars. Toyota's withholding of this information was likely to
11 mislead consumers acting reasonably under the circumstances. The propensity of the
12 Toyotas for rapid, uncontrolled acceleration and their lack of a fail-safe mechanism
13 were material to Plaintiffs and the Class. Had Plaintiffs and the Class known that
14 their Toyotas had these serious safety defects, they would not have purchased their
15 Toyotas.
16

17 2712. Toyota's conduct has caused or is to cause a substantial injury that is
18 not reasonably avoided by consumers, and the harm is not outweighed by a
19 countervailing benefit to consumers or competition.
20

21 2713. Plaintiffs and the Class have suffered injury and damages as a result of
22 Toyota's false or fraudulent representations and practices in violation of § 2453.
23 Plaintiffs and the Class overpaid for their vehicles and did not receive the benefit of
24 their bargain. The value of their Toyota's has diminished now that the safety issues
25 have come to light, and Plaintiffs and the Class own vehicles that are not safe.
26

27 2714. Plaintiffs are entitled to recover "appropriate equitable relief" and "the
28 amount of [their] damages, or the consideration or the value of the consideration

1 given by [them], reasonable attorney's fees, and exemplary damages not exceeding
2 three times the value of the consideration given by [them]" pursuant to Vt. Stat. Ann.
3 tit. 9, § 2461(b).

4
5 **COUNT II**
6 **BREACH OF EXPRESS WARRANTY**
7 **(Vt. Stat. Ann. tit. 9A § 2-313)**

8 2715. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 2716. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles.

12 2717. In the course of selling its vehicles, Toyota expressly warranted in
13 writing that the Vehicles were covered by a Basic Warranty.

14 2718. Toyota breached the express warranty to repair and adjust to correct
15 defects in materials and workmanship of any part supplied by Toyota. Toyota has
16 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
17 materials and workmanship defects.

18 2719. In addition to this Basic Warranty, Toyota expressly warranted several
19 attributes, characteristics and qualities, as set forth above.

20 2720. These warranties are only a sampling of the numerous warranties that
21 Toyota made relating to safety, reliability and operation, which are more fully
22 outlined in Section IV.A., *supra*. Generally these express warranties promise
23 heightened, superior, and state-of-the-art safety, reliability, performance standards,
24 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
25 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
26
27
28

1 Toyota to be made by salespeople. These affirmations and promises were part of the
2 basis of the bargain between the parties.

3 2721. These additional warranties were also breached because the Defective
4 Vehicles were not fully operational, safe, or reliable (and remained so even after the
5 problems were acknowledged and a recall “fix” was announced), nor did they
6 comply with the warranties expressly made to purchasers or lessees. Toyota did not
7 provide at the time of sale, and has not provided since then, vehicles conforming to
8 these express warranties.
9

10 2722. Furthermore, the limited warranty of repair and/or adjustments to
11 defective parts, fails in its essential purpose because the contractual remedy is
12 insufficient to make the Plaintiffs and the Class whole and because the Defendants
13 have failed and/or have refused to adequately provide the promised remedies within
14 a reasonable time.
15

16 2723. Accordingly, recovery by the Plaintiffs is not limited to the limited
17 warranty of repair or adjustments to parts defective in materials or workmanship, and
18 Plaintiffs seek all remedies as allowed by law.
19

20 2724. Also, as alleged in more detail herein, at the time that Defendants
21 warranted and sold the vehicles they knew that the vehicles did not conform to the
22 warranties and were inherently defective, and Defendants wrongfully and
23 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
24 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
25 and/or fraudulent pretenses.
26

27 2725. Moreover, many of the damages flowing from the Defective Vehicles
28 cannot be resolved through the limited remedy of “replacement or adjustments,” as

1 those incidental and consequential damages have already been suffered due to their
2 failure and/or continued failure to provide such limited remedy within a reasonable
3 time, and any limitation on Plaintiffs' and the Class' remedies would be insufficient
4 to make Plaintiffs and the class whole.

5
6 2726. Finally, due to the Defendants' breach of warranties as set forth herein,
7 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set for in
8 Vt. Stat. Ann. tit. 9, § 2-608, for revocation of acceptance of the goods, and for a
9 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
10 owned.

11
12 2727. Toyota was provided notice of these issues by numerous complaints
13 filed against it, including the instant complaint, and by numerous individual letters
14 and communications sent by Plaintiffs and the Class before or within a reasonable
15 amount of time after Toyota issued the recall and the allegations of vehicle defects
16 became public.

17
18 2728. As a direct and proximate result of Toyota's breach of express
19 warranties, Plaintiffs and the Class have been damaged in an amount to be
20 determined at trial.

21 **COUNT III**

22 **BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY**

23 **(Vt. Stat. Ann. tit. 9A §2-314)**

24 2729. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 2730. Toyota is and was at all relevant times a merchant with respect to motor
27 vehicles.
28

2731. A warranty that the Defective Vehicles were in merchantable condition is implied by law in the instant transactions.

2732. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2733. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and members of the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2734. As a direct and proximate result of Toyota's breach of the warranties of merchantability, Plaintiffs and the Class have been damaged in an amount to be proven at trial.

COUNT IV
REVOCATION OF ACCEPTANCE
(Vt. Stat. Ann. tit. 9A §2-608)

2735. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2736. Plaintiffs identified above demanded revocation and the demands were refused.

1 2737. Plaintiffs and the Class had no knowledge of such defects and
2 nonconformities, were unaware of these defects, and reasonably could not have
3 discovered them when they purchased or leased their automobiles from Toyota. On
4 the other hand, Toyota was aware of the defects and nonconformities at the time of
5 sale and thereafter.

6
7 2738. Acceptance was reasonably induced by the difficulty of discovery of the
8 defects and nonconformities before acceptance.

9 2739. There has been no change in the condition of Plaintiffs' vehicles not
10 caused by the defects and nonconformities.

11 2740. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
12 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
13 paid.

14
15 2741. Plaintiffs and the Class would suffer economic hardship if they returned
16 their vehicles but did not receive the return of all payments made by them. Because
17 Toyota is refusing to acknowledge any revocation of acceptance and return
18 immediately any payments made, Plaintiffs and the Class have not re-accepted their
19 Defective Vehicles by retaining them.

20
21 2742. These defects and nonconformities substantially impaired the value of
22 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
23 basic sources. First, the Defective Vehicles fail in their essential purpose because
24 they present an unreasonably high risk of sudden unintended acceleration (a risk
25 acknowledged by Toyota's recall), rendering them unsafe in a material way. Second,
26 the repair and adjust warranty has failed of its essential purpose because Toyota
27 cannot repair or adjust the Defective Vehicles.

1 2743. Plaintiffs and the Class provided notice of their intent to seek revocation
2 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
3 (and many Class members) have requested that Toyota accept return of their vehicles
4 and return all payments made. Plaintiffs on behalf of themselves and the Class
5 hereby demand revocation and tender their Defective Vehicles.
6

7 2744. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them, as they must continue using them due to the
12 financial burden of securing alternative means of transport for an uncertain and
13 substantial period of time.
14

15 2745. Consequently, Plaintiffs and the Class are entitled to revoke their
16 acceptances, receive all payments made to Toyota, and to all incidental and
17 consequential damages, including the costs associated with purchasing safer
18 vehicles, and all other damages allowable under law, all in amounts to be proven at
19 trial.
20

21 **COUNT V**
22 **BREACH OF CONTRACT**
23 **(Based On Vermont Law)**

24 2746. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 2747. To the extent Toyota's repair or adjust commitment is deemed not to be
27 a warranty under Vermont's Commercial Code, Plaintiffs plead in the alternative
28

1 under common law contract law. Toyota limited the remedies available to Plaintiffs
2 and the Class to just repairs and adjustments needed to correct defects in materials or
3 workmanship of any part supplied by Toyota, and/or warranted the quality or nature
4 of those services to Plaintiffs.

5
6 2748. Toyota breached this contract obligation by failing to repair the
7 Defective Vehicles evidencing a sudden unintended acceleration problem, including
8 those that were recalled, or to replace them.

9 2749. As a direct and proximate result of Defendants' breach of contract,
10 Plaintiffs and the Class have been damaged in an amount to be proven at trial, which
11 shall include, but is not limited to, all compensatory damages, incidental and
12 consequential damages, and other damages allowed by law.

13
14 **COUNT VI**
15 **UNJUST ENRICHMENT**
16 **(Based On Vermont Law)**

17 2750. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 2751. Toyota had knowledge of the safety defects in its vehicles, which it
20 failed to disclose to Plaintiffs and the Class.

21 2752. As a result of its wrongful and fraudulent acts and omissions, as set
22 forth above, pertaining to the design defect of their vehicles and the concealment of
23 the defect, Toyota charged a higher price for its vehicles than the vehicles' true
24 value. Toyota accordingly received a benefit from Plaintiffs to Plaintiffs' detriment.

25 2753. Toyota appreciated, accepted and retained the benefits conferred by
26 Plaintiffs and the Class, who without knowledge of the safety defects paid a higher
27
28

1 price for vehicles which actually had lower values. It would be inequitable and
2 unjust for Toyota to retain these wrongfully obtained profits.

3 2754. Plaintiffs, therefore, are entitled to restitution and seek an order
4 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
5 interest.
6

7 **WASHINGTON**

8 **COUNT I**

9 **VIOLATION OF THE CONSUMER PROTECTION ACT**

10 **(Rev. Code Wash. Ann. §§ 19.86.010, *et seq.*)**

11 2755. Plaintiffs reallege and incorporate by reference all paragraphs as though
12 fully set forth herein.

13 2756. The conduct of Toyota as set forth herein constitutes unfair or deceptive
14 acts or practices, including, but not limited to, Toyota's manufacture and sale of
15 vehicles with a sudden acceleration defect that lack brake-override or other effective
16 fail-safe mechanisms, which Toyota failed to adequately investigate, disclose and
17 remedy, and its misrepresentations and omissions regarding the safety and reliability
18 of its vehicles.
19

20 2757. Toyota's actions as set forth above occurred in the conduct of trade or
21 commerce.
22

23 2758. Toyota's actions impact the public interest because Plaintiffs were
24 injured in exactly the same way as millions of others purchasing and/or leasing
25 Toyota vehicles as a result of Toyota's generalized course of deception. All of the
26 wrongful conduct alleged herein occurred, and continues to occur, in the conduct of
27 Toyota's business.
28

1 2759. Plaintiffs and the Class were injured as a result of Defendant's conduct.
2 Plaintiffs overpaid for their Defective Vehicles and did not receive the benefit of
3 their bargain, and their vehicles have suffered a diminution in value.

4 2760. Toyota's conduct proximately caused the injuries to Plaintiffs and the
5 Class.
6

7 2761. Toyota is liable to Plaintiffs and the Class for damages in amounts to be
8 proven at trial, including attorneys' fees, costs, and treble damages.

9 2762. Pursuant to WASH. REV. CODE. ANN. § 19.86.095, Plaintiffs will serve
10 the Washington Attorney General with a copy of this complaint as Plaintiffs seek
11 injunctive relief.
12

13 **COUNT II**
14 **BREACH OF EXPRESS WARRANTY**
15 **(Rev. Code Wash. § 62A.2-313)**

16 2763. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2764. Toyota is and was at all relevant times a merchant with respect to motor
19 vehicles.

20 2765. In the course of selling its vehicles, Toyota expressly warranted in
21 writing that the Vehicles were covered by a Basic Warranty.
22

23 2766. Toyota breached the express warranty to repair and adjust to correct
24 defects in materials and workmanship of any part supplied by Toyota. Toyota has
25 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
26 materials and workmanship defects.
27
28

1 2767. In addition to this Basic Warranty, Toyota expressly warranted several
2 attributes, characteristics and qualities, as set forth above.

3 2768. These warranties are only a sampling of the numerous warranties that
4 Toyota made relating to safety, reliability and operation, which are more fully
5 outlined in Section IV.A., *supra*. Generally these express warranties promise
6 heightened, superior, and state-of-the-art safety, reliability, performance standards,
7 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
8 advertisements, in Toyota's "e brochures," and in uniform statements provided by
9 Toyota to be made by salespeople. These affirmations and promises were part of the
10 basis of the bargain between the parties.
11

12 2769. These additional warranties were also breached because the Defective
13 Vehicles were not fully operational, safe, or reliable (and remained so even after the
14 problems were acknowledged and a recall "fix" was announced), nor did they
15 comply with the warranties expressly made to purchasers or lessees. Toyota did not
16 provide at the time of sale, and has not provided since then, vehicles conforming to
17 these express warranties.
18

19 2770. Furthermore, the limited warranty of repair and/or adjustments to
20 defective parts, fails in its essential purpose because the contractual remedy is
21 insufficient to make the Plaintiffs and the Class whole and because the Defendants
22 have failed and/or have refused to adequately provide the promised remedies within
23 a reasonable time.
24

25 2771. Accordingly, recovery by the Plaintiffs is not limited to the limited
26 warranty of repair or adjustments to parts defective in materials or workmanship, and
27 Plaintiffs seek all remedies as allowed by law.
28

1 2772. Also, as alleged in more detail herein, at the time that Defendants
2 warranted and sold the vehicles they knew that the vehicles did not conform to the
3 warranties and were inherently defective, and Defendants wrongfully and
4 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
5 Plaintiff and the Class were therefore induced to purchase the vehicles under false
6 and/or fraudulent pretenses.
7

8 2773. Moreover, many of the damages flowing from the Defective Vehicles
9 cannot be resolved through the limited remedy of “replacement or adjustments,” as
10 those incidental and consequential damages have already been suffered due to
11 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
12 continued failure to provide such limited remedy within a reasonable time, and any
13 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
14 Plaintiffs and the Class whole.
15

16 2774. Finally, due to the Defendants’ breach of warranties as set forth herein,
17 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
18 in REV. CODE WASH. § 62A.2-608, for a revocation of acceptance of the goods, and
19 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
20 currently owned.
21

22 2775. Toyota was provided notice of these issues by numerous complaints
23 filed against it, including the instant complaint, and by numerous individual letters
24 and communications sent by Plaintiffs and the Class before or within a reasonable
25 amount of time after Toyota issued the recall and the allegations of vehicle defects
26 became public.
27
28

1 2776. As a direct and proximate result of Toyota's breach of express
2 warranties, Plaintiffs and the Class have been damaged in an amount to be
3 determined at trial.

4
5 **COUNT III**
6 **BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY**
7 **(Rev. Code Wash. § 62A.2-614)**

8 2777. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 2778. Toyota is and was at all relevant times a merchant with respect to motor
11 vehicles.

12 2779. A warranty that the Defective Vehicles were in merchantable condition
13 is implied by law in the instant transactions.

14 2780. These vehicles, when sold and at all times thereafter, were not in
15 merchantable condition and are not fit for the ordinary purpose for which cars are
16 used. Specifically, the Defective Vehicles are inherently defective in that there are
17 defects in the vehicle control systems that permit sudden unintended acceleration to
18 occur; the Defective Vehicles do not have an adequate fail-safe to protect against
19 such SUA events, nor do they have a brake-override; and the ETCS system was not
20 adequately tested.
21

22 2781. Toyota was provided notice of these issues by numerous complaints
23 filed against it, including the instant complaint, and by numerous individual letters
24 and communications sent by Plaintiffs and the Class before or within a reasonable
25 amount of time after Toyota issued the recall and the allegations of vehicle defects
26 became public.
27
28

1 2782. Privity is not required in this case because Plaintiffs and the Class are
2 intended third-party beneficiaries of contracts between Toyota and its dealers;
3 specifically, they are the intended beneficiaries of Toyota's implied warranties. The
4 dealers were not intended to be the ultimate consumers of the Defective Vehicles and
5 have no rights under the warranty agreements provided with the Defective Vehicles;
6 the warranty agreements were designed for and intended to benefit the ultimate
7 consumers only.
8

9 2783. As a direct and proximate result of Toyota's breach of the warranties of
10 merchantability, Plaintiffs and the Class have been damaged in an amount to be
11 proven at trial.
12

13 **COUNT IV**
14 **REVOCATION OF ACCEPTANCE**
15 **(Rev. Code Wash. § 62A.2-608)**

16 2784. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2785. Plaintiffs identified above demanded revocation and the demands were
19 refused.
20

21 2786. Plaintiffs and the Class had no knowledge of such defects and
22 nonconformities, were unaware of these defects, and reasonably could not have
23 discovered them when they purchased or leased their automobiles from Toyota. On
24 the other hand, Toyota was aware of the defects and nonconformities at the time of
25 sale and thereafter.

26 2787. Acceptance was reasonably induced by the difficulty of discovery of the
27 defects and nonconformities before acceptance.
28

1 2788. There has been no change in the condition of Plaintiffs' vehicles not
2 caused by the defects and nonconformities.

3 2789. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
4 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
5 paid.
6

7 2790. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them.
12

13 2791. These defects and nonconformities substantially impaired the value of
14 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
15 basic sources. First, the Defective Vehicles fail in their essential purpose because
16 they present an unreasonably high risk of sudden unintended acceleration (a risk
17 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
18 Second, the repair and adjust warranty has failed of its essential purpose because
19 Toyota cannot repair or adjust the Defective Vehicles.
20

21 2792. Plaintiffs and the Class provided notice of their intent to seek revocation
22 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
23 (and many Class members) have requested that Toyota accept return of their vehicles
24 and return all payments made. Plaintiffs on behalf of themselves and the Class
25 hereby demand revocation and tender their Defective Vehicles.
26

27 2793. Plaintiffs and the Class would suffer economic hardship if they returned
28 their vehicles but did not receive the return of all payments made by them. Because

1 Toyota is refusing to acknowledge any revocation of acceptance and return
2 immediately any payments made, Plaintiffs and the Class have not re-accepted their
3 Defective Vehicles by retaining them, as they must continue using them due to the
4 financial burden of securing alternative means of transport for an uncertain and
5 substantial period of time.
6

7 2794. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in REV. CODE WASH. § 62A.2-608, for a revocation of acceptance of the goods, and
10 for a return to Plaintiffs and to the Class of the purchase price of all vehicles
11 currently owned.
12

13 2795. Consequently, Plaintiffs and the Class are entitled to revoke their
14 acceptances, receive all payments made to Toyota, and to all incidental and
15 consequential damages, including the costs associated with purchasing safer
16 vehicles, and all other damages allowable under law, all in amounts to be proven at
17 trial.
18

19 **COUNT V**

20 **BREACH OF CONTRACT/Common Law Warranty**

21 **(Based On Washington Law)**

22 2796. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 2797. To the extent Toyota's repair or adjust commitment is deemed not to be
25 a warranty under Washington's Commercial Code, Plaintiffs plead in the alternative
26 under common law warranty and contract law. Toyota limited the remedies available
27 to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in
28

1 materials or workmanship of any part supplied by Toyota, and/or warranted the
2 quality or nature of those services to Plaintiffs.

3 2798. Toyota breached this warranty or contract obligation by failing to repair
4 the Defective Vehicles evidencing a sudden unintended acceleration problem,
5 including those that were recalled, or to replace them.
6

7 2799. As a direct and proximate result of Defendants' breach of contract or
8 common law warranty, Plaintiffs and the Class have been damaged in an amount to
9 be proven at trial, which shall include, but is not limited to, all compensatory
10 damages, incidental and consequential damages, and other damages allowed by law.
11

12 **COUNT VI**
13 **FRAUD BY CONCEALMENT**
14 **(Based On Washington Law)**

15 2800. Plaintiffs reallege and incorporate by reference all paragraphs as though
16 fully set forth herein.

17 2801. As set forth above, Defendants concealed and/or suppressed material
18 facts concerning the safety of their vehicles.

19 2802. Defendants actively concealed and/or suppressed these material facts, in
20 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
21 Defective Vehicles at a higher price for the vehicles, which did not match the
22 vehicles' true value.
23

24 2803. Defendants still have not made full and adequate disclosure and
25 continue to defraud Plaintiffs and the Class.

26 2804. Plaintiffs and the Class were unaware of these omitted material facts
27 and would not have acted as they did if they had known of the concealed and/or
28

1 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
2 in exclusive control of the material facts and such facts were not known to the public
3 or the Class.

4 2805. As a result of the concealment and/or suppression of the facts, Plaintiffs
5 and the Class sustained damage. For those Plaintiffs and the Class who elect to
6 affirm the sale, these damages, include the difference between the actual value of
7 that which Plaintiffs and the Class paid and the actual value of that which they
8 received, together with additional damages arising from the sales transaction,
9 amounts expended in reliance upon the fraud, compensation for loss of use and
10 enjoyment of the property, and/or lost profits. For those Plaintiffs and the Class who
11 want to rescind the purchase, then those Plaintiffs and the Class are entitled to
12 restitution and consequential damages.
13
14

15 2806. Defendants' acts were done maliciously, oppressively, deliberately, with
16 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
17 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
18 punitive damages in an amount sufficient to deter such conduct in the future, which
19 amount is to be determined according to proof.
20

21 **COUNT VII**
22 **UNJUST ENRICHMENT**
23 **(Based On Washington Law)**

24 2807. Plaintiffs reallege and incorporate by reference all paragraphs as though
25 fully set forth herein.

26 2808. Toyota had knowledge of the safety defects in its vehicles, which it
27 failed to disclose to Plaintiffs and the Class.
28

1 2809. As a result of their wrongful and fraudulent acts and omissions, as set
2 forth above, pertaining to the design defect of their vehicles and the concealment of
3 the defect, Toyota charged a higher price for their vehicles than the vehicles' true
4 value and Toyota obtained monies which rightfully belong to Plaintiffs.

5 2810. Toyota appreciated, accepted and retained the non-gratuitous benefits
6 conferred by Plaintiffs and the Class, who without knowledge of the safety defects
7 paid a higher price for vehicles which actually had lower values. It would be
8 inequitable and unjust for Toyota to retain these wrongfully obtained profits.

9 2811. Plaintiffs, therefore, are entitled to restitution and seek an order
10 establishing Toyota as constructive trustees of the profits unjustly obtained, plus
11 interest.
12

13
14 **WEST VIRGINIA**

15 **COUNT I**

16 **VIOLATIONS OF THE CONSUMER CREDIT AND PROTECTION ACT**

17 **(W. Va. Code § 46A-1-101, *et seq.*)**

18 2812. Plaintiffs reallege and incorporate by reference all paragraphs as though
19 fully set forth herein.

20 2813. Defendants are "persons" under W.VA. CODE § 46A-1-102(31).

21 2814. Plaintiffs are "consumers," as defined by W.VA. CODE §§ and 46A-1-
22 102(12) and 46A-6-102(2), who purchased or leased one or more Defective
23 Vehicles.
24

25 2815. Defendants both participated in unfair or deceptive acts or practices that
26 violated the Consumer Credit and Protection Act ("CCPA"), W. VA. CODE § 46A-1-
27 101, *et seq.* as described above and below. Defendants each are directly liable for
28

1 these violations of law. TMC also is liable for TMS's violations of the CCPA
2 because TMS acts as TMC's general agent in the United States for purposes of sales
3 and marketing.

4 2816. By failing to disclose and actively concealing the dangerous risk of
5 throttle control failure and the lack of adequate fail-safe mechanisms in Defective
6 Vehicles equipped with ETCS, Defendants engaged in deceptive business practices
7 prohibited by the CCPA, W. VA. CODE § 46A-1-101, *et seq.*, including
8 (1) representing that Defective Vehicles have characteristics, uses, benefits, and
9 qualities which they do not have, (2) representing that Defective Vehicles are of a
10 particular standard, quality, and grade when they are not, (3) advertising Defective
11 Vehicles with the intent not to sell them as advertised, (4) representing that a
12 transaction involving Defective Vehicles confers or involves rights, remedies, and
13 obligations which it does not, and (5) representing that the subject of a transaction
14 involving Defective Vehicles has been supplied in accordance with a previous
15 representation when it has not.

16 2817. As alleged above, Defendants made numerous material statements about
17 the safety and reliability of Defective Vehicles that were either false or misleading.
18 Each of these statements contributed to the deceptive context of TMC's and TMS's
19 unlawful advertising and representations as a whole.

20 2818. Defendants knew that the ETCS in Defective Vehicles was defectively
21 designed or manufactured, would fail without warning, and was not suitable for its
22 intended use of regulating throttle position and vehicle speed based on driver
23 commands. Defendants nevertheless failed to warn Plaintiffs about these inherent
24 dangers despite having a duty to do so.

1 2819. Defendants each owed Plaintiffs a duty to disclose the defective nature
2 of Defective Vehicles, including the dangerous risk of throttle control failure, the
3 ETCS defects, and the lack of adequate fail-safe mechanisms, because they:

4 a. Possessed exclusive knowledge of the defects rendering
5 Defective Vehicles inherently more dangerous and unreliable than similar vehicles;
6

7 b. Intentionally concealed the hazardous situation with Defective
8 Vehicles through their deceptive marketing campaign and recall program that they
9 designed to hide the life-threatening problems from Plaintiffs; and/or

10 c. Made incomplete representations about the safety and reliability
11 of Defective Vehicles generally, and ETCS in particular, while purposefully
12 withholding material facts from Plaintiffs that contradicted these representations.
13

14 2820. Defective Vehicles equipped with ETCS pose an unreasonable risk of
15 death or serious bodily injury to Plaintiffs, passengers, other motorists, pedestrians,
16 and the public at large, because they are susceptible to incidents of sudden
17 unintended acceleration.

18 2821. Whether or not a vehicle (a) accelerates only when commanded to do so
19 and (b) decelerates and stops when commanded to do so are facts that a reasonable
20 consumer would consider important in selecting a vehicle to purchase or lease. When
21 Plaintiffs bought a Toyota Vehicle for personal, family, or household purposes, they
22 reasonably expected the vehicle would (a) not accelerate unless commanded to do so
23 by application of the accelerator pedal or other driver controlled means; (b)
24 decelerate to a stop when the brake pedal was applied, and was equipped with any
25 necessary fail-safe mechanisms including a brake-override.
26
27
28

1 2822. TMC's and TMS's unfair or deceptive acts or practices were likely to
2 deceive reasonable consumers, including Plaintiffs, about the true safety and
3 reliability of Defective Vehicles.

4 2823. Defendants have also engaged in business acts or practices that are
5 unlawful because they violate the National Traffic and Motor Vehicle Safety Act of
6 1996 (the "Safety Act"), codified at 49 U.S.C. § 30101, *et seq.*, and its regulations.

7 2824. FMVSS 124, codified at 49 C.F.R. § 571.124, sets the standard for
8 accelerator control systems. Specifically, FMVSS 124 establishes requirements for
9 the return of a vehicle's throttle to the idle position when the driver removes the
10 actuating force from the accelerator control, or in the event of a severance or
11 disconnection in the accelerator control system. The purpose of FMVSS 124 is to
12 reduce deaths and injuries resulting from engine overspeed caused by malfunctions
13 in the accelerator control system.

14 2825. FMVSS 124 requires that throttles in passenger vehicles return to the
15 idle position within certain maximum allowable times after the driver has removed
16 the actuating force from the accelerator control: one second for vehicles of 4,536
17 kilograms or less gross vehicle weight rating ("GVWR"), two seconds for vehicles of
18 more than 4,536 kilograms GVWR, and three seconds for any vehicle that is exposed
19 to ambient air at – 18 degrees Celsius to – 40 degrees Celsius.

20 2826. Defective Vehicles equipped with ETCS do not comply with FMVSS
21 124 because a design defect causes their throttles to be susceptible to remaining in an
22 open position and incapable of returning to the idle position within the maximum
23 allowable time after the driver has removed the actuating force from the accelerator
24 control.

1 2827. Defendants each violated 49 U.S.C. § 3-112(a)(1) by manufacturing for
2 sale, selling, offering for introduction in interstate commerce, or importing into the
3 United States, Defective Vehicles equipped with ETCS that failed to comply with
4 FMVSS 124.

5 2828. Defendants each violated 49 U.S.C. § 30115(a) by certifying that
6 Defective Vehicles equipped with ETCS complied with FMVSS 124 when, in the
7 exercise of reasonable care, Defendants each had reason to know that the
8 certification was false or misleading because a design defect causes throttles in
9 Defective Vehicles equipped with ETCS to be susceptible to remaining in an open
10 position and incapable of returning to the idle position within the maximum
11 allowable time after the driver has removed the actuating force from the accelerator
12 control.
13

14 2829. As a result of its violations of the CCPA detailed above, Defendants
15 caused ascertainable loss to Plaintiffs and, if not stopped, will continue to harm
16 Plaintiffs. Plaintiffs currently own or lease, or within the class period have owned or
17 leased, Defective Vehicles that are defective and inherently unsafe. ETCS defects
18 and the resulting unintended acceleration incidents have caused the value of
19 Defective Vehicles to plummet.
20

21 2830. Plaintiffs risk irreparable injury as a result of TMC's and TMS's acts
22 and omissions in violation of the CCPA, and these violations present a continuing
23 risk to Plaintiffs as well as to the general public.
24

25 2831. On November 13, 2009, notice was sent to TMS in compliance with
26 W. VA. CODE § 46A-6-106. Specifically, Plaintiffs sent a notice and demand letter
27 via certified mail to TMS's principal place of business in California, thereby
28

1 satisfying W. VA. CODE § 46A-1-106(b). On or about November 20, 2009, a notice
2 and demand letter was set via certified mail to TMC's address in Washington, DC,
3 where TMC acted with its United States subsidiaries to take actions violating the
4 CCPA, and where TMC otherwise acted in violation of that statute. Over twenty
5 days have since passed without TMS or TMC taking, or agreeing to take, the
6 appropriate corrective measures.
7

8 2832. Pursuant to W. VA. CODE § 46A-1-106, Plaintiffs seek monetary relief
9 against TMS and TMC measured as the greater of (a) actual damages in an amount
10 to be determined at trial and (b) statutory damages in the amount of \$200 per
11 violation of the CCPA for each Plaintiff and each member of the Class they seek to
12 represent.
13

14 2833. Plaintiffs also seek punitive damages against Defendants because each
15 carried out despicable conduct with willful and conscious disregard of the rights and
16 safety of others, subjecting Plaintiffs to cruel and unjust hardship as a result.
17 Defendants intentionally and willfully misrepresented the safety and reliability of
18 Defective Vehicles, deceived Plaintiffs on life-or-death matters, and concealed
19 material facts that only it knew, all to avoid the expense and public relations
20 nightmare of correcting a deadly flaw in the Defective Vehicles it repeatedly
21 promised Plaintiffs were safe. Defendants' unlawful conduct constitutes malice,
22 oppression, and fraud warranting punitive damages.
23

24 2834. The recalls and repairs instituted by Toyota have not been adequate.
25 Defective Vehicles still are defective and the "confidence" booster offer of an
26 override is not an effective remedy and is not offered to all Defective Vehicles,
27 including the 2002-2007 Camry.
28

1 2835. Plaintiffs further seek an order enjoining Defendants' unfair or
2 deceptive acts or practices, restitution, punitive damages, costs of Court, attorney's
3 fees under W. VA. CODE § 46A-5-101, *et seq.*, and any other just and proper relief
4 available under the CCPA.

5
6 **COUNT II**
7 **BREACH OF EXPRESS WARRANTY**
8 **(W. Va. Code § 46-2-313)**

9 2836. Plaintiffs reallege and incorporate by reference all paragraphs as though
10 fully set forth herein.

11 2837. Toyota is and was at all relevant times a seller of motor vehicles under
12 W. VA. CODE § 46-2-313, and is also a "merchant" as the term is used in W. VA.
13 CODE § 46A-6-107.

14 2838. In the course of selling its vehicles, Toyota expressly warranted in
15 writing that the Vehicles were covered by a Basic Warranty.

16 2839. Toyota breached the express warranty to repair and adjust to correct
17 defects in materials and workmanship of any part supplied by Toyota. Toyota has
18 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
19 materials and workmanship defects.

20 2840. In addition to this Basic Warranty, Toyota expressly warranted several
21 attributes, characteristics and qualities, as set forth above.

22 2841. These warranties are only a sampling of the numerous warranties that
23 Toyota made relating to safety, reliability and operation, which are more fully
24 outlined in Section IV.A., *supra*. Generally these express warranties promise
25 heightened, superior, and state-of-the-art safety, reliability, performance standards,
26
27
28

1 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
2 advertisements, in Toyota's "e brochures," and in uniform statements provided by
3 Toyota to be made by salespeople. These affirmations and promises were part of the
4 basis of the bargain between the parties.

5
6 2842. These additional warranties were also breached because the Defective
7 Vehicles were not fully operational, safe, or reliable (and remained so even after the
8 problems were acknowledged and a recall "fix" was announced), nor did they
9 comply with the warranties expressly made to purchasers or lessees. Toyota did not
10 provide at the time of sale, and has not provided since then, vehicles conforming to
11 these express warranties.

12
13 2843. Furthermore, the limited warranty of repair and/or adjustments to
14 defective parts, fails in its essential purpose because the contractual remedy is
15 insufficient to make the Plaintiffs and the Class whole and because the Defendants
16 have failed and/or have refused to adequately provide the promised remedies within
17 a reasonable time.

18
19 2844. Accordingly, recovery by the Plaintiffs is not limited to the limited
20 warranty of repair or adjustments to parts defective in materials or workmanship, and
21 Plaintiffs seek all remedies as allowed by law.

22 2845. Also, as alleged in more detail herein, at the time that Defendants
23 warranted and sold the vehicles they knew that the vehicles did not conform to the
24 warranties and were inherently defective, and Defendants wrongfully and
25 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
26 Plaintiffs were therefore induced to purchase the vehicles under false and/or
27 fraudulent pretenses. The enforcement under these circumstances of any limitations
28

1 whatsoever precluding the recovery of incidental and/or consequential damages is
2 unenforceable.

3 2846. Additionally, the enforcement under these circumstances of any
4 limitations on the recovery of incidental and/or consequential damages, or indeed
5 any limitations whatsoever on any express warranty, is unenforceable pursuant to
6 W. VA. CODE § 46A-6-107 (2).
7

8 2847. Moreover, many of the damages flowing from the Defective Vehicles
9 cannot be resolved through the limited remedy of “replacement or adjustments,” as
10 those incidental and consequential damages have already been suffered due to
11 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
12 continued failure to provide such limited remedy within a reasonable time, and any
13 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
14 Plaintiffs and the Class whole.
15

16 2848. Finally, due to the Defendants’ breach of warranties as set forth herein,
17 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
18 in W. VA. CODE § 46A-6A-4, for a revocation of acceptance of the goods, and for a
19 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
20 owned and for such other incidental and consequential damages as allowed under W.
21 VA. CODE § 46A-6A-1, *et seq.*
22

23 2849. Toyota was provided notice of these issues by numerous complaints
24 filed against it, including the instant complaint, and by numerous individual letters
25 and communications sent by Plaintiffs and the Class before or within a reasonable
26 amount of time after Toyota issued the recall and the allegations of vehicle defects
27 became public.
28

2850. As a direct and proximate result of Toyota's breach of express warranties, Plaintiffs and the Class have been damaged in an amount to be determined at trial.

COUNT III
BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY
(W. Va. Code § 46-2-314)

2851. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2852. Toyota is and was at all relevant times a seller of motor vehicles under W. VA. CODE § 46-2-314, and is also a “merchant” as the term is used in W. VA. CODE § 46A-6-107 and § 46-2-314.

2853. A warranty that the Defective Vehicles were in merchantable condition was implied by law in the instant transaction, pursuant to W. VA. CODE § 46-2-314.

2854. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against such SUA events, nor do they have a brake-override; and the ETCS system was not adequately tested.

2855. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable

1 amount of time after Toyota issued the recall and the allegations of vehicle defects
2 became public.

3 2856. Plaintiffs and the Class have had sufficient direct dealings with either
4 the Defendants or their agents (dealerships) to establish privity of contract between
5 Plaintiffs and Toyota. Notwithstanding this, privity is not required in this case for
6 the Plaintiffs pursuant to W. VA. CODE § 46A-6-107. Moreover, privity is not
7 required as to any Plaintiff because Plaintiffs and the Class are intended third-party
8 beneficiaries of contracts between Toyota and its dealers; specifically, they are the
9 intended beneficiaries of Toyota's implied warranties. The dealers were not
10 intended to be the ultimate consumers of the Defective Vehicles and have no rights
11 under the warranty agreements provided with the Defective Vehicles; the warranty
12 agreements were designed for and intended to benefit the ultimate users or owners
13 only. Finally, privity is also not required because Plaintiffs' and Class members'
14 Toyotas are dangerous instrumentalities due to the aforementioned defects and
15 nonconformities.

16 2857. As a direct and proximate result of Toyota's breach of the warranties of
17 merchantability, Plaintiffs and the Class have been damaged in an amount to be
18 proven at trial.

19
20
21
22 **COUNT IV**

23 **REVOCATION OF ACCEPTANCE/STATUTORY CLAIM**
24 **FOR DIMINISHED VALUE**

25 **(W. Va. Code § 46A-6A-1, *et seq.* and W. Va. Code § 46-2-608)**

26 2858. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.

1 2859. Plaintiffs are “consumers,” as defined by W.VA. CODE §§ 46A-1-
2 102(12), 46A-6-102(2) and 46A-6A-2 who purchased or leased one or more
3 Defective Vehicles.

4 2860. Toyota is and was at all relevant times a “manufacturer” of motor
5 vehicles under W. VA. CODE § 46A-6A-2.

6 2861. The warranties described in Count III, above, are “manufacturer’s
7 express warrant[ies]” under W. VA. CODE § 46A-6A-2.

8 2862. The Defective Vehicles are “motor vehicles” under W. VA. CODE
9 § 46A-6A-2.

10 2863. As set forth above, the defective vehicles do not conform to all
11 applicable express warranties.

12 2864. Toyota was provided notice of these nonconformities by numerous
13 complaints filed against it, including the instant complaint, and by numerous
14 individual letters and communications sent by Plaintiffs and the Class before or
15 within a reasonable amount of time after Toyota issued the recall and the allegations
16 of vehicle defects became public.

17 2865. Toyota has been unable or unwilling to repair the Defective Vehicles so
18 as to conform to the Defective Vehicles to its warranties. Additionally, Toyota has
19 refused to replace the Defective Vehicles with new motor vehicles which are not
20 defective.

21 2866. The nonconformities set forth above, above, substantially impair the use
22 and market value of the Defective Vehicles, and Defective Vehicles equipped with
23 ETCS present a condition likely to death or serious bodily injury to Plaintiffs,
24

1 passengers, other motorists, pedestrians, and the public at large, because they are
2 susceptible to incidents of sudden unintended acceleration, if the vehicles are driven.

3 2867. As to the Defective Vehicles which were subject to one or both of the
4 “floor mat” or “sticky pedal” recalls, Toyota had at least one opportunity to conform
5 the Defective Vehicles to the express warranties, but failed to do so.
6

7 2868. Pursuant to W. VA. CODE § 46A-6A-4, Plaintiffs seek: (a) revocation of
8 acceptance and refund of the vehicle purchase price and all fees paid, (b) in the
9 alternative to revocation of acceptance, damages for diminished value of the
10 Defective Vehicles, (c) damages in the amount of the cost to repair the vehicle so
11 that it conforms to the warranties, (d) damages for loss of use and annoyance and
12 inconvenience, and (e) attorney fees.
13

14 2869. As of the time of the filing of this pleading, Toyota has been aware for
15 nearly a year of the breach of warranty claims under this statute alleged by West
16 Virginians who purchased or leased Defective vehicles. Indeed, Toyota has filed a
17 motion to dismiss the putative class action filed in the United States District Court
18 for the Southern District of West Virginia, which alleged such claims, among other
19 things. Nevertheless, Toyota has never insisted, or even mentioned, in writing any
20 “third party dispute resolution process” as contemplated by W. VA. CODE § 46A-6A-
21 8. As such, under W. VA. CODE § 46A-6A-8(b), even if any “qualified third party
22 dispute resolution process” exists (which Plaintiffs deny), the Plaintiffs have not
23 received, and could not now receive, timely notice in writing of such a procedure,
24 and they have no obligation to submit to such a procedure before bringing a claim
25 pursuant to W. VA. CODE § 46A-6A-4.
26
27
28

COUNT V

UNJUST ENRICHMENT

(Based On West Virginia Law)

2870. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2871. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Defendants charged a higher price for their vehicles than the vehicles' true value and Defendants obtained monies which rightfully belong to Plaintiffs.

2872. Defendants knowingly enjoyed the benefit of increased financial gains, to the detriment of Plaintiffs and the Class, who paid a higher price for vehicles which actually had lower values. It would be inequitable and unjust for Defendants to retain these wrongfully obtained profits.

2873. Plaintiffs, therefore, are entitled to restitution and seek and order establishing Toyota as constructive trustees of the profits unjustly obtained, plus interest.

COUNT VI

**BREACH OF CONTRACT/COMMON LAW WARRANTY/BREACH
OF DUTY OF GOOD FAITH AND FAIR DEALING**

(Based On West Virginia Law)

2874. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2875. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under West Virginia's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the

1 remedies available to Plaintiffs and the Class to just repairs and adjustments needed
2 to correct defects in materials or workmanship of any part supplied by Toyota,
3 and/or warranted the quality or nature of those services to Plaintiffs.

4 2876. Toyota breached this warranty or contract obligation by failing to repair
5 the Defective Vehicles evidencing a sudden unintended acceleration problem,
6 including those that were recalled, or to replace them.

8 2877. Moreover all contracts in West Virginia carry with them an implied
9 duty of good faith and fair dealing. Toyota breached that duty by failing to repair the
10 Defective Vehicles evidencing a sudden unintended acceleration problem, including
11 those that were recalled, or the replace them, and in other ways.

12 2878. As a direct and proximate result of Defendants' breach of contract or
13 common law warranty, Plaintiffs and the Class have been damaged in an amount to
14 be proven at trial, which shall include, but is not limited to, all compensatory
15 damages, incidental and consequential damages, and other damages allowed by law.

17 **WISCONSIN**

18 **COUNT I**

19 **VIOLATIONS OF THE WISCONSIN**
20 **DECEPTIVE TRADE PRACTICES ACT**

21 **(Wisc. Stat. § 110.18)**

22 2879. Plaintiffs reallege and incorporate by reference all paragraphs as though
23 fully set forth herein.

24 2880. Defendants' above-described acts and omissions constitute false,
25 misleading or deceptive acts or practices under the Wisconsin Deceptive Trade
26 Practices Act § 110.18 ("Wisconsin DTPA").
27
28

1 2881. By failing to disclose and misrepresenting the risk of throttle control
2 failure and adequacy of fail-safe mechanisms in Defective Vehicles equipped with
3 ETCS, Defendants engaged in deceptive business practices prohibited by the
4 Wisconsin DTPA, including (1) representing that Defective Vehicles have
5 characteristics, uses, benefits, and qualities which they do not have, (2) representing
6 that Defective Vehicles are of a particular standard, quality, and grade when they are
7 not, (3) advertising Defective Vehicles with the intent not to sell them as advertised,
8 (4) representing that a transaction involving Defective Vehicles confers or involves
9 rights, remedies, and obligations which it does not, and (5) representing that the
10 subject of a transaction involving Defective Vehicles has been supplied in
11 accordance with a previous representation when it has not.
12

13
14 2882. As alleged above, Defendants made numerous material statements about
15 the safety and reliability of Defective Vehicles that were either false or misleading.
16 Each of these statements contributed to the deceptive context of TMC's and TMS's
17 unlawful advertising and representations as a whole.
18

19 2883. TMC's and TMS's unfair or deceptive acts or practices were likely to
20 and did in fact deceive reasonable consumers, including Plaintiffs, about the true
21 safety and reliability of Defective Vehicles.

22 2884. In purchasing or leasing their vehicles, the Plaintiffs relied on the
23 misrepresentations and/or omissions of Toyota with respect of the safety and
24 reliability of the vehicles. Toyota's representations turned out not to be true because
25 the vehicles can unexpectedly and dangerously accelerate out of the drivers' control.
26 Had the Plaintiffs known this they would not have purchased or leased their
27 Defective Vehicles and/or paid as much for them.
28

2885. Plaintiffs and the Class sustained damages as a result of the Defendants unlawful acts and are, therefore, entitled to damages and other relief provided for under § 110.18(11)(b)(2) of the Wisconsin DTPA. Because Defendants' conduct was committed knowingly and/or intentionally, the Plaintiffs and the Class are entitled to treble damages.

2886. Plaintiffs and the Class also seek court costs and attorneys' fees under § 110.18(11)(b)(2) of the Wisconsin DTPA.

COUNT II_
BREACH OF EXPRESS WARRANTY
(Wisc. Stat. § 402.313)

2887. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2888. Toyota is and was at all relevant times a merchant with respect to motor vehicles under WISC. STAT. § 402.104.

2889. In the course of selling its vehicles, Toyota expressly warranted in writing that the Vehicles were covered by a Basic Warranty.

2890. Toyota breached the express warranty to repair and adjust to correct defects in materials and workmanship of any part supplied by Toyota. Toyota has not repaired or adjusted, and has been unable to repair or adjust, the Vehicles' materials and workmanship defects.

2891. In addition to this Basic Warranty, Toyota expressly warranted several attributes, characteristics and qualities, as set forth above.

2892. These warranties are only a sampling of the numerous warranties that Toyota made relating to safety, reliability and operation, which are more fully

1 outlined in Section IV.A., *supra*. Generally these express warranties promise
2 heightened, superior, and state-of-the-art safety, reliability, performance standards,
3 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
4 advertisements, in Toyota's "e-brochures," and in uniform statements provided by
5 Toyota to be made by salespeople. These affirmations and promises were part of the
6 basis of the bargain between the parties.
7

8 2893. These additional warranties were also breached because the Defective
9 Vehicles were not fully operational, safe, or reliable (and remained so even after the
10 problems were acknowledged and a recall "fix" was announced), nor did they
11 comply with the warranties expressly made to purchasers or lessees. Toyota did not
12 provide at the time of sale, and has not provided since then, vehicles conforming to
13 these express warranties.
14

15 2894. Furthermore, the limited warranty of repair and/or adjustments to
16 defective parts, fails in its essential purpose because the contractual remedy is
17 insufficient to make the Plaintiffs and the Class whole and because the Defendants
18 have failed and/or have refused to adequately provide the promised remedies within
19 a reasonable time.
20

21 2895. Accordingly, recovery by the Plaintiffs is not limited to the limited
22 warranty of repair or adjustments to parts defective in materials or workmanship, and
23 Plaintiffs seek all remedies as allowed by law.

24 2896. Also, as alleged in more detail herein, at the time that Defendants
25 warranted and sold the vehicles they knew that the vehicles did not conform to the
26 warranties and were inherently defective, and Defendants wrongfully and
27 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
28

1 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
2 and/or fraudulent pretenses. The enforcement under these circumstances of any
3 limitations whatsoever precluding the recovery of incidental and/or consequential
4 damages is unenforceable.

5
6 2897. Moreover, many of the damages flowing from the Defective Vehicles
7 cannot be resolved through the limited remedy of “replacement or adjustments,” as
8 those incidental and consequential damages have already been suffered due to
9 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
10 continued failure to provide such limited remedy within a reasonable time, and any
11 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
12 Plaintiffs and the Class whole.

13
14 2898. Plaintiffs and the Class had sufficient direct dealings with the
15 Defendants to establish privity of contract between Plaintiffs and the Class.
16 Notwithstanding this, privity is not required in this case because Plaintiffs and Class
17 are intended third-party beneficiaries of contracts between Toyota and its dealers;
18 specifically, they are the intended beneficiaries of Toyota’s warranties. The dealers
19 were not intended to be the ultimate consumers of the Defective Vehicles and have
20 no rights under the warranty agreements provided with the Defective Vehicles; the
21 warranty agreements were designed for and intended to benefit the ultimate
22 consumers only.

23
24 2899. Finally, due to the Defendants’ breach of warranties as set forth herein,
25 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
26 in WISC. STAT. § 402.608, for a revocation of acceptance of the goods, and for a
27 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
28

1 owned and for such other incidental and consequential damages as allowed under
2 Wisc. Stat. §§ 402.711 and 402.608.

3 2900. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 2901. As a direct and proximate result of Toyota's breach of express
10 warranties, Plaintiffs and the Class have been damaged in an amount to be
11 determined at trial.
12

13 **COUNT III**
14 **REVOCATION OF ACCEPTANCE**
15 **(Wisc. Stat § 402.608)**

16 2902. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2903. Plaintiffs identified above demanded revocation and their demands were
19 refused.

20 2904. Plaintiffs and the Class had no knowledge of such defects and
21 nonconformities, were unaware of these defects, and reasonably could not have
22 discovered them when they purchased or leased their automobiles from Toyota. On
23 the other hand, Toyota was aware of the defects and nonconformities at the time of
24 sale and thereafter.
25

26 2905. Acceptance was reasonably induced by the difficulty of discovery of the
27 defects and nonconformities before acceptance.
28

1 2906. There has been no change in the condition of Plaintiffs' vehicles not
2 caused by the defects and nonconformities.

3 2907. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
4 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
5 paid.
6

7 2908. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them.
12

13 2909. These defects and nonconformities substantially impaired the value of
14 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
15 basic sources. First, the Defective Vehicles fail in their essential purpose because
16 they present an unreasonably high risk of sudden unintended acceleration (a risk
17 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
18 Second, the repair and adjust warranty has failed of its essential purpose because
19 Toyota cannot repair or adjust the Defective Vehicles.
20

21 2910. Plaintiffs and the Class provided notice of their intent to seek revocation
22 of acceptance by a class-action lawsuit seeking such relief. In addition, Plaintiffs
23 (and many Class members) have requested that Toyota accept return of their vehicles
24 and return all payments made. Plaintiffs on behalf of themselves and the Class
25 hereby demand revocation and tender their Defective Vehicles.
26

27 2911. Plaintiffs and the Class would suffer economic hardship if they returned
28 their vehicles but did not receive the return of all payments made by them. Because

1 Toyota is refusing to acknowledge any revocation of acceptance and return
2 immediately any payments made, Plaintiffs and the Class have not re-accepted their
3 Defective Vehicles by retaining them, as they must continue using them due to the
4 financial burden of securing alternative means of transport for an uncertain and
5 substantial period of time.
6

7 2912. Finally, due to the Defendants' breach of warranties as set forth herein,
8 Plaintiffs and the Class assert as an additional and/or alternative remedy, as set forth
9 in WISC. STAT. § 402.711, for a revocation of acceptance of the goods, and for a
10 return to Plaintiffs and to the Class of the purchase price of all vehicles currently
11 owned and for such other incidental and consequential damages as allowed under
12 WISC. STAT. § 402.711.
13

14 2913. Consequently, Plaintiffs and the Class are entitled to revoke their
15 acceptances, receive all payments made to Toyota, and to all incidental and
16 consequential damages, including the costs associated with purchasing safer
17 vehicles, and all other damages allowable under law, all in amounts to be proven at
18 trial.
19

20 **COUNT IV**
21 **BREACH OF CONTRACT/COMMON LAW WARRANTY**
22 **(Based On Wisconsin Law)**

23 2914. Plaintiffs incorporate by reference and reallege all paragraphs alleged
24 herein.

25 2915. To the extent Toyota's repair or adjust commitment is deemed not to be
26 a warranty under the Uniform Commercial Code as adopted in Wisconsin, Plaintiffs
27 plead in the alternative under common law warranty and contract law. Toyota
28

1 limited the remedies available to Plaintiffs and the Class to just repairs and
2 adjustments needed to correct defects in materials or workmanship of any part
3 supplied by Toyota, and/or warranted the quality or nature of those services to
4 Plaintiffs.

5
6 2916. Toyota breached this warranty or contract obligation by failing to repair
7 the Defective Vehicles evidencing a sudden unintended acceleration problem,
8 including those that were recalled, or to replace them.

9
10 2917. As a direct and proximate result of Defendants' breach of contract or
11 common law warranty, Plaintiffs and the Class have been damaged in an amount to
12 be proven at trial, which shall include, but is not limited to, all compensatory
13 damages, incidental and consequential damages, and other damages allowed by law.

14 **COUNT V**
15 **FRAUD BY CONCEALMENT**
16 **(Based On Wisconsin Law)**

17 2918. Plaintiffs reallege and incorporate by reference all paragraphs as though
18 fully set forth herein.

19 2919. As set forth above, Defendants concealed and/or suppressed material
20 facts concerning the safety of their vehicles.

21
22 2920. Defendants had a duty to disclose these safety issues because they
23 consistently marketed their vehicles as safe and proclaimed that safety is one of
24 Toyota's highest corporate priorities. Once Defendants made representations to the
25 public about safety, Defendants were under a duty to disclose these omitted facts,
26 because where one does speak one must speak the whole truth and not conceal any
27
28

1 facts which materially qualify those facts stated. One who volunteers information
2 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

3 2921. In addition, Defendants had a duty to disclose these omitted material
4 facts because they were known and/or accessible only to Defendants who have
5 superior knowledge and access to the facts, and Defendants knew they were not
6 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
7 were material because they directly impact the safety of the Defective Vehicles.
8 Whether or not a vehicle accelerates only at the driver's command, and whether a
9 vehicle will stop or not upon application of the brake by the driver, are material
10 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
11 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.
12

13 2922. Defendants actively concealed and/or suppressed these material facts, in
14 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
15 Defective Vehicles at a higher price for the vehicles, which did not match the
16 vehicles' true value.
17

18 2923. Defendants still have not made full and adequate disclosure and
19 continue to defraud Plaintiffs and the Class.
20

21 2924. Plaintiffs and the Class were unaware of these omitted material facts
22 and would not have acted as they did if they had known of the concealed and/or
23 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
24 in exclusive control of the material facts and such facts were not known to the public
25 or the Class.
26

27 2925. As a result of the concealment and/or suppression of the facts, Plaintiffs
28 and the Class sustained damage.

COUNT VI
UNJUST ENRICHMENT
(Based On Wisconsin Law)

2928. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Defendants charged a higher price for their vehicles than the vehicles' true value and Defendants obtained monies which rightfully belong to Plaintiffs.

2930. Plaintiffs, therefore, seek an order establishing Defendants as constructive trustees of the profits unjustly obtained, plus interest.

WYOMING
COUNT I
VIOLATION OF THE WYOMING CONSUMER PROTECTION ACT
(Wyo. Stat. §§ 45-12-105 *et seq.*)

2931. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2932. The Wyoming Consumer Protection Act describes that a person engages in a deceptive trade practice under this act when, in the course of his business and in connection with a consumer transaction he knowingly does one or more of the following, including: “(iii) Represents that merchandise is of a particular standard, grade, style or model, if it is not”; “(v) Represents that merchandise has been supplied in accordance with a previous representation, if it has not...”; “(viii) Represents that a consumer transaction involves a warranty, a disclaimer of warranties, particular warranty terms, or other rights, remedies or obligations if the representation is false”; “(x) Advertises merchandise with intent not to sell it as advertised”; and “(xv) Engages in unfair or deceptive acts or practices.” WYO. STAT. § 45-12-105.

2933. In the course of Toyota’s business, it willfully failed to disclose and actively concealed the dangerous risk of throttle control failure and the lack of adequate fail-safe mechanisms in Defective Vehicles equipped with ETCS as described above. Accordingly, Toyota engaged in deceptive trade practices, including representing that Defective Vehicles are of a particular standard and grade, which they are not; representing that Defective Vehicles have been supplied with a previous representation when they are not; advertising Defective Vehicles with the

1 intent not to sell them as advertised; representing that its transaction involves a
2 warranty, rights, remedies, or obligations that are false; and overall engaging in
3 unfair and deceptive acts or practices.

4 2934. Toyota knowingly made false representations to consumers with the
5 intent to induce consumers into purchasing Toyota vehicles. Plaintiffs reasonably
6 relied on false representations by Toyota and were induced to each purchase a
7 Toyota vehicle, to his/her detriment. As a result of these unlawful trade practices,
8 Plaintiffs have suffered ascertainable loss.
9

10 2935. Plaintiffs and the Class suffered ascertainable loss caused by Toyota's
11 false representations and failure to disclose material information. Plaintiffs and the
12 Class overpaid for their vehicles and did not receive the benefit of their bargain. The
13 value of their Toyota's has diminished now that the safety issues have come to light,
14 and Plaintiffs and the Class own vehicles that are not safe.
15

16 2936. Toyota is a "person" as required under the statute.

17 2937. Toyota's actions as set forth above occurred in the course of business
18 and in connection with a consumer transaction.
19

20 2938. As required under the Wyoming Consumer Protection Act, a notice
21 letter was sent on behalf of the class in connection with the case: *Gureski v. Toyota*
22 *Motor North America, Inc., et al.*; Case No. 10-cv-00031.

23 **COUNT II**

24 **BREACH OF EXPRESS WARRANTY**

25 **(Wyo. Stat. § 34.1-2-313)**

26 2939. Plaintiffs reallege and incorporate by reference all paragraphs as though
27 fully set forth herein.
28

1 2940. Toyota is and was at all relevant times a merchant with respect to motor
2 vehicles under the Uniform Commercial Code.

3 2941. In the course of selling its vehicles, Toyota expressly warranted in
4 writing that the Vehicles were covered by a Basic Warranty.

5 2942. Toyota breached the express warranty to repair and adjust to correct
6 defects in materials and workmanship of any part supplied by Toyota. Toyota has
7 not repaired or adjusted, and has been unable to repair or adjust, the Vehicles'
8 materials and workmanship defects.

9
10 2943. In addition to this Basic Warranty, Toyota expressly warranted several
11 attributes, characteristics and qualities, as set forth above.

12
13 2944. These warranties are only a sampling of the numerous warranties that
14 Toyota made relating to safety, reliability and operation, which are more fully
15 outlined in Section IV.A., *supra*. Generally these express warranties promise
16 heightened, superior, and state-of-the-art safety, reliability, performance standards,
17 and promote the benefits of ETCS. These warranties were made, *inter alia*, in
18 advertisements, in Toyota's "e brochures," and in uniform statements provided by
19 Toyota to be made by salespeople. These affirmations and promises were part of the
20 basis of the bargain between the parties.

21
22 2945. These additional warranties were also breached because the Defective
23 Vehicles were not fully operational, safe, or reliable (and remained so even after the
24 problems were acknowledged and a recall "fix" was announced), nor did they
25 comply with the warranties expressly made to purchasers or lessees. Toyota did not
26 provide at the time of sale, and has not provided since then, vehicles conforming to
27 these express warranties.

1 2946. Furthermore, the limited warranty of repair and/or adjustments to
2 defective parts, fails in its essential purpose because the contractual remedy is
3 insufficient to make the Plaintiffs and the Class whole and because the Defendants
4 have failed and/or have refused to adequately provide the promised remedies within
5 a reasonable time.
6

7 2947. Accordingly, recovery by the Plaintiffs is not limited to the limited
8 warranty of repair or adjustments to parts defective in materials or workmanship, and
9 Plaintiffs seek all remedies as allowed by law.

10 2948. Also, as alleged in more detail herein, at the time that Defendants
11 warranted and sold the vehicles they knew that the vehicles did not conform to the
12 warranties and were inherently defective, and Defendants wrongfully and
13 fraudulently misrepresented and/or concealed material facts regarding their vehicles.
14 Plaintiffs and the Class were therefore induced to purchase the vehicles under false
15 and/or fraudulent pretenses. The enforcement under these circumstances of any
16 limitations whatsoever precluding the recovery of incidental and/or consequential
17 damages is unenforceable.
18

19 2949. Moreover, many of the damages flowing from the Defective Vehicles
20 cannot be resolved through the limited remedy of “replacement or adjustments,” as
21 those incidental and consequential damages have already been suffered due to
22 Defendants’ fraudulent conduct as alleged herein, and due to their failure and/or
23 continued failure to provide such limited remedy within a reasonable time, and any
24 limitation on Plaintiffs’ and the Class’ remedies would be insufficient to make
25 Plaintiffs and the Class whole.
26
27
28

2950. Toyota was provided notice of these issues by numerous complaints filed against it, including the instant complaint, and by numerous individual letters and communications sent by Plaintiffs and the Class before or within a reasonable amount of time after Toyota issued the recall and the allegations of vehicle defects became public.

2951. As a direct and proximate result of Toyota's breach of express warranties, Plaintiffs and the Class have been damaged in an amount to be determined at trial.

COUNT III
BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY
(Wyo. Stat. §§ 34.1-2-314)

2952. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2953. Toyota is and was at all relevant times a merchant with respect to motor vehicles under the Uniform Commercial Code.

2954. A warranty that the Defective Vehicles were in merchantable condition was implied by law in the instant transaction, pursuant to the Uniform Commercial Code.

2955. These vehicles, when sold and at all times thereafter, were not in merchantable condition and are not fit for the ordinary purpose for which cars are used. Specifically, the Defective Vehicles are inherently defective in that there are defects in the vehicle control systems that permit sudden unintended acceleration to occur; the Defective Vehicles do not have an adequate fail-safe to protect against

1 such SUA events, nor do they have a brake-override; and the ETCS system was not
2 adequately tested.

3 2956. Toyota was provided notice of these issues by numerous complaints
4 filed against it, including the instant complaint, and by numerous individual letters
5 and communications sent by Plaintiffs and the Class before or within a reasonable
6 amount of time after Toyota issued the recall and the allegations of vehicle defects
7 became public.
8

9 2957. As a direct and proximate result of Toyota's breach of the warranties of
10 merchantability, Plaintiffs and the Class have been damaged in an amount to be
11 proven at trial.
12

13 **COUNT IV**
14 **REVOCATION OF ACCEPTANCE IN WHOLE OR IN PART**
15 **(Wyo. Stat. § 34.1-2-608)**

16 2958. Plaintiffs reallege and incorporate by reference all paragraphs as though
17 fully set forth herein.

18 2959. Plaintiffs identified above demanded revocation and the demands were
19 refused.
20

21 2960. Plaintiffs and the Class had no knowledge of such defects and
22 nonconformities, were unaware of these defects, and reasonably could not have
23 discovered them when they purchased or leased their automobiles from Toyota. On
24 the other hand, Toyota was aware of the defects and nonconformities at the time of
25 sale and thereafter.

26 2961. Acceptance was reasonably induced by the difficulty of discovery of the
27 defects and nonconformities before acceptance.
28

1 2962. There has been no change in the condition of Plaintiffs' vehicles not
2 caused by the defects and nonconformities.

3 2963. When Plaintiffs sought to revoke acceptance, Toyota refused to accept
4 return of the Defective Vehicles and to refund Plaintiffs' purchase price and monies
5 paid.
6

7 2964. Plaintiffs and the Class would suffer economic hardship if they returned
8 their vehicles but did not receive the return of all payments made by them. Because
9 Toyota is refusing to acknowledge any revocation of acceptance and return
10 immediately any payments made, Plaintiffs and the Class have not re-accepted their
11 Defective Vehicles by retaining them.
12

13 2965. These defects and nonconformities substantially impaired the value of
14 the Defective Vehicles to Plaintiffs and the Class. This impairment stems from two
15 basic sources. First, the Defective Vehicles fail in their essential purpose because
16 they present an unreasonably high risk of sudden unintended acceleration (a risk
17 acknowledged by Toyota's recall), rendering them unsafe in a very material way.
18 Second, the repair and adjust warranty has failed of its essential purpose because
19 Toyota cannot repair or adjust the Defective Vehicles.
20

21 2966. Plaintiffs and the Class provided, within a reasonable amount of time,
22 notice of their intent to seek revocation of acceptance by a class-action lawsuit
23 seeking such relief. In addition, Plaintiffs (and many Class members) have requested
24 that Toyota accept return of their vehicles and return all payments made. Plaintiffs
25 on behalf of themselves and the Class hereby demand revocation and tender their
26 Defective Vehicles.
27
28

2967. Plaintiffs and the Class would suffer economic hardship if they returned their vehicles but did not receive the return of all payments made by them. Because Toyota is refusing to acknowledge any revocation of acceptance and return immediately any payments made, Plaintiffs and the Class have not re-accepted their Defective Vehicles by retaining them, as they must continue using them due to the financial burden of securing alternative means of transport for an uncertain and substantial period of time.

2968. Consequently, Plaintiffs and the Class are entitled to revoke their acceptances, receive all payments made to Toyota, and to all incidental and consequential damages, including the costs associated with purchasing safer vehicles, and all other damages allowable under law, all in amounts to be proven at trial.

COUNT V

BREACH OF CONTRACT/COMMON LAW WARRANTY

(Based On Wyoming Law)

2969. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2970. To the extent Toyota's repair or adjust commitment is deemed not to be a warranty under Wyoming's Commercial Code, Plaintiffs plead in the alternative under common law warranty and contract law. Toyota limited the remedies available to Plaintiffs and the Class to just repairs and adjustments needed to correct defects in materials or workmanship of any part supplied by Toyota, and/or warranted the quality or nature of those services to Plaintiffs.

2971. Toyota breached this warranty or contract obligation by failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

2972. As a direct and proximate result of Defendants' breach of contract or common law warranty, Plaintiffs and the Class have been damaged in an amount to be proven at trial, which shall include, but is not limited to, all compensatory damages, incidental and consequential damages, and other damages allowed by law.

COUNT VI

**BREACH OF IMPLIED COVENANT OF GOOD FAITH
AND FAIR DEALING**

(Based On Wyoming Law)

2973. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2974. As set forth above, Plaintiffs and the Class have entered into individual sales transactions and agreements with Toyota for the purchase Toyota vehicles.

2975. Plaintiffs and the Class have fully performed their obligations with Toyota under such transactions and agreements.

2976. At all times, Toyota owed Plaintiffs and the Class a duty to exercise and act in good faith and deal fairly with them in the performance of repairs of Defective Vehicles.

2977. Toyota has breached these duties and obligations in the manner and particulars set forth above, including, but not limited to, failing to repair the Defective Vehicles evidencing a sudden unintended acceleration problem, including those that were recalled, or to replace them.

1 2978. As a direct and proximate result of Defendants' failure to abide and
2 comply with their obligations and duties, Plaintiffs and the Class have suffered
3 pecuniary damages in an amount that has not yet been determined.

4
5 **COUNT VII**
6 **FRAUD BY CONCEALMENT**
7 **(Based On Wyoming Law)**

8 2979. Plaintiffs reallege and incorporate by reference all paragraphs as though
9 fully set forth herein.

10 2980. As set forth above, Defendants concealed and/or suppressed material
11 facts concerning the safety of their vehicles.

12 2981. Defendants had a duty to disclose these safety issues because they
13 consistently marketed their vehicles as safe and proclaimed that safety is one of
14 Toyota's highest corporate priorities. Once Defendants made representations to the
15 public about safety, Defendants were under a duty to disclose these omitted facts,
16 because where one does speak one must speak the whole truth and not conceal any
17 facts which materially qualify those facts stated. One who volunteers information
18 must be truthful, and the telling of a half-truth calculated to deceive is fraud.

19
20 2982. In addition, Defendants had a duty to disclose these omitted material
21 facts because they were known and/or accessible only to Defendants who have
22 superior knowledge and access to the facts, and Defendants knew they were not
23 known to or reasonably discoverable by Plaintiffs and the Class. These omitted facts
24 were material because they directly impact the safety of the Defective Vehicles.
25 Whether or not a vehicle accelerates only at the driver's command, and whether a
26 vehicle will stop or not upon application of the brake by the driver, are material
27
28

1 safety concerns. Defendants possessed exclusive knowledge of the defects rendering
2 Defective Vehicles inherently more dangerous and unreliable than similar vehicles.

3 2983. Defendants actively concealed and/or suppressed these material facts, in
4 whole or in part, with the intent to induce Plaintiffs and the Class to purchase
5 Defective Vehicles at a higher price for the vehicles, which did not match the
6 vehicles' true value.
7

8 2984. Defendants still have not made full and adequate disclosure and
9 continue to defraud Plaintiffs and the Class.

10 2985. Plaintiffs and the Class were unaware of these omitted material facts
11 and would not have acted as they did if they had known of the concealed and/or
12 suppressed facts. Plaintiffs' and the Class' actions were justified. Defendants were
13 in exclusive control of the material facts and such facts were not known to the public
14 or the Class.
15

16 2986. As a result of the concealment and/or suppression of the facts, Plaintiffs
17 and the Class sustained damage.

18 2987. Defendants' acts were done maliciously, oppressively, deliberately, with
19 intent to defraud, and in reckless disregard of Plaintiffs' and the Class' rights and
20 well-being to enrich Defendants. Defendants' conduct warrants an assessment of
21 punitive damages in an amount sufficient to deter such conduct in the future, which
22 amount is to be determined according to proof.
23
24
25
26
27
28

COUNT VIII
UNJUST ENRICHMENT
(Based On Wyoming Law)

2988. Plaintiffs reallege and incorporate by reference all paragraphs as though fully set forth herein.

2989. As a result of their wrongful and fraudulent acts and omissions, as set forth above, pertaining to the design defect of their vehicles and the concealment of the defect, Defendants charged a higher price for their vehicles than the vehicles' true value and Defendants obtained monies which rightfully belong to Plaintiffs.

2990. Defendants enjoyed the benefit of increased financial gains, to the detriment of Plaintiffs and the Class, who paid a higher price for vehicles which actually had lower values. Plaintiffs and other class members expected to be paid back for the difference between the actual vehicle value and the amount which Plaintiffs and the Class paid due to wrongful and fraudulent acts and omissions. It would be inequitable and unjust for Defendants to retain these wrongfully obtained profits.

2991. Plaintiffs, therefore, seek an order establishing Defendants as constructive trustees of the profits unjustly obtained, plus interest.

PRAYER FOR RELIEF

(a) Injunctive relief, restitution, statutory, and punitive damages under the CLRA;

(b) Restitution or restitutionary disgorgement as provided in CAL. BUS. & PROF. CODE § 17203 and CAL. CIV. CODE § 3343;

- 1 (c) Injunctive relief, restitution and appropriate relief under CAL. BUS. &
2 PROF. CODE § 17500;
- 3 (d) For appropriate damages for breach of express and implied warranties;
4 (e) For revocation of acceptance;
5 (f) For damages under the Magnuson-Moss Warranty Act;
6 (g) Punitive damages;
7 (h) For damages as allowed by the laws of the states as alleged in the
8 alternate counts;
9 (i) Attorneys' fees; and
10 (j) An injunction ordering Toyota to implement an effective fail-safe
11 mechanism on all vehicles with ETCS.
12
13

14 DATED: July 25, 2012.

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19 **DEMAND FOR JURY TRIAL**

20 Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by
21 jury on all issues so triable.

22 DATED: July 25, 2012.

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PROOF OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on July 25, 2012.

/s/ Steve W. Berman
Steve W. Berman

Exhibit A

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
2	GS 300	1999	1/10/2000	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on an unknown date the vehicle started to accelerate as he was braking while pulling into a parking space. Customer further claims that his wife had a similar incident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3	GS 300	1999	1/19/2000	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that while his wife was driving the vehicle on an unknown date, the RPMs rapidly increased and the car surged forward. Customer further claims this caused his wife to run through two stop signs and a school zone. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
4	GS 300	1999	2/2/2000	Customer called regarding her husband's 1999 Lexus GS 300. Specifically, customer claims that on 3 occasions the vehicle has jump started. Customer further claims that her husband had had the vehicle lurch forward as he has applied the brakes to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5	GS 300	2000	2/24/2000	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on three unknown dates his vehicle accelerated on its own and on one of these occasions went through his garage wall.
6	GS 300	2000	3/3/2000	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration by jumping forward.
7	GS 300	1998	3/6/2000	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on an unknown date the vehicle unintentionally accelerated while he was parking. Customer further claims that he felt the car lurch forward as he stepped on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
8	LS 400	1999	3/13/2000	Customer called regarding his 1999 Lexus LS 400. Specifically, customer claims that on unknown dates his vehicle exhibited unintended acceleration. An FTS inspected the vehicle.
9	LS 400	1998	3/14/2000	Customer called regarding his 1998 Lexus LS 400. Specifically, customer claims that on March 13, 2000, his vehicle continued to accelerate after he removed his foot from the accelerator causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
10	GS 300	1998	3/24/2000	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on March 22, 2000, as he was slowing to a stop the vehicle lurched forward.
11	TUNDRA	2000	3/27/2000	Customer called regarding his 2000 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle accelerated while in cruise control.
12	TUNDRA	2000	4/3/2000	Customer called regarding his 2000 Toyota Tundra 4x2 SR5. Specifically, customer claims that on unknown dates his vehicle surged while in cruise control mode and declining a hill. Customer claims that surging occurs while the vehicle is already in motion.
13	SC 300	1998	4/3/2000	Customer called regarding his 1998 Lexus SC 300 2-Dr Sport. Specifically, customer claims that on unknown dates the vehicle has revved and jumped after coming to a full stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while vehicle is at a full stop.
14	LS 400	1998	4/14/2000	Customer called regarding his 1998 Lexus LS 400. Specifically, customer claims that on an unknown date he had an accident because the vehicle continued to accelerate after customer let off the accelerator. Customer further claims his vehicle then struck another vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
15	TUNDRA	2000	4/20/2000	Customer called regarding his 2000 Toyota Tundra 4X4. Specifically, customer claims that on unknown dates when cruise control was on, the vehicle had unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
16	SC 300	1998	5/1/2000	Customer called regarding his 1998 Lexus SC 300. Specifically, customer claims that on May 1, 2000 his vehicle exhibited unintended acceleration when he applied his brakes. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when vehicle was already in motion.
17	LS 400	1999	5/9/2000	Customer called regarding his 1999 Lexus LS 400. Customer claims that on unknown dates, he experienced jerking or taking off very fast when accelerating.
18	TUNDRA	2000	5/25/2000	Customer called regarding his 2000 Toyota Tundra 4x4. Specifically, customer claims on an unknown date as he was stopping at a light the vehicle surged forward.
19	GS 300	1999	6/5/2000	Customer called regarding her 1999 Lexus GS 300. Specifically, customer claims that on unknown date her vehicle surged. An FTS inspected the vehicle.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
20	TUNDRA	2000	6/30/2000	Customer called regarding his 2000 Toyota Tundra 4x4 Limited. Specifically, customer claims that on unknown dates while his vehicle is in cruise control mode the vehicle has increased its speed above the set cruise control speed.
21	SC 400	1999	7/31/2000	Customer called regarding his 1999 Lexus SC400. Specifically, customer claims that on an unknown date his vehicle accelerated by itself, bumping the vehicle in front of him. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was at a stop.
22	LS 400	1998	9/14/2000	Customer called regarding his 1998 Lexus LS 400. Specifically, customer claims that for the past year the vehicle lurches forward on a slight pedal push. Customer further claims that when he comes around a turn the vehicle jumps forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
23	GS 400	2000	9/20/2000	Customer called regarding his 2000 Lexus GS 400. Specifically, customer claims that on September 20, 2000 while stopped at a stop sign, his car began bouncing and shaking. Customer further claims that his vehicle, on a series of dates accelerated while his foot was on the brake. Customer claims the acceleration occurred while the vehicle was stopped.
24	PRIUS	2001	9/23/2000	Customer called regarding her husband's 2001 Toyota Prius 4 Door. Customer claims that the vehicle lunged forward at times when traveling on a decline. Customer claims the lunge occurred while the vehicle was in motion.
25	GS 300	1999	10/11/2000	Customer called regarding her 1999 Lexus GS 300. Customer claims that on an unknown date, her vehicle suddenly accelerated. Customer further claims that when applying the brake, the engine surged forward. Customer claims that the vehicle's sudden acceleration occurred while the vehicle was in motion.
26	IS 300	2001	11/3/2000	Customer called regarding her 2001 Lexus IS 300. Specifically, customer claims that on November 3, 2000, her accelerator pedal stuck. Customer claims the sudden acceleration occurred while the vehicle was in motion.
27	LS 400	1998	11/9/2000	Customer called regarding his 1998 Lexus LS 400. Customer claims that on at least four occasions his car surged forward when he applied the brake pedal. Specifically, customer claims that on September 20, 2000 his car surged forward in a parking lot, nearly striking a woman. Customer further claims that at an unknown later date his car surged through a toll gate. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was in motion.
28	GS 300	1999	11/13/2000	Customer called regarding her 1999 Lexus GS 300. Specifically, customer claims that on unknown dates, her vehicle accelerated and experienced a rise in RPMs when the accelerator was not depressed.
29	GS 300	1999	11/20/2000	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on an unknown date, he was pulling into a parking spot and his vehicle suddenly accelerated by itself.
30	IS 300	2001	11/30/2000	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that on November 29, 2000 his vehicle continue to accelerate at speeds of 40-60 mph despite the gas pedal not being depressed. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
31	TUNDRA	2000	1/11/2001	Customer called regarding his 2000 Toyota Tundra 4x4. Specifically, customer claims that on several unknown dates, when the customer attempted to resume cruise control the vehicle accelerated on its own uncontrollably. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
32	GS 300	2000	1/16/2001	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on a series of unknown dates, his accelerator stuck while his car was in motion. Customer further claims that his engine revved while the accelerator was stuck. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
33	GS 300	2001	2/2/2001	Customer called regarding his 2001 Lexus GS 300. Specifically, customer claims that on December 30, 2000, January 14, 2001, January 17, 2001 and January 23, 2001 his car suddenly accelerated. Customer further claims that the acceleration continued even when he applied the brake. Customer claims this sudden acceleration occurred when the vehicle was already in motion.
34	GS 300	2001	2/23/2001	Customer called regarding his 2001 Lexus GS300. Specifically, customer claims that while pulling into a parking space, his vehicle suddenly accelerated and hit the vehicle in front of him. Customer further his engine revved unexpectedly when he put the vehicle in neutral. A Field Technical Specialist (FTS) inspected the vehicle. The customer claims the sudden acceleration occurred while the vehicle was in motion.

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35	GS 300	2001	3/2/2001	Customer called regarding his 2001 Lexus GS 300. Specifically, customer claimed that on seven occasions on unknown dates his vehicle had experienced unintended acceleration. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
36	LS 400	1999	3/2/2001	Customer called regarding his 1999 Lexus LS 400. Specifically, customer claims the vehicle jumped forward on several occasion on unknown dates. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
37	GS 300	2000	3/23/2001	Customer called regarding her 2000 Lexus GS 300. Customer claims that on an unknown date, the vehicle accelerated by itself, causing minor damages. A Field Technical Specialist (FTS) inspected the vehicle.
38	GS 300	2001	3/28/2001	Customer called regarding his 2001 Lexus GS 300. Customer claims his vehicle experienced sudden acceleration on an unknown series of days. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
39	GS 300	1999	3/30/2001	Customer called regarding his 1999 Lexus GS 300. Customer claims that on six occasions his vehicle surged forward. Customer further claims that on an unknown date, his daughter attempted to park the vehicle in his garage and the vehicle surged forward, damaging the vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
40	SC 400	1998	4/19/2001	Customer called regarding his 1998 Lexus SC 400. Customer claims his vehicle surged forward intermittantly several times on unknown dates. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
41	PRIUS	2001	4/20/2001	Customer called regarding her 2001 Toyota Prius 4 Door. Customer claims the vehicle suddenly accelerated while parked on April 20, 2001. Customer further claims that vehicle struck the curb while she continued to have her foot on the brake. Customer claims the sudden acceleration occured while the vehicle was parked.
42	IS 300	2001	4/20/2001	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that as of April 3, 2001 he was experiencing self-acceleration in the vehicle. Customer further claims that no accident or damage had resulted from the acceleration. Customer claims this sudden acceleration occured while the vehicle was already in motion.
43	TUNDRA	2000	4/23/2001	Customer called regarding her 2000 Toyota Tundra. Specifically, customer claims, on unknown dates, that the vehicle cruise control is not working properly. Customer further claims that when the vehicle comes out of overdrive, it shifts down to a lower gear and throws the customer back into her seat, and the rpm revs to 3500. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
44	IS 300	2001	4/24/2001	Customer called regarding her 2001 Lexus IS 300. Specifically, customer claims that on April 19, 2001, her vehicle's acclerator stuck. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
45	GS 300	1999	4/26/2001	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that his vehicle experienced multiple instances of unintended acceleration while pushing the gas pedal. An FTS inspected the vehicle. Customer claims the unintended acceleration occurred while the vehicle was already in motion.
46	IS 300	2001	4/30/2001	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that on an unknown date his accelerator stuck while driving. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
47	TUNDRA	2001	5/2/2001	Customer called regarding his 2001 Toyota Tundra Limited. Specifically, customer claims that on May 2, 2001 his vehicle surged forward while at a stop. Customer claims that the sudden acceleration occurred while the vehicle was at a stop.
48	GS 300	2001	5/7/2001	Customer called regarding his 2001 Lexus GS 300. Specifically, customer claims that on an unknown date his vehicle experience unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
49	TUNDRA	2000	5/7/2001	Customer called regarding his 2000 Toyota Tundra 4x4. Customer claims that on unknown dates, the accelerator pedal engaged without cruise control being active. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
50	TUNDRA	2000	5/10/2001	Customer called regarding his 2000 Toyota Tundra 4x4. Specifically, customer claims his accelerator seemed to go down to the floor without the customer pushing the accelerator down on an unknown date. Customer claims this problem occurred while the vehicle was already in motion.
51	4RUNNER LIMITED	2001	6/1/2001	Customer called regarding her Toyota 4 Runner Limited. Specifically, customer claims that while using cruise control, her car surged on June 1, 2001. Customer claims this problem occurred while the vehicle was already in motion.

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52	LX 470	2001	7/16/2001	Customer called regarding her Lexus LX 470. Customer claims the engine surged on her vehicle while at a complete stop on an unknown date. Customer further claims that the engine revved too fast while idling. Customer claims that the sudden acceleration occurred while the vehicle was at a stop.
53	GS 300	1999	7/26/2001	Customer called regarding his 1999 Lexus GS 300. Customer claims that on unknown dates, the vehicle accelerates when his foot is on the brake while attempting to park. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
54	LS 400	2000	8/13/2001	Customer called regarding his 2000 Lexus LS 400. Specifically, customer claims that on an unknown series of dates his vehicle experienced intermitten sudden acceleration from a stop. Customer further claims this acceleration felt like somebody hit him from behind. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
55	TUNDRA	2001	8/15/2001	Customer called regarding his 2001 Toyota Tundra Limited. Specifically, customer claims that on an unknown set of dates his cruise control aggressively accelerated while going down hills. Customer further claims this caused his car to increase speed over his cruise control's set point. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
56	TUNDRA	2001	11/12/2001	Customer called regarding his 2001 Toyota Tundra SR5. Specifically, customer claims that on unknown dates, he had concerns about his vehicle accelerating by itself.
57	TUNDRA	2000	11/26/2001	Customer called regarding his 2000 Toyota Tundra 4X4. Specifically, customer claims his crusic control would speed up without the customer making it. Customer further claims this lead to his rear wheels spinning out. Customer claims this sudden acceleration occurred while the vehicle was in motion.
58	SC 430	2002	12/5/2001	Customer called regarding his 2002 Lexus SC 430. Specifically, customer claims he experienced an engine surge during warm-up in October 2001. Customer further claims that this surge made it difficult to stop the vehicle. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
59	SEQUOIA	2001	12/7/2001	Customer called regarding her 2001 Toyota Sequoia Limited. Specifically, customer claims that the vehicle surges forward when she is stopped with her foot on the break. Customer claims this sudden acceleration occurs when the vehicle is stopped.
60	CAMRY	2002	12/10/2001	Customer called regarding his 2002 Toyota Camry LE. Specifically customer claims that on December 10, 2001, his vehicel raced when put into reverse. Customer further claims that this acceleration caused him to hit 2 other vehicles while trying to back into a parking space. The customer claims that the sudden acceleration occurred while the vehicle was already in motion.
61	TUNDRA	2001	12/11/2001	Customer called regarding his 2001 Toyota Tundra SR5. Specifically customer claims that on December 11, 2001 his throttle was sticking. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
62	LS 430	2001	1/11/2002	Customer called regarding his 2001 Lexus LS 430. Specifically, customer claims that an unknown series of dates the vehicle lurched forward while at the brakes were applied at a stop. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occured while the vehicle was at a stop.
63	ES 300	2002	1/24/2002	Customer claims that the vehicle surged when accelerating from a stop. The vehicle was checked for diagnostic trouble codes, and none were found. A snapshot was taken with the scan tool. The Bank 1 A/F sensor was replaced.
64	PRIUS	2001	1/28/2002	Customer called regarding his 2001 Toyota Prius 4 Door. Specifically, customer claims that on January 28, 2002 the vehicle surged forward while he attempted to coast into his driveway. Customer further claims this lead him to crash into his garage door, damaging bikes, a water softener, and another vehicle. An FTS inspected the vehicle. Customer claims that this sudden acceleration occurred while the vehicle was already in motion.
65	IS 300	2001	2/6/2002	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that on February 6, 2002 the vehicle was involved in an accident when the accelerator stuck on its own. Customer further claims the car continued in motion until it struck a tree. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
66	CAMRY	2002	2/12/2002	Customer called regarding her 2002 Toyota Camry LE. Customer claims her accelerator pedal stuck on occasion during unknown dates. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
67	SEQUOIA	2002	2/21/2002	Customer called regarding her 2002 Toyota Sequoia SR5. Specifically, customer claims that the vehicle would pump forward when she applied the brakes. Customer claims this sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
68	SEQUOIA	2002	2/22/2002	Customer called regarding her 2002 Toyota Sequoia SR5. Specifically, customer claims the vehicle would pump forward after braking. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
69	CAMRY	2002	3/4/2002	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on March 4, 2002, his vehicle took off when he pressed the accelerator. Customer further claims this incident only occurred once. Customer claims this sudden acceleration occurred when the vehicle was at a standstill and initially accelerating.
70	CAMRY	2002	3/6/2002	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on unknown dates in 2002, she has noticed jolts, particularly while stopped at lights, and feels the car is accelerating by itself. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
71	CAMRY	2002	3/12/2002	Customer called regarding his 2002 Toyota Camry XLE. Customer claims that 3 to 4 times per week on unspecified dates his car would surge or buck forward while traveling at highway speeds. Customer further claims that when travelling around 55 MPH his vehicle would jerk back suddenly. Customer claims this sudden acceleration occurred when the vehicle was already in motion.
72	CAMRY	2002	3/12/2002	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown series of dates, his accelerator was sticky and his breaks would not properly slow his vehicle. Customer further claims that engine would rev unexpectedly while driving. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
73	IS 300	2001	3/13/2002	Customer called regarding her 2001 Lexus IS 300. Specifically the customer claims that on March 9, 2002, her vehicle accelerator rapidly upon placed into drive leading to an accident. The customer further claims that she quickly accelerator to approximately 10 mph before the vehicle collided with a chainlink fence. Customer claims the sudden acceleration occurred while the vehicle was not in motion.
74	GS 300	2000	3/14/2002	Customer called regarding his 2000 Lexus GS300. Specifically, customer claims that on unknown dates the car accelerates on its own to over 100 mph. Customer further claims this burned up his vehicle's brakes. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
75	CAMRY	2002	3/14/2002	Customer called regarding her 2002 Toyota Camry LE. Specifically, on March 12, 2002 customer attempted to move her vehicle inside to her garage and the vehicle surged forward. The customer further claims the vehicle hit and cracked a wall, and that the accident did damage to her vehicle. Customer claims this sudden acceleration occurred while the vehicle was at rest.
76	Camry	2002	3/21/2002	Customer claims that there was a severe engine surge on light to moderate acceleration. Condition was duplicated by holding engine speed in Park at 3500 RPM for 3 minutes. The A/F sensor was replaced.
77	CAMRY	2002	3/25/2002	Customer called regarding his 2002 Camry LE. Customer claims that on March 22, 2002 the accelerator on his car stuck and the car moved into his yard. Customer claims this sudden acceleration occurred while the vehicle was parked.
78	Camry	2002	3/27/2002	Customers claim to experience a "surging" condition, or "slight misfire" sensation, that appears most often at steady cruising speeds but can also occur under acceleration. Diagnostics were attempted that did not find malfunction or abnormal operation of the A/F Ratio Sensors. Both sensors had been replaced in an attempt to correct the "surging" condition but had no effect.
79	CAMRY	2002	4/4/2002	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on March 27, 2002 when he backed up his engine surges. Customer further claims he can not stop the vehicle when this surge happens. Customer claims this sudden acceleration occurs while the vehicle is already in motion.
80	GS 300	2000	4/9/2002	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on an unknown date his acceleration pedal stuck. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
81	GS 300	2000	4/16/2002	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on an unknown date his acceleration pedal stuck. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
82	PRIUS	2001	4/18/2002	Customer called regarding his 2001 Toyota Prius 4 Door. Customer's daughter was driving the vehicle. Specifically, customer claims that on April 18, 2002, his daughter's vehicle surged forward when the warning lights came on in the vehicle. Customer further complained that the problems remained after taking the vehicle to the dealers. Customer claims the sudden motion occurred while the vehicle was already in motion.

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83	Camry, ES 300	2002, 2002	5/20/2002	There were complaints of surging in vehicles. Conducted a field test on six vehicles and confirmed the actual surge level. Conducted various tests under different conditions and determined that the root cause of the surging condition remained unknown. Also confirmed that changes made to the shift schedule for the Lock-Up during the testing and evaluation made the surging condition disappear.
84	CAMRY	2002	5/21/2002	Customer called regarding his 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date when he put his vehicle into gear the engine revs and accelerates quickly. Customer further states that he can only stop vehicle by applying brake with force and that this has happened 7 times.
85	CAMRY	2002	5/22/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, customer lost brake control and the vehicle's engine surged.
86	CAMRY	2002	6/3/2002	Customer called regarding 2002 Toyota CAMRY LE. Specifically, customer claims that on May 25, 2002, customer's mother was driving vehicle when engine revved and vehicle had unintended acceleration. Customer further claims his mother used brakes but vehicle jumped several curbs and struck fence. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
87	Camry	2002	6/4/2002	Customer claims that the vehicle surges/vibrates under light throttle between 35-50 mph on a smooth, flat road surface. Vehicle's Lock up operation tested; found that when Lock up was engaged, the vehicle surged or vibrated, and when it was disengaged the surge or vibration stopped. Additionally, found that when the Lock up was engaged, the transmission and engine assemblies shook severely, and that there is no engine mount to help support the engine and transmission assembly on the rear of the subframe. No repair made.
88	Camry	2002	6/4/2002	Customer claims that the vehicle surges at 40 mph under light throttle. Vehicle was tested on the scan tool, and it was found that when Lock up was engaged, the vehicle surged and vibrated. It was determined that as compared with another like vehicle, the same condition occurred. No action was taken.
89	TUNDRA	2001	6/5/2002	Customer called regarding his 2001 Toyota TUNDRA SR5. Specifically, customer claims that on an unknown date, when vehicle is in gear and defrost mode is engaged, vehicle revs to a high level and lunges forward.
90	CAMRY	2002	6/6/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date his vehicle surged, which has occurred at 30 mph and 60 mph. Customer further states that vehicle surges when coming to complete stop. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
91	4RUNNER SR5	2001	6/7/2002	Customer called regarding his 2001 Toyota 4Runner SR5. Specifically, customer claims that on an unknown date when customer comes to a complete stop the vehicle surges ahead.
92	CAMRY	2002	6/12/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date a driver applied the brakes which did not fully engage. Customer further states that customer then hit another vehicle and customer vehicle surged when put into reverse. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
93	GS 300	2000	6/13/2002	Customer called regarding her 2000 Lexus GS 300. Specifically, customer claims that on unknown dates, when she pushed on the gas pedal, the pedal would continue to move closer to the floor. Customer further claims that when she tried to press on the brakes, the brakes squealed loudly because the vehicle kept accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
94	CAMRY	2002	6/14/2002	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, customer placed her car in reverse with brake engaged when vehicle surged. Customer further states that she applied brakes and vehicle did not stop until hitting a curb.
95	PRIUS	2002	6/18/2002	Customer called regarding her 2002 Toyota PRIUS 4-DOOR. Specifically, customer claims that on an unknown date her vehicle lurches forward upon start or while her foot is on brake. Customer further notes that vehicle rolls slightly while in park and brake make noise.
96	CAMRY	2002	6/20/2002	Customer called regarding his 2002 Toyota CAMRY SE. Specifically, customer claims that on two unknown dates the vehicle lunged forward with acceleration from a full stop and with customer's foot on brake. An FTS inspected the vehicle.

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97	CAMRY	2002	6/24/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, customer was slowing to park in driveway when vehicle accelerated and customer hit wall. Customer further claims that when he put vehicle in reverse, it surged backwards. When customer re-engaged drive gear, vehicle hit house second time. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
98	GS 300	1998	6/25/2002	Customer called regarding her 1998 Lexus GS 300. Specifically, customer claims that on unknown dates, her vehicle suddenly surged when attempting parking and crashed into walls. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
99	Camry, ES 300	2002, 2002	6/28/2002	There were two possible complaints of A/F sensor failure. Customer complained of surge during steady cruise, 30-44 mph. Technician confirmed erratic voltage changes and sweeping fuel trim values. Vehicles were repaired by replacing A/F sensors.
100	CAMRY	2002	7/2/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, customer was slowing to park in driveway when vehicle accelerated and customer hit wall. Customer further claims that when he put vehicle in reverse, it surged backwards. When customer re-engaged drive gear, vehicle hit house second time. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
101	CAMRY	2002	7/3/2002	Customer called regarding her 2002 Toyota Camry LE. Specifically customer claims that on July 3, 2002 her vehicle accelerated rapidly while she backed out of a parking spot. Customer further claims the vehicle collided with two other vehicles. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
102	CAMRY	2002	7/8/2002	Customer called regarding his 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date, while waiting at a stop light, his vehicle surged forward and struck another car. Customer further claims that vehicle engine revved to over 6,000 rpm. An FTS inspected the vehicle.
103	GS 300	1998	7/9/2002	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on an unknown date his wife experienced a sticking accelerator. An FTS inspected the vehicle.
104	ES 300	2002	7/18/2002	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on an unknown date, while her vehicle was in neutral, it surged forward and struck a pole across the street.
105	TUNDRA	2001	7/24/2002	Customer called regarding his 2001 Toyota TUNDRA SR5. Specifically, customer claims that on an unknown date, his vehicle was at a full stop with his foot on brake, when vehicle surged forward with high rpm's and jumped curb, striking tree and fire hydrant.
106	CAMRY	2002	7/25/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on unknown dates, but approximately five times, his vehicle accelerated while the brake pedal was engaged.
107	CAMRY	2002	7/30/2002	Customer called regarding his 2002 Toyota CAMRY SE. Specifically, customer claims that on unknown dates, his vehicle lunged forward while customer applied the brake. An FTS inspected the vehicle.
108	CAMRY	2002	7/30/2002	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on unknown dates, her vehicle's engine surged and the vehicle struck other vehicles. An FTS inspected the vehicle.
109	TUNDRA	2002	8/3/2002	Customer called regarding her 2002 Toyota TUNDRA LIMITED. Specifically, customer claims that on unknown dates, while customer engages a/c but does not engage accelerator, vehicle idles too fast and can move.
110	TUNDRA	2002	8/9/2002	Customer called regarding his 2002 Toyota TUNDRA LIMITED. Specifically, customer claims that on unknown dates, when cruise control is engaged on his vehicle, it can experience acceleration. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
111	CAMRY	2002	8/13/2002	Customer called regarding his 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date, while his vehicle was stopped at a red light, the vehicle lurched forward. Customer further reports that on another unknown date, while backing into a parking space, the vehicle lurched and struck another car.
112	4RUNNER SR5	2001	8/22/2002	Customer called regarding his 2001 Toyota 4RUNNER SR5. Specifically, customer claims that on unknown dates, when cruise control is engaged on vehicle and vehicle is on incline, customer experiences acceleration. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
113	CAMRY	2002	8/23/2002	Customer called regarding 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date, while exiting a car wash and with his vehicle in neutral, the vehicle experience acceleration. Customer further claims that his vehicle accelerated into traffic and struck a truck, causing it to roll over twice.
114	CAMRY	2002	8/26/2002	Customer called regarding her 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date, while vehicle is stopped and her foot is on brake, customer feels vehicle is going to lurch forward. Customer further reports that when vehicle stops, rpm's drop and vehicle vibrates.
115	CAMRY	2002	8/26/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, while his wife was driving vehicle at approximately 3-5 mph, the vehicle accelerated uncontrollably and struck another car, jumped a curb, and struck a wall. Customer's wife further reported that engine continued revving and spinning tires until wife shut off engine. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
116	CAMRY	2002	8/30/2002	Customer called regarding an insured's 2002 Toyota CAMRY LE. Specifically, customer claims that on unknown date the insured was attempting to park the vehicle when it lurched forward and struck a pedestrian. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
117	ES 300	2002	9/18/2002	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on an unknown date while her husband was driving vehicle and approaching a parking space and with foot on brake, the car would not stop. Customer further claims that vehicle hit a bush and wall. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
118	GS 300	1998	9/19/2002	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on unknown dates, his vehicle accelerated without his foot on the gas.
119	CAMRY	2002	9/26/2002	Customer's daughter called regarding customer's 2002 Toyota Camry LE. Specifically, customer's daughter claims that on September 26, 2002, she put the key in the ignition and the vehicle automatically reversed on its own at 50 mph and hit 2 other vehicles. Customer's daughter claims that the sudden acceleration occurred while the vehicle was at a full stop.
120	CAMRY	2002	10/15/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date he had concerns that pressure applied to vehicle's brakes caused vehicle's accelerator to engage.
121	CAMRY	2002	10/21/2002	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, while vehicle was stopped, the vehicle surged forward and struck another vehicle. Customer further reports that, on three other unknown dates, the vehicle surged from a stop and struck a curb.
122	CAMRY	2002	10/21/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, while exiting a car wash, vehicle was in neutral and customer had his foot on brake when vehicle surged forward, jumping a curb and hitting a pole. Customer further claims that vehicle had high rpms and required him to pull parking brake to stop vehicle.
123	SC 300	1999	10/30/2002	Customer called regarding her 1999 Lexus SC 300. Specifically, customer claims that on unknown dates, while driving her vehicle at approximately 20 mph, the vehicle experienced unintended rapid acceleration. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
124	PRERUNNER	2003	11/4/2002	Customer called regarding his 2003 Toyota PRERUNNER. Specifically, customer claims that on an unknown date his vehicle's accelerator become stuck and customer had an accident.
125	CAMRY	2002	11/13/2002	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on unknown dates, while car is in drive gear and stopped, the vehicle accelerates and tachometer reaches redline while car leaps forward.
126	CAMRY	2002	11/18/2002	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date, he was pulling into grocery store at about 5-10 mph when the vehicle accelerated suddenly and hit a guardrail before customer could depress the brake. Customer further claims that the vehicle also suddenly accelerated the prior week when starting from a red light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
127	GS 300	1999	11/19/2002	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated causing an accident. An FTS inspected the vehicle.

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1	Model	Model Year	Report or claim date	Summary
128	CAMRY	2003	12/2/2002	Customer called regarding his 2003 Toyota CAMRY LE. Specifically, customer claims that on an unknown date, while customer was entering garage the vehicle lunged forward and struck garage. An FTS inspected the vehicle. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
129	CAMRY	2003	12/3/2002	Customer called regarding her 2003 Toyota CAMRY LE. Specifically, customer claims that on an unknown date her accelerator stuck and her vehicle lunged forward into a garage.
130	CAMRY	2002	12/4/2002	Customer called regarding she 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date she was driving vehicle at approximately 5 to 10 mph when vehicle accelerated, ran over cement divider and struck fence. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
131	SEQUOIA	2002	12/5/2002	Customer called regarding her 2002 Toyota SEQUOIA LIMITED. Specifically, customer claims that on an unknown date, vehicle was at stop light when vehicle lunged forward with no increase in rpm.
132	CAMRY	2003	12/11/2002	Customer called regarding his 2003 Toyota Camry XLE. Customer claims that on unknown dates, the vehicle accelerated and decelerated on its own.
133	4RUNNER SR5	2002	12/13/2002	Customer called regarding his 2002 Toyota 4RUNNER SR5. Specifically, customer claims that on an unknown date his daughter was driving vehicle and applying the brake when the engine surged and vehicle jumped a curb and hit a fence. Customer further claims his daughter engaged the emergency brake and shut off engine. An FTS inspected the vehicle.
134	ES 300	2003	12/18/2002	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on an unknown date, vehicle experienced unintended acceleration which caused vehicle to strike curb.
135	ES 300	2002	12/19/2002	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on an unknown date, vehicle experienced unintended acceleration resulting in an accident. An FTS inspected the vehicle.
136	CAMRY	2002	12/30/2002	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on December 28, 2002, he was pulling into his driveway when his accelerator stuck, his engine revved, and the vehicle lunged forward, rear-ending a parked car despite applying the breaks. Customer further claims that after the impact, the vehicle lunged forward again, pushing the vehicle into the residence. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
137	CAMRY	2002	1/7/2003	Customer called regarding her 2002 Camry XLE. Specifically, customer claims that on unknown dates, the vehicle accelerated on its own while at high speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
138	IS 300	2001	1/7/2003	Customer called regarding his 2001 IS 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, his throttle pedal stuck.
139	CAMRY	2002	1/8/2003	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on an unknown date, he was parking his vehicle when it surged forward over a cement block. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
140	4RUNNER SR5	2003	1/16/2003	Customer called regarding his 2003 4Runner SR5 (V8). Specifically, customer claims that on an unknown date, he was unable to slow down the vehicle pulling out of his driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
141	GS 300	2001	1/16/2003	Customer called regarding her 2001 GS 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, the vehicle surged forward, causing an accident on two occasions. Customer further claims CLAIM. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
142	CAMRY	2002	1/21/2003	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on an unknown date, the vehicle surged forward over a cement block as he was parking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
143	CAMRY	2002	1/22/2003	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on unknown dates, the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
144	LX 470	2002	1/23/2003	Customer called regarding her 2002 LX 470 4x4 SUV (V8). Specifically, customer claims that on an unknown date, she was at a stop light when the vehicle started jumping and caused her to hit the car in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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1	Model	Model Year	Report or claim date	Summary
145	4RUNNER SR5	2003	1/28/2003	Customer called regarding a 2003 Toyota 4Runner SR5. Specifically, customer claims that on an unknown date during a dealer test drive, the test vehicle continued to accelerate on the freeway when he took his foot of the gas pedal. Customer further claims that this happened twice during the test drive and that he had to brake and turn off the vehicle to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
146	CAMRY	2002	1/28/2003	Customer called regarding her 2002 Camry LE. Specifically, customer claims that on unknown date, the vehicle surged forward while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
147	CAMRY	2002	2/4/2003	Customer called regarding his 2002 Camry XLE. Specifically, customer claims that on an unknown date, his break pedal dropped out from under his foot, causing his foot to get stuck on the accelerator, almost causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
148	TUNDRA	2003	2/4/2003	Customer called regarding her 2003 Tundra SR5 (V8). Specifically, customer claims that on unknown dates, the vehicle shot forward given almost no application of gas.
149	TUNDRA	2002	2/5/2003	Customer called regarding his 2002 Tundra SR5 (V8). Specifically, customer claims that on unknown dates, his accelerator stuck.
150	TUNDRA	2002	2/6/2003	Customer called regarding his 2002 Tundra SR5 (V8). Specifically, customer claims that on unknown dates, the throttle stuck and the accelerator stayed open.
151	CAMRY	2002	2/11/2003	Customer called regarding her 2002 Camry LE. Specifically, customer claims that on unknown dates, her vehicle surged forward, both upon starting up and at speeds between 25-40 MPH. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was both at a full stop and already in motion.
152	GS 300	2000	2/18/2003	Customer called regarding her 2000 GS 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, her accelerator stuck when she yielded or stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
153	CAMRY	2002	2/18/2003	Customer called regarding his 2002 Camry XLE (V6). Specifically, customer claims that on January 7, 2003, his engine stalled in traffic and he veered off the road. Customer further claims that once he'd corrected, the vehicle suddenly accelerated across traffic and rolled over. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
154	CAMRY	2003	2/19/2003	Customer called regarding his 2003 Camry LE. Specifically, customer claims that on unknown dates, when the vehicle was in drive, the vehicle accelerated even with no application of gas. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
155	IS 300	2002	2/25/2003	Customer called and claimed that on an unknown date, his daughter was driving a 2002 IS 300 4-Dr Sedan when it suddenly accelerated from 45 mph to 80 mph and the brakes failed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
156	GS 300	1999	3/4/2003	Customer called regarding her 1999 Lexus GS 300. Customer claims that on an unknown date, the vehicle leaped forward without the accelerator being pressed and hit five other vehicles.
157	PRERUNNER	2003	3/10/2003	Customer called regarding her 2003 Toyota Prerunner. Specifically, customer claims that on unknown dates, her vehicle accelerated on its own and revved while stopped at a stoplight and left skid marks as the vehicle took off.
158	TACOMA	2003	3/10/2003	Customer called regarding her 2003 Toyota Tacoma. Specifically, customer claims, on unknown dates, that the idle on the truck picked up when her husband was going around a corner at approx. 5mph and caused him to go into a median causing front damages. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
159	ES 300	2002	3/13/2003	Customer claims that the vehicle surges when driving up hills or under steady acceleration. One of the sensors was reading erratically and was replaced, which corrected the surging condition.
160	ES 300	2002	3/13/2003	Customer claims that the vehicle surges when driving up hills or under steady acceleration. One of the sensors was reading erratically and was replaced, which corrected the surging condition.
161	Camry	2003	3/17/2003	Driver claims that the engine surges at cruise. It is also claimed that the engine stalls at idle after warm-up, and that the fuel tank will not fill to the full position on the fuel gauge. To remedy the condition, the fuel tank was replaced, the EVAP canister was replaced, and the fresh air filter was replaced.
162	CAMRY	2002	3/18/2003	Customer called regarding her 2002 Camry LE. Customer claims that the vehicle will accelerate even when the brake is being pressed.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
163	SEQUOIA	2002	3/19/2003	Customer called regarding his 2002 Sequoia SR5 4 WD SUV. Specifically, customer claims that on unknown dates, the vehicle surged when he stepped on the gas pedal. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
164	CAMRY	2003	3/19/2003	Customer called regarding his 2003 Camry XLE. Customer claims that on an unknown date, when his wife was pulling into a parking spot, the brakes would not stop the vehicle and the vehicle crashed into a building. Customer claims that when an employee of the building was backing the vehicle out of the building, the brakes failed again. Customer claims that the incidents occurred while the vehicle was already in motion.
165	CAMRY	2002	3/21/2003	Customer called regarding his 2002 Camry XLE (V6). Specifically, customer claims that on an unknown date, he was driving when his vehicle suddenly accelerated across traffic and rolled over. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
166	CAMRY	2002	3/24/2003	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates, when she backed out of her driveway and put her vehicle in drive, she felt a short jerk. Customer further claims she was driving 30mph on the freeway and when she went to park the vehicle "took charge" like her foot was on accelerator when it was not. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and already in motion.
167	CAMRY SOLARA SE	2003	4/4/2003	Customer called regarding her 2003 Camry Solar SE. Specifically, customer claims that on an unknown date, the gas pedal became inoperative, causing the vehicle to race forward and hit the back of a parked van. Customer further claims that after the impact, the engine continued revving. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
168	GS 300	1998	4/7/2003	Customer called regarding his 1998 GS 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, his throttle pedal stuck.
169	IS 300	2001	4/8/2003	Customer called regarding his 2001 IS 300 4-Dr Sedan. Specifically, customer claims that on April 8, 2003, his accelerator stuck twice.
170	SEQUOIA	2002	4/9/2003	Customer called regarding his 2002 Sequoia SR5 4 WD SUV. Specifically, customer claims that on unknown dates, the vehicle surged upon application of gas. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
171	CAMRY	2002	4/14/2003	Customer called regarding her 2002 Camry SE (V6). Specifically, customer claims that on an unknown date, she was back out of her driveway when the vehicle suddenly accelerated backwards across the street and into a tree. Customer further claims that she was breaking at the time and did not touch the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
172	GS 300	1999	4/14/2003	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on an unknown date his vehicle took off when he put the vehicle in drive. Customer further claims that his foot was not on the accelerator and the car accelerated by itself. An FTS inspected the vehicle.
173	SIENNA	2004	4/16/2003	Customer called regarding a 2004 Toyota Sienna he test drove. Specifically, customer claims that on an unknown date, the vehicle's cruise control activated automatically and the brakes failed to stop the vehicle.
174	CAMRY	2002	4/17/2003	Customer called regarding his 2002 Camry LE (V6). Specifically, customer claims that on unknown dates, the vehicle surged while accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
175	Camry	2002	4/21/2003	Customer claims that the vehicle exhibited a rhythmic engine surge most noticeable while traveling at 40-50 mph and while the engine was operating at a normal temperature. The A/F Sensor and the Bank 1 Exhaust Manifold were replaced which restored normal A/F Sensor output and proper engine operation.
176	TUNDRA	2001	4/29/2003	Customer called regarding his 2001 Tundra Limited (V8). Specifically, customer claims that on unknown dates, the throttle stuck and the vehicle leapt forward when coming to a stop. Customer further claims that vehicle "has idle surges," and occasionally lurches when the brake is released. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
177	CAMRY	2003	5/12/2003	Customer called regarding his 2003 Camry LE. Specifically, customer claims that on an unknown date, he was at a stop light when the RPM indicator went up and the vehicle tried to move forward, but that he was able to brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
178	CAMRY	2002	5/14/2003	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date his vehicle leaped backwards as he was backing out of a parking space. Customer claims that sudden acceleration occurred while vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
179	LS 400	1999	5/14/2003	Customer called and claimed that on unknown dates, his father was driving his 1999 LS 400 4-Dr Sedan when the vehicle accelerated suddenly and once caused him to rear end another vehicle. The Field Technical Specialist (FTS) inspected the vehicle.
180	CAMRY	2002	5/27/2003	Customer called regarding her 2002 Camry LE. Specifically, customer claims that on an unknown date, customer was pulling into a parking spot when the vehicle took off on its own and hit a tree. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
181	GS 300	2000	6/10/2003	Customer called regarding her 2000 GS 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, the vehicle surged while in idle and lunged forward while stopped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
182	LX 470	2000	6/13/2003	Customer's son called regarding his 2000 Lexus LX 470. Specifically, customer claims that on an unknown date the vehicle suddenly accelerated and the customer collided with a tree. Customer further claims the gas pedal was stuck against the floorboard. Customer further claims the vehicle took off as he tried to leave the parking lot. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
183	ES 300	2003	6/13/2003	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates the accelerator pedal got stuck. Customer further claims that while she was stopped at a red light, the vehicle moved itself. Customer claims that the sudden acceleration occurred while vehicle was at a full stop.
184	CAMRY	2002	6/17/2003	Insurrer called on behalf of customer regarding his 2002 Camry LE (V6). Specifically, customer claims that on unknown dates, the accelerator stuck and he rear-ended a vehicle in front of him twice.
185	ES 300	2003	6/20/2003	Customer called regarding her 2003 ES 300 4-Dr Sedan. Specifically, customer claims that on an unknown date, the engine revved and pulled the vehicle forward. Customer further claims that she had to turn off the engine to get the vehicle to stop. The Field Technical Specialist (FTS) inspected the vehicle.
186	CAMRY	2002	6/20/2003	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date he was driving the vehicle when it accelerated, causing him to strike a vehicle and sideswipe a tree before coming to a stop.
187	Sienna	2004	6/23/2003	Transaxle appeared to be in 3rd gear regardless of shift selector position (R, D, 2 and 1). Placing the vehicle into neutral caused the vehicle to creep as if transaxle were partially engaging a forward gear. Technician test drove the vehicle and confirmed the condition. The specific cause of the condition was unknown, although analysis indicated that the transaxle had sustained mechanical damage. Transaxle assembly and torque converter were to be replaced.
188	CAMRY	2002	6/25/2003	Customer called and claimed that on an unknown date, his wife was driving their 2002 Camry LE when, upon starting the car and shifting into reverse, the car shot off and and hit a tree. Customer further states that his wife had her foot on the brake when the vehicle took off. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
189	ES 300	2003	6/25/2003	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on unknown dates the vehicle revved high and surged while stopped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
190	ES 300	2003	7/2/2003	Customer called regarding his 2003 ES 300 4-Dr Sedan. Specifically, customer claims that on unknown dates, upon putting his foot on the gas pedal, the vehicle surged and lunged forward. The customer further claims that the vehicle also jerked.
191	LS 400	1998	7/3/2003	Customer called regarding his 1998 LS 400 4-Dr Sedan. Specifically, customer claims that on unknown dates, his engine surged.
192	GS 300	2000	7/7/2003	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on several unknown dates his vehicle suddenly accelerated on its own. Customer further claims that vehicle lurched forward, revved as he was slowing down and was hard to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
193	CAMRY	2003	7/8/2003	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle's accelerator got stuck and caused an accident. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
194	CAMRY	2002	7/8/2003	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle moved forward of its own accord while she attempted to pull out of a church parking lot. Customer further claims the vehicle struck a grill, another vehicle, and landed in a ditch. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
195	CAMRY	2002	7/10/2003	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on an unknown date while her daughter was driving the vehicle and backing out of a parking space, the vehicle's gas pedal got stuck and the vehicle hit two other vehicles. Customer further claims that daughter stopped vehicle by turning it off. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
196	4RUNNER LIMITED	2003	7/18/2003	Customer's husband called regarding customer's 2003 Toyota 4Runner. Specifically, customer claims that on unknown dates when the vehicle was stopped, he had to push very hard on the brake pedal to keep the vehicle from surging forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
197	ES 300	2003	7/18/2003	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date his vehicle accelerated and hit a church wall.
198	4RUNNER LIMITED	2003	7/30/2003	Customer called regarding his 2003 Toyota 4Runner Ltd. Specifically, customer claims that on unknown dates, he had to push very hard on the brake to keep the vehicle from surging forward. Customer further claims that he had to put vehicle in neutral while stopped to prevent acceleration. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
199	CAMRY	2003	8/1/2003	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her engine suddenly accelerated in a parking lot. Customer further claims her vehicle struck two parked cars. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
200	LAND CRUISER	2003	8/27/2003	Customer called regarding her 2003 Toyota Land Cruiser. Specifically, customer claims that when in cruise control, the vehicle jerks by itself from 2000 RPM to 3000 RPM. Customer further claims that from a stop, the transmission will jerk approx. twice.
201	CAMRY	2003	8/28/2003	Customer called regarding his 2003 Camry LE. Specifically, customer claims that on unknown dates, there was a noticeable surge in the engine speed when the air conditioner was on. Customer further claims that the vehicle surged forward when stopped with his foot on the brake, and at normal highway speed, there was a noticeable surging or lurching sensation. Customer claims that the sudden acceleration occurred while the vehicle was both at a full stop and already in motion.
202	SIENNA	2004	9/10/2003	Customer called regarding 2004 Toyota Sienna. Specifically, customer claims that on unknown dates, when he braked and then put his foot back on the gas pedal, the vehicle jerked.
203	SEQUOIA	2002	9/11/2003	Customer called regarding 2002 Toyota Sequoia. Specifically, customer claims that on two unknown dates the vehicle jumped forward or lunged forward while applying brakes.
204	SIENNA	2004	9/16/2003	Customer called regarding a 2004 Toyota Sienna her husband test drove. Specifically, customer claims that on an unknown date, the vehicle's accelerator pedal stuck to the floor while her husband was driving, and that he subsequently had difficulty stopping the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
205	4Runner	2004	9/19/2003	Customer claims that the engine surges for the first 10 – 15 minutes of cold engine operation and is most noticeable when the throttle is held steady. A Field Technical Specialist concluded that the condition was likely the engine wire harness in the engine compartment. The engine wire harness was replaced and the condition was corrected.
206	RX 330	2004	9/19/2003	Customer claims that while sitting at a stoplight, the brakes gradually released and the vehicle began to creep forward. The vehicle was test-driven and the problem was duplicated. The vehicle was checked for diagnostic trouble codes, and none were found. The master cylinder was replaced and had no effect on the condition. ABS actuator was replaced and the problem was eliminated.
207	CAMRY	2002	9/26/2003	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date she was driving home and hit the brake, but it did not work.
208	CAMRY	2002	9/26/2003	Customer called regarding customer's 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates, the vehicle accelerated by itself. Customer further claims that on unknown dates the brake pedal sank to the floor.

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1	Model	Model Year	Report or claim date	Summary
209	CAMRY	2002	9/29/2003	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date while pulling into a parking space and braking, her vehicle accelerated on its own and crashed into the house next door. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
210	4RUNNER SR5	2003	9/30/2003	Customer called regarding her 2003 4Runner SR5 (V8). Specifically, customer claims that on unknown dates, unless she put a lot of pressure on the brakes, the vehicle lunged forward when coming to a stop. Customer further claims that when the air compressor was on, she had to apply a lot of pressure to the brakes to keep the vehicle from jumping forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
211	GS 300	1999	10/8/2003	Customer called regarding her 1999 Lexus GS 300. Specifically, customer claims that on unknown dates while applying the gas the vehicle lunged.
212	CAMRY	2002	10/13/2003	Customer called and claimed that on unknown dates, his wife was driving their 2002 Camry LE (V6) when the vehicle bucked. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
213	CAMRY	2003	10/16/2003	Customer called regarding customer's 2003 Toyota Camry XLE. Specifically, customer claims that on unknown dates the vehicle was surging forward and the engine was racing.
214	SEQUOIA	2002	10/21/2003	Customer called regarding customer's 2002 Toyota Sequoia. Specifically, customer claims that on an unknown date while accelerating to enter a freeway the accelerator got stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
215	ES 300	2003	10/29/2003	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on an unknown date she pressed the brake and the vehicle jumped forward and made a strange noise. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
216	CAMRY	2003	10/31/2003	Customer called regarding her 2003 Camry XLE (V6). Specifically, customer claims that on unknown dates, she experienced acceleration.
217	SIENNA	2004	11/5/2003	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates, the vehicle's gas pedal did not work properly, and that when he tried to accelerate there was a delay, then the pedal caught and he spun the tires. Customer further claims that the pedal's delay in accelerating the car properly almost caused him to be in two accidents.
218	SIENNA	2004	11/11/2003	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when giving the vehicle gas, the vehicle hesitated and then peeled out.
219	ES 300	2002	11/12/2003	Customer called regarding her Lexus ES 300. Specifically, customer claims that on an unknown date her vehicle jumped forward and struck a tree as she pulled into a parking lot. Customer further claims that the vehicle had experienced acceleration issues since she purchased the vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
220	GS 300	2000	11/21/2003	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on an unknown date he came to a stop at an intersection and the gas pedal remained stuck. Customer further claims that he had to hold down the brake with both feet to prevent lunging into car ahead. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
221	SIENNA	2004	11/21/2003	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when he tried to accelerate, the vehicle hesitated and then the vehicle lurched.
222	SIENNA	2004	11/25/2003	Customer called regarding a 2004 Toyota Sienna that he test drove. Specifically, customer claims that on an unknown date, when he accelerated the vehicle, he heard a loud sound and the vehicle would not slow down. Customer further claims that the brakes failed to stop the vehicle, causing him to run a red light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
223	SC 430	2003	12/10/2003	Customer called regarding her 2003 Lexus SC 430. Specifically, customer claims that on an unknown date her car began to go out of control and spun and hit something. An FTS inspected the vehicle.
224	SIENNA	2004	12/15/2003	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on an unknown date she was parking her vehicle when it surged into acceleration.

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1	Model	Model Year	Report or claim date	Summary
225	CAMRY SOLARA SLE	2004	12/15/2003	Customer called regarding her 2004 Toyota Camry Solara. Specifically, customer claims that on an unknown date her gas pedal stuck while she was making a U-Turn causing the car to hit a curb. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
226	CAMRY	2003	12/16/2003	Customer called regarding her 2003 Camry LE. Customer claims that on an unknown date, she put the vehicle in drive and the vehicle surged forward and made a loud rev sound. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
227	CAMRY	2004	12/19/2003	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date in 2003 he was at a stop with his foot on the brake pedal when the vehicle accelerated. Customer further claims that he was unable to stop the vehicle by using the brake. Customer states that he was then able to turn off the ignition. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
228	LS 430	2001	12/29/2003	Customer called regarding her 2001 Lexus LS 430. Specifically, customer claims that on an unknown date while driving her car jumped from 35 to 75 miles an hour. Customer further claims that she stopped just before an intersection using the emergency brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
229	ES 300	2002	12/30/2003	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on unknown dates his vehicle surged.
230	GS 300	2000	1/9/2004	Customer called regarding her 2000 Lexus GS 300. Specifically, customer claims that on unknown dates when the car was in gear and customer had her foot on the brake, the car took off. Customer further claims that she hit a tree to avoid a person. An FTS inspected the vehicle.
231	Sienna	2004	1/12/2004	A TMS associate states that the vehicle throttle would not return to idle after accelerating. A Field Technical Specialist inspected the vehicle after occurrence, and the vehicle drove properly. While it was noted that the floor mats were installed upside down, it was not believed to be the cause of the problem. No probable cause could be determined. Throttle pedal/sensor assembly recovered for further evaluation, though no fault was found to exist.
232	ES 300	2003	1/12/2004	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date his wife was pulling into a parking space when the car suddenly accelerated. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
233	4Runner	2004	1/14/2004	Customer claims that vehicle surges, especially during cold engine operation. Vehicle tested and it was confirmed that surge occurs during cold engine operation, and occurs during light throttle application while lightly accelerating. Condition ceases once vehicle is warm (approximately after 2-3 minutes). Problem rectified when brown wire E2 to throttle body was bypassed directly to engine ground.
234	GX 470	2003	1/16/2004	Customer called regarding his 2003 Lexus GX 470. Specifically, customer claims that on an unknown date the vehicle lunged forward when foot was on brake. Customer further claims that on unknown dates the car jerked and lunged when the car was coming to a stop or was at a stop. Customer claims that the sudden acceleration occurred both while the vehicle was at a stop and while in motion.
235	CAMRY	2003	1/20/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle surged forward when she applied the brakes.
236	Camry	2004	1/21/2004	Customer claims that vehicle surges during light throttle application while lightly accelerating, especially during cold engine operation. Vehicle tested and condition verified; discovered that once vehicle warms up -- after approximately 2-3 minutes -- the condition ceases. Testing showed that when brown wire E2 to throttle body was bypassed directly to engine ground, problem was rectified.
237	CAMRY	2003	1/23/2004	Customer called regarding his 2003 Toyota Camry LE. Customer claims that on unknown dates, the gas pedal jumped.
238	CAMRY	2004	1/26/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates he needed to press the gas pedal very hard before the vehicle would move forward, and that the customer then experienced lunging.
239	CAMRY	2002	1/26/2004	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on unknown dates, the vehicle accelerated forward upon application of the brakes. Customer further claims that on one occasion, when braking while pulling into a parking space, the vehicle accelerated forward and caused him to hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was at a already in motion.

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1	Model	Model Year	Report or claim date	Summary
240	TUNDRA	2003	1/28/2004	Customer called regarding his 2003 Toyota Tundra. Specifically, customer claims that on an unknown date he was backing up at 10 mph when the accelerator stuck, causing him to go through two trees, scrape the side of a building and end up between two posts. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
241	CAMRY	2003	1/29/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates the engine idled too high and the car lurched forward.
242	CAMRY	2003	1/30/2004	Customer called regarding his 2003 Toyota Camry LE. Customer claims that on unknown dates, the vehicle would lurch forward without pressing on the gas.
243	IS 300	2002	2/3/2004	Customer called regarding his 2002 Lexus IS 300. Customer claims that on unknown dates, the vehicle accelerated dangerously. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
244	ES 300	2002	2/4/2004	Customer called regarding her 2002 ES 300 4-Dr Sedan. Specifically, customer claims that on an unknown date, she was parking her vehicle when it suddenly accelerated, jumped the curb, and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
245	CAMRY	2002	2/6/2004	Customer called regarding his 2002 Camry LE. Specifically, customer claims that on an unknown date, the vehicle suddenly accelerated from 10 mph to 70-80 mph, that the brakes, transmission, and emergency brake were not responsive, and that he stopped the vehicle by driving into a snow bank. Customer further claims that on August 7, 2004, his daughter lost control of the vehicle upon applying the gas while driving up a hill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
246	LS 400	1999	2/10/2004	Customer called regarding his 1999 Lexus LS 400. Customer claims that on February 9, 2004, his wife was driving up the driveway when the vehicle accelerated, crashing into the garage. Customer claims wife had both feet on the brake pedal. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
247	ES 300	2002	2/18/2004	Customer called regarding her 2002 ES 300 4-Dr. Sedan. Specifically, customer claims that on unknown dates, the vehicle took off while accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
248	PRIUS	2004	2/23/2004	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
249	IS 300	2001	3/1/2004	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that on unknown dates, the engine stayed at maximum throttle when pressing sharply and releasing accelerator pedal. Customer further claims that the same thing happened on February 28, 2004, and customer had to drive into a lake to avoid hitting a pedestrian.
250	CAMRY	2004	3/3/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle lunged over a curb, hitting bushes and knocking down a metal gate. Customer claims that although her foot was on the gas pedal, she did not press on it enough for the vehicle to accelerate as quickly as it did. Customer claims that her bumper is damaged as a result of the incident.
251	IS 300	2004	3/4/2004	Customer called regarding his 2004 Lexus IS 300. Specifically, customer claims that on March 4, 2004, his vehicle started accelerating as he came out of a u-turn. Customer further claims he tried to press the brakes, but the car kept going forward, causing him to collide with other vehicles and after the collision, Customer heard the engine revving without his foot on the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
252	CAMRY	2003	3/4/2004	Customer called regarding his 2003 Toyota Camry LE (V6). Specifically, Customer claims that on an unknown date, while pulling his vehicle to his garage, when he was almost stopped, he took his foot off the break to step on the gas pedal and the car jumped. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
253	CAMRY	2003	3/9/2004	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date, his vehicle suddenly surged forward on acceleration and braking.
254	ES 300	2002	3/9/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on unknown dates his vehcled surged.
255	4RUNNER LIMITED	2003	3/9/2004	Customer called regarding his 2003 Toyota 4Runner Limited (V8). Specifically, Customer claims that on an unknown date his vehicle was in drive with his foot on the brake and not on the gas pedal, and the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
256	CAMRY	2003	3/10/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on multiple unknown dates, he slightly released pressure on the brakes and the vehicle has slightly surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
257	CAMRY	2003	3/10/2004	Customer called regarding her 2003 Toyota Camry SE. Specifically, customer claims that on unknown dates about once per week, when turning a corner, her vehicle would hesitate and/or surge forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
258	CAMRY	2002	3/10/2004	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on unknown dates, vehicle surged forward when accelerating.
259	CAMRY	2003	3/10/2004	Customer called regarding her 2003 Toyota Camry LE. Customer claims that vehicle has surging issue.
260	CAMRY	2003	3/10/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle was parked and instead of stopping, drove into a pole.
261	CAMRY	2002	3/10/2004	Customer's husband called regarding customer's 2002 Toyota Camry LE. Specifically, customer's husband claims that on an unknown date the prior winter, the vehicle suddenly accelerated.
262	ES 300	2003	3/10/2004	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on an unknown date her vehicle suddenly accelerated and crashed into the vehicle in front of her.
263	ES 330	2004	3/10/2004	Customer called regarding his 2004 Lexus ES 330. Customer claims that on unknown dates, his vehicle would move despite brakes being applied. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
264	CAMRY	2003	3/10/2004	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date she was in a parking lot with the car in drive and the brake on and the car surged forward. Customer further claims that she does not know how far the car lurched.
265	CAMRY	2002	3/11/2004	Customer's husband called regarding customer's 2002 Toyota Camry LE. Specifically, customer's husband claims that on unknown dates, the vehicle surged.
266	CAMRY	2002	3/11/2004	Customer called regarding her 2002 Toyota Camry LE. Specifically, Customer claims that on an unknown date, her vehicle lunged forward causing an accident.
267	CAMRY	2002	3/11/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates when his wife was driving, the throttle stuck. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
268	CAMRY	2002	3/11/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on several unknown dates, his vehicle suddenly surged forward as he pulled into parking lots. Customer further claims that at the time of the incidents he had his foot on the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
269	CAMRY	2003	3/12/2004	Customer called regarding her 2003 Toyota Camry LE. Customer claims that on unknown dates, while her husband was driving, he felt like the vehicle accelerated on its own. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
270	ES 300	2002	3/12/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on an unknown date, her vehicle suddenly surged forward.
271	GS 300	2000	3/12/2004	Customer called regarding her 2000 Lexus GS 300. Specifically, customer claims that on February 25, 2004 her car experienced an acceleration surge and took off while she was stopped at a traffic signal. Customer further claims the vehicle accelerate up to a speed of 70 MPH. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while her vehicle was at a stop.
272	CAMRY	2002	3/12/2004	Customer called regarding her 2002 Toyota Camry SE (V6). Specifically, Customer claims that on unknown dates, her vehicle surged while braking.
273	CAMRY	2003	3/12/2004	Customer called regarding 2003 Toyota Camry XLE. Specifically, customer claims that customer took vehicle to dealer six months ago because of uneven acceleration.
274	CAMRY	2003	3/15/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, the engine has surged on light throttle inputs.
275	SIENNA	2004	3/16/2004	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates his vehicle surged while accelerating.
276	ES 300	2002	3/16/2004	Customer called regarding his 2002 Lexus ES 300. Customer claims that on March 14 and 15, 2004, while stopped at lights, the vehicle wanted to pull forward. . Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
277	CAMRY	2003	3/16/2004	Customer called regarding his 2003 Toyota Camry LE. Customer claims that on unknown dates, the accelerator pedal will hesitate or accelerate.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
278	ES 300	2002	3/16/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, Customer claims that on an unknown date, she was pulling her vehicle into her garage on a wet day, put her foot on the brake and the vehicle surged forward, causing her to crash into a piece of furniture.
279	ES 300	2003	3/17/2004	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates her car has had acceleration problems and she has hit a wall.
280	CAMRY SOLARA SE	2003	3/17/2004	Customer called regarding her 2003 Toyota Camry Solara. Specifically, Customer claims that on several unknown dates while her daughter was driving the vehicle, the gas pedal has stuck.
281	CAMRY	2003	3/17/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle began experiencing a throttle control system problem.
282	CAMRY	2004	3/18/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates his brakes were making noises and were soft. Customer also states that he had acceleration concerns with the vehicle. Customer claims that at a certain speed, the vehicle jerked and then accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
283	CAMRY	2003	3/18/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on an unknown date, she was parked and her vehicle surged forward. Further, on another unknown date, she was stopped at a traffic light with her foot on the brake and the vehicle moved forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
284	CAMRY	2003	3/19/2004	Customer called regarding customer's 2003 Toyota Camry LE. Specifically, customer claims that on March 17, 2004, customer put foot on brake in parking lot and customer could not stop vehicle.
285	CAMRY	2003	3/19/2004	Customer called regarding his 2003 Toyota Camry XLE. Customer claims that on an unknown date, his vehicle surged forward when he attempted to slow it and almost caused an accident. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
286	ES 300	2002	3/19/2004	Customer called regarding customer's 2002 Lexus ES 300. Specifically, customer claims that on unknown dates the vehicle lunged forward when braking.
287	CAMRY	2003	3/19/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, her vehicle surged forward.
288	ES 300	2002	3/22/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on unknown dates his vehicle surged when coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
289	CAMRY	2002	3/23/2004	Customer called regarding her 2002 Toyota Camry XLE. Specifically, Customer claims that on unknown dates, while she tried to apply the brakes, her vehicle suddenly accelerated.
290	CAMRY	2002	3/23/2004	Customer called regarding his 2002 Toyota Camry LE. Customer claims that on an unknown date, his vehicle had sudden acceleration.
291	CAMRY	2002	3/23/2004	Customer called regarding 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle accelerated when he pressed the brake.
292	CAMRY	2002	3/24/2004	Customer called regarding her 2002 Toyota Camry XLE. Specifically, Customer claims that on unknown dates, while stopping at stoplights, her vehicle has surged forward.
293	CAMRY	2002	3/24/2004	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date her gas pedal got stuck and had to use emergency brake because brake pedal would not stop vehicle.
294	CAMRY	2003	3/25/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on an unknown date, he took his foot off the gas pedal and his vehicle continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
295	CAMRY	2003	3/25/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle accelerated in short bursts.
296	PRIUS	2004	3/25/2004	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
297	CAMRY	2003	3/26/2004	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on unknown dates her vehicle did not accelerate smoothly.
298	IS 300	2002	3/26/2004	Customer called regarding her 2002 Lexus IS 300. Specifically, customer claims that on unknown dates the gas pedal stuck.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
299	ES 330	2004	3/29/2004	Customer claims that the vehicle hesitation and jerking when accelerating from a rolling stop. Dealership Technician and FPE drove the vehicle on the freeway and in residential areas and duplicated the concern. The exact problem is unknown, but the suspected cause is ECM shifting logic takes too long to decide on which gear and how much throttle to apply during low speed acceleration demand from driver.
300	LS 430	2004	3/30/2004	Customer claims that the engine lacked power during lower speed operation and surged while driving on the freeway with cruise control. Customer further claims while the condition was intermittent, it occurred repeatedly during the previous two weeks. A technician was unable to duplicate the condition. Analysis indicated that the fuel pump assembly was malfunctioning, causing intermittent lack of engine power, surging, and stalling due to low fuel pressure. Fuel Pump assembly was replaced and it corrected the condition.
301	RX 330	2004	3/30/2004	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date, his wife was driving the vehicle when it surged in reverse, causing her to crash into tree.
302	GS 300	2003	3/30/2004	Customer called regarding his 2003 Lexus GS 300. Specifically, customer claims that on unknown dates, his vehicle intermittently surged and lurched forward. Customer further claims there is a clunking noise coming from the bottom of the vehicle when it is moving slow.
303	CAMRY	2002	3/31/2004	Customer called regarding her 2002 Toyota Camry LE. Specifically, Customer claims that on an unknown date, the gas pedal stuck and the brakes did not stop the vehicle. Customer further states she applied the emergency brake to stop the vehicle, but hit the vehicle in front of her.
304	CAMRY	2003	4/1/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, he has had to step very hard on the brakes. Customer further claims that on unknown dates, his vehicle has surged forward. Customer claims sudden acceleration occurred when the vehicle was already in motion.
305	CAMRY	2003	4/1/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, vehicle has surged when driving 39-42 mph. Customer claims that the sudden acceleration occurred when vehicle was already in motion.
306	CAMRY	2003	4/1/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on March 31, 2004 when she initially put the car in drive, the vehicle experienced a sudden high acceleration. Customer claims this sudden acceleration occurred while the vehicle was at a stop.
307	CAMRY	2003	4/1/2004	Insurance company called on behalf of customer. Specifically, agent claims that on an unknown date, the throttle stuck on insured's vehicle causing loss of control of vehicle and a collision with another vehicle. Agent claims that the sudden acceleration occurred while the vehicle was already in motion.
308	TACOMA	2004	4/5/2004	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims , on unknown dates, the accelerator is sticking on his vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
309	ES 300	2002	4/6/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, Customer claims that on March 23, 2004, his wife was slowly pulling into a parking lot and the vehicle did not stop, rolling over a curb and striking a tree. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
310	RX 330	2004	4/6/2004	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on unknown dates his car accelerated out of the driveway in reverse without pressing the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
311	ES 300	2002	4/7/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, Customer claims that on an unknown date, his wife was driving his vehicle in cruise control when suddenly the vehicle took off, crossing a median and crashing. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
312	ES 300	2002	4/8/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, Customer claims that on unknown dates, her vehicle has surged and lurched forward.
313	CAMRY	2002	4/8/2004	Customer called regarding her 2002 Toyota Camry SE. Specifically, customer claims that on two unknown dates her car suddenly accelerated on its own.
314	GS 300	1999	4/13/2004	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on unknown dates the vehicle surged forward when at a stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
315	ES 300	2003	4/13/2004	Customer called regarding friend's 2003 Lexus ES 300. Specifically, customer claims that on an unknown date vehicle surged forward while braking and friend hit a post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
316	ES 300	2002	4/14/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, Customer claims that on an unknown date, she was at a stop when her vehicle surged forward and struck the vehicle in front of her. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
317	CAMRY	2002	4/16/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on three unknown dates, customer pressed on brakes when coming to a light and the vehicle accelerated very hard. Customer further claims that he had to stand on the brakes to prevent the car from hitting the vehicle in front of him. The only way to stop the car was to turn it off. An FTS inspected vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
318	CAMRY	2003	4/16/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on an unknown date, he was trying to bring his vehicle to a stop and the vehicle suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
319	CAMRY	2003	4/16/2004	Customer called regarding 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date customer was pulling into driveway at about 5 mph when vehicle accelerated by itself. Customer further claims that customer crashed into another vehicle and a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
320	HIGHLANDER	2004	4/21/2004	Customer called regarding is 2004 Toyota Highlander. Specifically, customer claims that he is concerned with his engine because the vehicle does not accelerate properly. Customer further claims that the vehicle is lurching forward and that the gears do not shift when he tries to accelerate.
321	SEQUOIA	2004	4/22/2004	Customer emailed regarding his 2004 Toyota Sequoia. Specifically, customer claims that when he starts the vehicle and slightly presses the accelerator, the engine roars. While the engine is roaring, the car seems to hesitate, but when the roaring ends, the vehicle junks forward.
322	PRIUS	2004	4/23/2004	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates the engine surged when it was cold, but the vehicle did not move.
323	LS 400	2000	4/23/2004	Customer called regarding his 2000 Lexus LS 400. Specifically, Customer claims that on unknown dates, when he was stopped or just starting to move forward, his vehicle jumped forward or suddenly surged. Customer claims that the sudden acceleration has occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
324	SEQUOIA	2003	4/26/2004	Customer called regarding customer's 2003 Toyota Sequoia. Specifically, customer claims that on several unknown dates, when leaving a red light or accelerating out of a turn the vehicle lunged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
325	TUNDRA	2003	4/27/2004	Customer called regarding his 2003 Toyota Tundra SR5. Specifically, Customer claims that on unknown dates, while he was at a stop with the brake pedal not depressed hard, his idle speed has been very high and the vehicle has lurched forward. Customer further states that when he has been driving at 20-35 mph, his vehicle has lurched. Customer claims the sudden acceleration has occurred both when the vehicle was at a full stop and when the vehicle was already in motion.
326	CAMRY	2003	4/28/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on April 28, 2004, customer was slowing down to make a turn when the vehicle started to accelerate. Customer further claims that customer had to hit brake and then vehicle slowed down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
327	CAMRY	2004	5/3/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates in 2004 his car lurched forward and revved three (3) times in two (2) weeks. Customer further claims that this only happened when he came to a red light and then stoped the vehicle, at which point the vehicle lurched forward approximately three (3) feet. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
328	TUNDRA	2002	5/3/2004	Customer's wife called regarding customer's 2002 Toyota Tundra SR5. Specifically, Customer's wife claims that on unknown dates, the vehicle surged up to 15 mph when she did not have her foot on the gas pedal. Customer claims the sudden acceleration occurred when the car was at a full stop.
329	PRIUS	2004	5/5/2004	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
330	SIENNA	2004	5/5/2004	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on an unknown date his wife was driving the vehicle on the freeway when the throttle became stuck and the brakes would not slow the vehicle.
331	CAMRY	2004	5/6/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates he has experienced an engine surge three (3) times. Customer further claims that the problem was intermittent.
332	CAMRY	2002	5/11/2004	Customer called regarding customer's 2002 Toyota camry LE. Specifically, customer claims that on dates including July 15, 2004 and July 21, 2004, customer's vehicle surged forward during braking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
333	RX 330	2004	5/12/2004	Customer claims that while sitting at a stoplight, the brakes gradually release and the vehicle begins to creep forward. The vehicle was test-driven and the problem was duplicated. The vehicle was checked for diagnostic trouble codes, and none were found. The master cylinder and booster assembly were replaced and had no effect on the condition. ABS actuator was replaced and the problem was eliminated.
334	CAMRY	2003	5/13/2004	Customer called regarding his 2003 Toyota Camry XLE. Specifically, Customer claims that on unknown dates, when he was driving at low speed, the vehicle lurched forward. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
335	IS 300	2001	5/13/2004	Dealer called regarding customer's 2001 Lexus IS 300. Specifically, dealer states that on unknown dates customer was driving vehicle and it would not stop. Dealer further claims that customer pulled off to side of road and engine was revving high. Customer turned engine off and it continued to rev, then stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
336	ES 300	2002	5/13/2004	Customer called regarding her 2002 Lexus ES 300. Customer had a concern with vehicle surging.
337	CAMRY	2003	5/14/2004	Insurer called on behalf of customer regarding her 2003 Toyota Camry XLE. Specifically, insurer claims that on an unknown date, customer's vehicle accelerated when brake was pressed causing her to crash into a building.
338	CAMRY	2002	5/18/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle accelerator surged when braking abruptly. Customer further claims that the vehicle kicks in and lurches forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
339	CAMRY	2002	5/19/2004	Woman called on behalf of customer regarding his 2002 Toyota Camry LE. Specifically, customer claims that on ten unknown dates, his vehicle took off on its own while in reverse causing injuries to people in the parking lot. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
340	CAMRY	2004	5/20/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that her daughter was driving the vehicle and pressed on the brake but the vehicle surged forward. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
341	RX 330	2004	5/21/2004	Customer claims that while sitting at a stoplight, the brakes gradually release and the vehicle begins to creep forward. The vehicle was test-driven and the problem was duplicated. The vehicle was checked for diagnostic trouble codes, and none were found. The master cylinder was replaced and had no effect on the condition. ABS actuator was replaced and the problem was eliminated.
342	ES 300	2002	5/24/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, Customer claims that on unknown dates, his vehicle surged while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
343	CAMRY	2002	5/24/2004	Customer called regarding hia 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle suddenly surged forward. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
344	CAMRY	2002	5/24/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on three occasions including December 8, 2003, he was driving when his vehicle suddenly surged. Customer further claims that on one occasion he hit a pick up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
345	LS 400	2000	5/25/2004	Customer called regarding his 2000 Lexus LS 400. Specifically, Customer claims that on three unknown dates, his vehicle suddenly accelerated from a stopped position. Customer further claims that on each occasion he had to jump on the brakes to make the vehicle stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
346	CAMRY	2004	5/25/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown her gas pedal stuck. Customer further claims that when she stopped at a stop sign and pressed on the gas, the vehicle was slow to take off. Customer states that she experienced an instance in which she traveled down a hill and prepared to stop at a stop light but the vehicle would not stop. Customer claims that the brakes were not responding and that the RPM jumped up to 7. Customer claims that she had to put the vehicle in park to stop.
347	LS 430	2001	5/26/2004	Customer called regarding his 2001 Lexus LS 430. Specifically, Customer claims that on an unknown date, his vehicle's accelerator stuck and the vehicle didn't stop until the engine was cut off, causing it to crash into a garage.
348	SIENNA	2004	6/2/2004	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates the vehicle would not properly down shift and the vehicle sometimes accelerated by itself. A Field Technical Specialist (FTS) inspected the vehicle.
349	Camry	2004	6/9/2004	Vehicle surges when driving under light load. No DTC's stored in the ECM. Inspected fuel pressure, inspected operation of mass airflow, exchanged ECM with KGU, and there were no change in conditions. Disconnected air/fuel ratio sensor and problem went away.
350	LS 430	2004	6/9/2004	Customer called regarding his 2004 Lexus LS 430. Specifically, customer claims that on May 31, 2004, he was at an intersection with his foot on brake when the vehicle started to shutter as if it was going to stall and then lurched forward, although it was not able to drive with his foot on the brake. Customer further claims that the same incident happened two more times that day, with the vehicle stalling after each occurrence. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
351	TUNDRA	2002	6/9/2004	Customer called regarding his 2002 Toyota Tundra SR5. Specifically, customer claims that on an unknown date, his vehicle surged.
352	CAMRY	2003	6/10/2004	Customer called regarding his 2003 Toyota Camry XLE. Specifically, Customer claims that on unknown dates, in cold weather, his vehicle surged for the first 10-15 miles while the engine was warming. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
353	CAMRY	2003	6/15/2004	Customer called regarding his 2003 Toyota Camry LE. Customer claims that on three occasions on unknown dates, when he pressed the brake, the vehicle accelerated.
354	CAMRY	2002	6/17/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, Customer claims that on an unknown date, he was driving the vehicle when it accelerated on its own, causing him to have to shift into park while the vehicle was going 70 mph in order to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
355	ES 300	2002	6/17/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, Customer claims that on unknown dates his vehicle was at a stop and suddenly lurched forward. Customer further claims that the vehicle lurched when the Air Conditioning was on. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
356	CAMRY	2002	6/22/2004	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on unknown dates his vehicle will rev and then surgewhile he is driving slowly with this foot on the brake, one time causing him to hit an object.
357	CAMRY	2002	6/23/2004	Customer called regarding her 2002 Toyota Camry LE. Specifically, Customer claims that on unknown dates her vehicle surged.
358	CAMRY	2003	6/25/2004	Customer called regarding her 2003 Toyota Camry SE. Specifically, customer claims that on unknown dates, her vehicle jerked upon acceleration.
359	GS 300	1999	6/28/2004	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on an unknown date, when he removed his foot from the acceleration pedal the vehicle continued accelerating until he put the vehicle in neutral. Customer further claims that the same incident happened three times. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
360	Camry	2004	6/29/2004	Customer experienced intermittent hesitation in throttle response during up-shift and on acceleration after deceleration. Customer further claims when the vehicle does not respond, the vehicle moves strongly forward. Technical Service Bulletin (TSB) – TC002-03 was performed.
361	CAMRY	2003	6/30/2004	Customer called regarding his 2003 Toyota Camry SE (V6). Specifically, Customer claims that on unknown dates, his vehicle surged forward when stopping. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
362	CAMRY	2003	7/1/2004	Customer called regarding her 2003 Camry XLE (V6). Specifically, Customer claims that on unknown dates, her vehicle accelerated on its own.
363	SEQUOIA	2001	7/6/2004	Customer called regarding her 2001 Toyota Sequoia SR5. Specifically, customer claims that on unknown dates, her vehicle experienced unintended acceleration.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
364	CAMRY	2002	7/7/2004	Customer called regarding his 2002 Toyota Camry XLE. Specifically, Customer claims that on five unknown dates, he was driving his vehicle slowly with his foot on the brake when the engine suddenly revved and the vehicle surged. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
365	RX 330	2004	7/8/2004	Customer claims that at all engine speeds the vehicle will surge, approximately 100 RPM every 3-5 seconds, and that a puffing sound in the air filter housing accompanies the surge. Vehicle inspected and checked, and cylinder heads removed. Wiring harness swapped out and condition was corrected.
366	SIENNA	2004	7/8/2004	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates his vehicle raced off when he applied a little pressure on the accelerator pedal.
367	CAMRY SOLARA SE	2004	7/9/2004	Customer called regarding his 2004 Toyota Camry Solara. Specifically customer claims that on July 8, 2004 he was involved in an accident after his vehicle suddenly accelerated after he released the gas pedal. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
368	ES 330	2004	7/13/2004	Customer called regarding his 2004 Lexus ES 330. Specifically, Customer claims that on an unknown date, his vehicle unexpectedly accelerated causing an accident. Customer further claims that after the accident, he had his foot on the brake and the engine continued to rev.
369	ES 330	2004	7/13/2004	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, her vehicle had excessive acceleration with no low end performance.
370	CAMRY	2004	7/14/2004	Customer's son called regarding his parents' 2004 Toyota Camry LE. Specifically, customer claims that on an unknown date their vehicle unintentionally accelerated, causing to them to hit another vehicle. An FTS inspected the vehicle.
371	TUNDRA	2003	7/19/2004	Customer called regarding his 2003 Toyota Tundra SR5. Specifically, customer claims that on unknown dates, his vehicle does not adequately decelerate after the brake is applied. Customer claims it is as if the cruise control is enabled. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
372	Scion tC	2005	7/20/2004	Customer claims that while driving at highway speeds, when the A/C compressor engages, there is an engine surge or bump that is felt through the floorboard at the driver's feet. Confirmed that while driving at highway speeds, if A/C button is turned off, and then turned on, can feel the surge/bump. The cause is unknown. No repairs were made.
373	CAMRY	2003	7/23/2004	Customer called regarding her 2003 Camry XLE (V6). Specifically, Customer claims that on an unknown date, customer had her foot on the brake pedal when the engine revved, causing the vehicle to crash.
374	RX 330	2004	7/26/2004	Customer called regarding his 2004 Lexus RX 330. Specifically, Customer claims that on unknown dates, his vehicle accelerated abruptly and that the vehicle shifted up and down on its own while the car was moving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
375	CAMRY	2004	7/27/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates when he pressed on the brake pedal, the vehicle surged ahead. Customer states that this happened three (3) times.
376	CAMRY	2003	8/2/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, Customer claims that on two dates in September and October of 2003, his vehicle surged.
377	GX 470	2004	8/2/2004	Customer called regarding his 2004 Lexus GX 470. Specifically, Customer claims that on unknown dates, his vehicle accelerated without him putting his foot on the gas. Customer further claims that the vehicle revs up.
378	CAMRY	2002	8/2/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, Customer claims that on April 13, 2004, his vehicle suddenly surged forward while he was coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
379	ES 300	2002	8/2/2004	Customer called regarding his 2002 Lexus ES 300. Specifically, Customer claims that on unknown dates, the car jerked and accelerated when he slowed it to make a turn. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
380	RX 330	2004	8/4/2004	Insurer called on behalf of customer regarding customer's 2004 Lexus RX 330. Specifically, insurer claims that on an unknown date vehicle exhibited unintended acceleration while in motion and ultimately crashed.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
381	CAMRY	2002	8/9/2004	Customer called regarding his 2002 Toyota Camry SE. Specifically, customer claims that on an unknown series of dates his vehicle surged forward. Customer further claims that on an unknown date, one of these surges resulted in the vehicle striking a concrete post.
382	ES 300	2003	8/9/2004	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates vehicle exhibited surging while the car is in motion.
383	HIGHLANDER	2004	8/10/2004	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on an unknown date, his vehicle got stuck and both the check engine light and VSC light came on. Customer further claims that he kept pressing the accelerator, and the vehicle suddenly engaged and crashed into a wall.
384	CAMRY	2004	8/12/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was pulling into a parking space when her vehicle surged forward. Customer further claims that the vehicle crashed into a building as a result of the incident, causing damage to the building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
385	CAMRY	2004	8/12/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was driving into her driveway and parking her vehicle when her vehicle surged forward upon application of the brakes. Customer further claims that her vehicle caused damage to her garage.
386	ES 330	2004	8/13/2004	Customer's son called regarding his parents' 2004 Lexus ES 330. Specifically, son claims that on an unknown date vehicle exhibited jerking and lurching while in motion and that he narrowly avoided an accident.
387	ES 300	2002	8/16/2004	Customer claims that when coasting or braking down to less than 15mph. Customer further claims that when reaccelerating, a hesitation is felt before the vehicle begins to accelerate. Customer claims that the vehicle jerks when accelerating from a rolling stop. The vehicle was driven with the scan tool and a snapshot was taken while duplicating the condition. No repairs were performed and the vehicle was operating as designed.
388	GX 470	2003	8/16/2004	Customer called regarding her 2003 Lexus GX 470. Specifically, customer claims that on unknown dates vehicle exhibited lunging and lurching when coming to a stop as well as while resting at a full stop. An FTS inspected the vehicle.
389	RX 330	2004	8/23/2004	Customer states that the vehicle jerked when accelerating after stop. The vehicle was road tested. The probable cause of the problem was found to be the EUC logic. No repairs were made.
390	CAMRY	2003	8/23/2004	Customer called regarding her 2003 Toyota Camry SE. Specifically, customer claims that on unknown dates vehicle exhibited jerking.
391	CAMRY	2004	8/24/2004	Customer called regarding her 2004 Toyota Camry LE (V6). Specifically, customer claims that on unknown dates, her vehicle surged forward and did not function smoothly when she tried to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
392	PRIUS	2004	8/24/2004	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates when the vehicle was sitting idle, the engine kicked on and the vehicle seemed to lunge forward. Customer further claims that there were problems with the GPS, the stereo and other cosmetic issues. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
393	CAMRY	2004	8/26/2004	Customer called regarding her 2004 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle surged forward, causing her to crash into a wall. Customer further claims that at the time of the accident she had her foot on the brake pedal. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
394	CAMRY	2004	8/26/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was turning to park when her vehicle surged forward. Customer claims that the sudden acceleration occurred while her vehicle was already in motion.
395	SC 400	1998	8/26/2004	Customer called regarding his 1998 Lexus SC 400. Specifically, customer claims that on August 25, 2004 his vehicle accelerated on its own leading to an accident. Customer further claims that on August 26, 2004, the car again accelerated on its own.
396	PRIUS	2004	8/27/2004	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates the engine did not shut off completely at a stop and the vehicle jerked several times. Customer further claims that there were problems with seeing out the rear window, the dashboard vibrated, and the seat did not go completely forward.
397	CAMRY SOLARA SE	2004	9/1/2004	Customer called regarding her 2004 Toyota Camry Solara SE. Specifically, customer claims that on unknown dates vehicle exhibited stalling and surging.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
398	CAMRY	2003	9/1/2004	Customer called regarding her 2003 Toyota Camry SE. Specifically, customer claims that on an unknown date vehicle surged forward and struck a bench. Customer claims that the surging occurred while the vehicle was in motion.
399	LS 430	2004	9/2/2004	Customer's son called regarding his 2004 Lexus LS 430. Specifically, customer's son claims that on unknown dates, when slowing down to about 10 MPH and then trying to accelerate, the vehicle jerked forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
400	CAMRY	2002	9/2/2004	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration.
401	ES 330	2004	9/2/2004	Customer called regarding her 2004 Lexus ES 330. Customer claims that on an unknown date, while driving in cruise control, the vehicle surged from 60 to 80 MPH without pushing the accelerator. Customer claims that this has happened twice. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
402	CAMRY	2003	9/2/2004	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on unknown dates vehicle exhibited lunging while the car was in motion.
403	TACOMA	2004	9/2/2004	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims, on unknown dates, that the gas pedal seemed to have the gas cut out then jump ahead at low speeds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
404	ES 300	2002	9/7/2004	Customer claims that the vehicle accelerated on its own and stepping on the brake would not stop the vehicle. A diagnostic was run, and the problem was immediately identifiable. Customer was using a hard molded carpet floor mat with a smooth rubber bottom.
405	CAMRY	2003	9/10/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle surged forward when customer pressed brake pedal, causing the vehicle to crash into a brick wall. An FTS inspected the vehicle.
406	LS 400	2000	9/13/2004	Customer called regarding his 2000 Lexus LS 400. Specifically, customer claims that on unknown dates vehicle surged forward both while at a full stop and while in motion.
407	CAMRY	2004	9/13/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates when he stepped on the gas, he experienced a slight hesitation after which the car surged forward.
408	HIGHLANDER	2004	9/13/2004	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on unknown dates, her vehicle dropped in speed when she applied the breaks at 40-50 mph, causing her almost to have an accident. Customer further claims that her vehicle jumped in acceleration from 0 mph. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
409	GS 300	2000	9/14/2004	Customer called regarding his 2000 Lexus GS 300. Specifically, customer claims that on an unknown date vehicle exhibited unintended acceleration while the car was in motion.
410	ES 330	2005	9/16/2004	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on an unknown date vehicle lunged forward while at a full stop and hit a pole.
411	CAMRY	2003	9/20/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date when he put his foot on the brake, the car instead accelerated.
412	LS 430	2002	9/24/2004	Customer called regarding his 2002 Lexus LS 430. Specifically, customer claims that on unknown dates vehicle exhibited high idling and unintended acceleration upon shifting the vehicle into reverse.
413	GX 470	2004	9/27/2004	Customer called regarding his 2004 Lexus GX 470. Specifically, customer claims that on unknown dates vehicle surged while at a full stop.
414	CAMRY	2003	9/27/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle surged forward upon depressing the accelerator.
415	SC 300	2000	9/30/2004	Customer called regarding her 2000 Lexus SC 300. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration while in motion, causing the vehicle to crash into a house. An FTS inspected the vehicle.
416	CAMRY	2004	10/4/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that she as backing the vehicle out of the driveway when the vehicle began speeding up and hit a gate. Customer states that her gas pedal became stuck during the incident. Customer further claims that this problem has happened before. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
417	RX 330	2005	10/4/2004	Customer called regarding her 2005 Lexus RX 330. Specifically, customer claims that on an unknown day, her vehicle took off while stopped at a stop light, causing her to collide with a car in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
418	CAMRY	2004	10/5/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates when the gas pedal was applied, the vehicle jumped and surged.
419	CAMRY	2002	10/6/2004	Customer's father called regarding daughter's 2002 Toyota Camry LE. Specifically, father claims that on unknown dates vehicle surged forward.
420	SIENNA	2004	10/6/2004	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when stopping and starting his vehicle accelerated too quickly and that his rear tires spun.
421	TACOMA	2004	10/6/2004	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims, on unknown dates, that sometimes while he comes to a stop, the vehicle accelerates suddenly. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
422	CAMRY	2004	10/8/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates he was experiencing a concern with the accelerator pedal. Customer believes that the accelerator jerked. Customer states that when he was at a stop sign and accelerated, the vehicle lurched and the acceleration was not smooth.
423	CAMRY	2005	10/11/2004	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, his vehicle's throttle goes by itself occasionally.
424	ES 300	2002	10/12/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration while in motion, causing vehicle to strike another moving car.
425	TACOMA	2004	10/12/2004	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims that, on unknown dates, he experienced sudden acceleration while driving and has to shift gears to slow the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
426	CAMRY	2004	10/13/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date without pressing on the gas pedal, the vehicle rapidly accelerated. Customer further claims that before he could get his foot on the brake pedal, the vehicle hit a building. Customer claims that both his vehicle and the building were damaged.
427	ES 300	2003	10/13/2004	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on an unknown series of dates the car will jerk forward and accelerate suddenly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
428	LS 430	2001	10/13/2004	Customer called regarding her 2001 Lexus LS 430. Specifically, customer claims that on October 1, 2004 vehicle's gas pedal got stuck while parked, causing it to strike a pole and wall.
429	TUNDRA	2000	10/13/2004	Customer called regarding her 2000 Toyota Tundra 4X4. Specifically, customer claims that on unknown dates vehicle surged.
430	MATRIX	2005	10/14/2004	Customer called regarding her 2005 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates, her vehicle experienced unintended acceleration.
431	RX 330	2004	10/22/2004	Customer called regarding her 2004 Lexus RX 330. Specifically, customer claims that on October 22, 2004 vehicle jumped while pulling into parking space, causing vehicle to strike a building.
432	LS 430	2004	10/22/2004	Customer called regarding his 2004 Lexus LS 430. Specifically, customer claims that on unknown dates vehicle jumped and lurched, both when accelerating and when coming to a full stop. An FTS inspected the vehicle.
433	CAMRY	2004	10/27/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date in 2004 his wife was attempting to park the vehicle when it lurched forward, went over the parking block and hit a wall. Customer further claims that on unknown dates the surging concern has happened before. An FTS inspected the vehicle.
434	PRIUS	2004	10/27/2004	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
435	CAMRY	2002	10/27/2004	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle surged while in motion.
436	ES 330	2004	10/28/2004	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date the vehicle exhibited unintended acceleration while parking, causing the vehicle to strike a column of bricks.
437	ES 300	2002	10/28/2004	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on unknown dates vehicle lunged forward while in both forward and reverse.
438	CAMRY	2002	11/2/2004	Customer's wife called regarding her 2002 Toyota Camry LE. Specifically, wife claims that on unknown dates vehicle surged while attempting to park.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
439	SIENNA	2005	11/2/2004	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on unknown dates the vehicle lunged forward when driving at 3 mph and the tachometer went crazy. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
440	ES 330	2004	11/3/2004	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on unknown dates the vehicle exhibited unintended acceleration while in motion.
441	ES 300	2002	11/3/2004	Insurance company called on behalf of customer regarding 2002 Lexus ES 300. Specifically, customer claims that on October 25, 2004, his vehicle lunged while he was backing out. Customer further claims this resulted in an accident, totaling the vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
442	CAMRY	2003	11/5/2004	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle exhibited accelerator problem.
443	CAMRY	2004	11/5/2004	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates he got surges of power when driving his vehicle. Customer further claims that his vehicle seemed to jolt ahead.
444	CAMRY	2005	11/5/2004	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, he feels like his vehicle has a life of its own when it comes to the gas pedal.
445	GS 300	1999	11/8/2004	Customer called regarding his 1999 Lexus GS 300. Customer claims that an unknown date, the vehicle went to 700 RPM and the driver had to swerve to avoid other vehicles. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
446	ES 300	2002	11/8/2004	Customer's colleague called regarding customer's 2002 Lexus ES 300. Specifically, customer claims that on October 27, 2004 vehicle unintentionally accelerated while the vehicle was moving in reverse, causing it to strike another truck.
447	CAMRY	2002	11/9/2004	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date her vehicle lurched forward while she pulled into a handicapped parking spot. Customer further claims the vehicle struck a concrete pole. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
448	CAMRY	2003	11/10/2004	Customer's wife called regarding his 2003 Toyota Camry LE. Specifically, wife claims that on November 9, 2004 vehicle surged while turning at in intersection.
449	CAMRY	2005	11/12/2004	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while parking, she experienced unintended acceleration. Customer claims that the vehicle surged forward and struck a wooden ramp. Customer claims that her foot was on the brake pedal.
450	LS 430	2004	11/19/2004	Customer called regarding his 2004 Lexus LS 430. Specifically, customer claims that on unknown dates vehicle exhibited high idling and surging.
451	TACOMA	2004	11/19/2004	Customer called regarding his 2004 Toyota Tacoma Prerunner. Customer claims that on unknown dates, the vehicle jumped from 750 to 1000 RPM forcing him to brake harder when stopping. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
452	SEQUOIA	2002	11/23/2004	Customer called regarding her 2002 Toyota Sequoia SR5. Specifically, customer claims that on an unknown date the vehicle surged forward while at a full stop, causing it to crash into house. An FTS inspection was scheduled.
453	CAMRY	2002	11/24/2004	Customer called regarding her 2002 Toyota Camry SE. Specifically, customer claims that on an unknown date, while leaving a parking lot, vehicle surged forward and struck another car. An FTS inspected the vehicle.
454	COROLLA	2005	11/29/2004	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated and surged forward while she was at a stop sign, causing her to run into a concrete driveway. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
455	ES 330	2005	12/1/2004	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates vehicle surged when downshifting and accelerator became stuck at a stop light.
456	PRIUS	2002	12/1/2004	Customer called regarding his 2002 Toyota Prius 4-Door. Specifically, customer claims that on unknown dates vehicle surged when transferring foot from accelerator to brake while in motion.
457	CAMRY	2005	12/2/2004	Customer called regarding her 2005 Camry XLE. Specifically, customer claims that on several unknown dates, her vehicle surged forward. On one occasion it hit a wall, causing damage to the bumper.

#95812

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
458	GS 300	2002	12/2/2004	Customer called regarding his 2002 Lexus GS 300. Specifically, customer claims that on unknown date vehicle exhibited unintended acceleration while in motion on the highway.
459	CAMRY	2004	12/2/2004	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, her vehicle's tire exploded and her vehicle surged forward. Customer further claims that the vehicle continued to accelerate, hitting the road's median and some trees.
460	COROLLA	2005	12/7/2004	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on December 6, 2004 the vehicle, accelerated independently and made a popping noise when his wife made a right turn at a light.
461	Tacoma	2005	12/9/2004	Customer claims that engine RPM fluctuates or does not drop quickly when throttle is not applied. FPE test-drove the vehicle with the dealer technician, and customer complaint could not be confirmed. Condition can be duplicated by accelerating full throttle (4th gear) to above 4000 RPM then releasing the throttle. Customer's vehicle drivability and performance were consistent with other 2005 Tacoma's equipped with 2TR engine. No action was taken for repair.
462	HIGHLANDER	2005	12/10/2004	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on an unknown date, the vehicle accelerated when he hit the brake. Customer claims that no injuries or damage resulted from the incident.
463	CAMRY SOLARA SLE	2004	12/10/2004	Customer called regarding her 2004 Toyota Camry Solara SLE. Specifically, customer claims that on an unknown date vehicle exhibited unintentional acceleration while parking, causing it to strike another parked vehicle. Customer further claims that her foot was on the brake pedal at the time of the accident.
464	SIENNA	2004	12/10/2004	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when accelerating her vehicle acted as if it was going to stall and then lurched or jumped forward.
465	CAMRY	2002	12/14/2004	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date vehicle unintentionally accelerated backwards while attempting to park, causing it to strike a cement piling. Customer further claims her foot was on the brake for the duration. An FTS inspected the vehicle.
466	CAMRY	2003	12/14/2004	Customer called regarding 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date vehicle jumped curb while attempting to park, causing it to strike a fence. An FTS inspected the vehicle.
467	CAMRY	2005	12/15/2004	Customer claims that on 2005 Toyota Camry. Specifically, customer claims that on that his vehicle surged while pulling into a parking space.
468	ES 300	2003	12/16/2004	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date the vehicle exhibited unintentional acceleration attempting to park, causing it to strike a retaining wall.
469	CAMRY SOLARA SLE	2004	12/16/2004	Customer called regarding her 2004 Toyota Camry SLE. Customer states that on an unknown date, the accelerator stuck, causing an accident.
470	CAMRY	2002	12/17/2004	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that October 6, 2004, his vehicle suddenly accelerated while pulling into a parking space. The customer further claims that his vehicle then struck a tree and suffered substantial damages. Customer further claims a similar incident occurred on December 4, 2004. An FTS examined the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
471	TUNDRA	2005	12/20/2004	Customer called regarding his 2005 Toyota Tundra. Specifically, the customer claims, on unknown dates, the vehicle, when driving, while changing gears, the vehicle starts to accelerate on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
472	SEQUOIA	2005	12/22/2004	Customer called regarding his 2005 Toyota Sequoia. Specifically, customer claims that his vehicle continues to move forward when he is stopped at a stop sign or stop light with his foot on the brakes.
473	COROLLA	2005	12/23/2004	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle idled very high and the RPM were at 1750 to 2000 when idling.
474	CAMRY	2003	12/29/2004	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date vehicle surged while attempting to park, causing it to strike a building. An FTS inspected the vehicle.
475	CAMRY	2003	1/3/2005	Customer's husband called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on three unknown dates vehicle surged while in motion, causing two accidents. An FTS inspected the vehicle.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
476	PRIUS	2005	1/3/2005	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle surged. Customer further claims that the gas mileage was lower than stated on the window sticker, the climate control was not accessible on the steering wheel and she could not see the front of the vehicle to parallel park.
477	SEQUOIA	2005	1/4/2005	Customer called regarding his 2005 Toyota Sequoia. Specifically, customer claims that on unknown dates his vehicle revved very high and jumped after shifting the vehicle into gear.
478	IS 300	2003	1/4/2005	Customer called regarding his 2003 Lexus IS 300. Specifically, customer claims that on an unknown date vehicle exhibited unintentional acceleration in a parking lot, causing it to strike two parked cars.
479	CAMRY	2005	1/6/2005	Customer's daughter called regarding customer's 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates, the throttle of her mother's vehicle became stuck.
480	SIENNA	2004	1/10/2005	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when she pressed the gas pedal the vehicle hesitated and then lunged forward.
481	CAMRY	2004	1/10/2005	Customer wrote regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, he put his vehicle into drive, after which it raced uncontrollably, causing the vehicle to lurch forward and hit a parked car and then a fence.
482	CAMRY	2004	1/10/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that in November 2009 his wife was driving the vehicle and was pulling into a parking spot when the vehicle suddenly accelerated, hitting another vehicle. Customer further claims that on December 19, 2009, the customer was traveling at approximately 60 miles per hour and was exiting the highway when the vehicle accelerated approximately 10 to 15 miles per hour on its own. Customer states that he was able to control the vehicle in order to avoid an accident. Customer claims that sudden the acceleration occurred while the vehicle was already in motion.
483	CAMRY	2003	1/11/2005	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her vehicle picked up speed and she hit 2 palm trees. Customer further claims that brakes and gas pedal malfunctioned. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
484	PRIUS	2005	1/12/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on January 11, 2005, the check engine light was on and the vehicle was "bucking."
485	CAMRY	2005	1/13/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 11, 2004, while traveling on cruise control at 70 mph, she accelerated to 80 mph and the customer hit the brake to stop the acceleration. On another incident, on January 3, 2005, she tried to stop at a light and the vehicle would not stop until she turned off the engine.
486	4RUNNER	2004	1/13/2005	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle surged forward after braking and has done this since he purchased the vehicle.
487	4RUNNER	2004	1/14/2005	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates she almost got into accidents because of unintended acceleration. Customer further claims that in one instance, she was approaching a stop light when the vehicle continued to roll and would not stop. Customer states that in another instance, she was attempting to park the vehicle but could not stop the vehicle. Customer then states that at one point, she was trying to stop the vehicle at a toll booth but could not stop the vehicle.
488	HIGHLANDER	2005	1/18/2005	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on January 14, 2005, she experienced surging in her vehicle as she was driving. Customer further claims that she has experienced this issue three times.
489	CAMRY	2004	1/18/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates his brakes felt soft. Customer further claims that he was in an accident while attempting to park the vehicle. Customer claims that during this incident, the vehicle surged forward while his foot was on the brake and hit another parked vehicle.
490	CAMRY	2002	1/18/2005	Customer called regarding her 2002 Toyota Camry LE. Specifically customer claims that on an unknown date her vehicle accelerated suddenly while in drive. Customer further claims the vehicle jerked forward and hit a concrete wall and rail. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.

#95814

IR13_Complaints_and_Field_Repor

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
491	RAV 4	2004	1/19/2005	Customer's husband called regarding her 2004 Toyota RAV 4 4 WD. Customer claims that on January 19, 2005 the vehicle surged forward while in the drive and struck a brick wall. Customer further claims the engine began to rev up while the car was in drive. Customers further claims the brakes did not react. An FTS inspected the vehicle.
492	CAMRY	2004	1/21/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, his vehicle lurched forward while in park, hitting a nearby vehicle. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
493	COROLLA	2005	1/24/2005	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle accelerated at maximum speed for about 5-6 seconds when he hit the brake while trying to park.
494	RX 330	2004	1/24/2005	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date(s) customer had acceleration and braking issues with his vehicle.
495	CAMRY	2003	1/28/2005	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date the accelerator got stuck causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
496	TUNDRA	2001	1/31/2005	Customer called regarding her 2001 Toyota Tundra SR5. Customer's husband was driving the vehicle. Specifically, customer claims that on an unknown date the vehicle drove through front glass doors of a store while husband was backing out of a parking space. Customer further claims that vehicle was in park and husband had his foot on the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
497	PRIUS	2004	1/31/2005	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle lurched and shuddered while driving. Customer further claims that twice the vehicle went up to 80 mph without the customer's intervention. Customer further claims that the radio controls stopped working and that the screen froze. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
498	CAMRY	2005	1/31/2005	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates, on some occasions, while his foot is on the brake, the tachometer goes up and the vehicle accelerates. Customer further claims that he has intermittent dangerous safety problems.
499	CAMRY SOLARA SE	2002	2/2/2005	Customer called regarding her husband's 2002 Toyota Camry Solara SE. Customer claims that on June 24, 2004 the vehicle surged forward and rear-ended another vehicle while she was exiting a parking lot. Customer further claims that she braked but the vehicle kept accelerating. Customer claims that a second incident of sudden acceleration occurred on September 16, 2004. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
500	CAMRY	2005	2/4/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, when customer applies the brakes, the vehicle seems to surge. Customer further claims on one occasion, he had to stop in a snow bank to avoid a collision with another vehicle.
501	LX 470	2001	2/10/2005	Customer's attorney wrote letter on customer's behalf regarding customer's 2001 Lexus LX 470. Customer claims that on an unknown date customer lost control of his vehicle and vehicle crossed a median and hit a tanker truck. Customer further claims that a defect in the vehicle caused him to lose control. An FTS inspected the vehicle.
502	LS 430	2002	2/11/2005	Customer called regarding his 2002 Lexus LS 430. Specifically, customer claims that on two separate unknown dates the accelerator of his vehicle stuck. Customer further claims that on one of these dates, customer pushed the accelerator slightly while going around a curve, the accelerator stuck and vehicle hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
503	CAMRY	2005	2/14/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, his vehicle goes forward at stop signs.
504	CAMRY	2004	2/15/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle attempted to move forward on its own in once instance. Customer states that he turned the vehicle off when this happened.
505	CAMRY	2002	2/17/2005	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on unknown dates, her vehicle sped up to 45 mph without pressing on the accelerator. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
506	SIENNA	2004	2/18/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates his vehicle surged while applying the gas pedal.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
507	HIGHLANDER	2005	2/18/2005	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on an unknown date, her father was driving the vehicle and stopped at a traffic light when the throttle suddenly went down and the vehicle surged forward.
508	ES 330	2004	2/23/2005	Customer called regarding her 2004 Lexus ES 330. Customer claims that on February 23, 2005, her vehicle accelerated by itself.
509	HIGHLANDER	2004	2/23/2005	Customer emailed regarding his 2004 Toyota Highlander. Specifically, customer claims that when he presses the accelerator pedal, there is a delay in vehicle response that causes a significant upshift and jerk in the car's transmission. Customer also alleges that when he downshifts the vehicle, there is high revving.
510	SIENNA	2004	2/23/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates when entering the highway his vehicle paused and then surged.
511	Scion tC	2005	2/25/2005	Customer claims that when the vehicle is driven, the check engine light comes on, the engine has rough idle, and the vehicle surges. The vehicle was checked and the customer's concerns were verified. When the A/F sensor was unplugged during a test drive, the vehicle acted normally. A known good A/F sensor was swapped in to verify the repair. The technician was advised to replace the A/F sensor.
512	CAMRY	2004	3/2/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date his wife backed into the driveway and the vehicle surged backwards and pushed into another vehicle. An FTS inspected the vehicle.
513	CAMRY	2004	3/3/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged forward.
514	HIGHLANDER	2005	3/3/2005	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on an unknown date she was driving on the freeway and the vehicle kept speeding up. Customer further claims that she attempted to decelerate and put her foot on the brake, but the vehicle did not stop. She then put on the emergency brake and shifted into park and rear ended another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
515	CAMRY	2004	3/3/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date his wife was pulling into a parking structure when the vehicle suddenly surged forward.
516	PRIUS	2002	3/3/2005	Customer called regarding his 2002 Toyota Prius. Specifically, customer claims that on an unknown date the accelerator stuck and his vehicle hit another vehicle.
517	CAMRY	2005	3/3/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle lunged forward while at a stop, then started making a moaning sound and lunged again. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
518	CAMRY	2004	3/4/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle tried to move forward by itself, so he turned the vehicle off.
519	CAMRY	2005	3/7/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date her husband was driving up the driveway when the vehicle surged forward and went up a rocky hill. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
520	CAMRY	2005	3/7/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date she set the cruise control at 70 mph and the vehicle then accelerated to 80 mph. Customer further claims that on January 3, 2005, she tried to stop at a light but the vehicle would not stop when she applied the foot brake and parking brake, and she had to turn off the ignition. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
521	PRIUS	2004	3/7/2005	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle had an electrical motor surge while driving. A Field Technical Specialist inspected the vehicle.
522	CAMRY	2002	3/8/2005	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date(s) when he approached a stop, he let off the accelerator but the vehicle ran ahead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
523	SIENNA	2004	3/8/2005	Customer called regarding his 2004 Toyota Sienna XLE. Specifically, customer claims that on an unknown date, his vehicle uncontrollably accelerated and surged forward as he was 7 feet from the garage causing him to crash into the divider. Customer further claims that at the time of the accident he had his foot on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
524	CAMRY	2003	3/9/2005	Customer called regarding her 2003 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date vehicle surged forward and rearended another vehicle while customer had her foot on the brake. Customer further claims that after the initial impact, the vehicle surged forward a second time and rearended the same vehicle in front of her. Customer claims sudden acceleration occurred while the vehicle was already in motion.
525	CAMRY	2004	3/14/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was waiting for someone to back out of a parking space and took her foot off the brake, after which the vehicle surged forward.
526	CAMRY	2003	3/14/2005	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date(s) the vehicle accelerated while customer stepped on brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
527	LS 430	2005	3/15/2005	Consumer claims that there was a delay when shifting from reverse to drive, then there was jerking. The transmission pressure was checked. The transmission assembly and torque converter were replaced.
528	RX 330	2005	3/15/2005	Customer called regarding her 2005 Lexus RX 330 (V6). Specifically, customer claims that on an unknown date(s) the gas pedal got stuck. Customer further claims that the gas pedal is stiff and jerks when she pushes on it.
529	CAMRY	2004	3/15/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on November 19, 2004, the vehicle accelerated on its own while customer was parking the vehicle. Customer claims that he experienced the same problem on January 23, 2005. Customer further claims that cruise control "randomly engages" from time to time. A Field Technical Specialist (FTS) inspected the vehicle.
530	COROLLA	2005	3/16/2005	Customer wrote a letter regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle cruised too fast with her foot off of the accelerator.
531	Camry	2005	3/18/2005	Customer claims that the vehicle engine surges under light throttle cruise. The engine data list was viewed on the scan tool while the condition was present. When the A/F sensor value was locked by the active test the condition was eliminated. Replacement part was ordered and part from a good vehicle was to be swapped in to confirm the repair.
532	SC 300	2000	3/18/2005	Customer called regarding his 2000 Lexus SC 300. Specifically, customer claims that on an unknown date when vehicle came to a stop it surged forward and hit a curb. Customer further claims that his wife's foot was on the brake when vehicle surged. Customer claims that on a second unknown date the vehicle surged while in the driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
533	PRIUS	2005	3/23/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle sometimes surged forward when in park and the gas engine turned on. Customer further claims that the vehicle was not getting the gas mileage stated on the window sticker. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
534	PRIUS	2005	3/24/2005	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into an embankment. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
535	COROLLA	2005	3/24/2005	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle accelerated at maximum speed for about 5-6 seconds when he hit the brake while trying to park. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
536	TACOMA	2005	3/28/2005	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date the vehicle took over and went from 30 mph to 90 mph while his wife was driving. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
537	PRIUS	2005	3/28/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on an unknown date the vehicle was inching forward when warming up even though the vehicle was in park.
538	TACOMA	2005	3/29/2005	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on March 29, 2005 the vehicle surged and the RPM increased when braking with the brake pedal all the way to the floor. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
539	TACOMA	2005	3/30/2005	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle idles high. It is unknown if FTS inspected the vehicle. It is unknown if the claimed condition occurs while the vehicle is already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
540	TACOMA	2005	3/30/2005	Customer called regarding his 2005 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle would not stop when his wife pressed the brakes and she had to put the vehicle in neutral and pull to the side of the road to stop the vehicle. Customer further claims that the vehicle accelerated from 30 mph to 90 mph. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
541	CAMRY	2005	3/31/2005	Customer called regarding his 2005 Toyota Camry. Customer claims that while pulling into a parking space, with his foot on the brake, the vehicle surged forward. Customer claims that his vehicle ended up in the middle of a major street.
542	TACOMA	2005	4/4/2005	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on April 4, 2005 the vehicle surged and the RPM increased when braking with the brake pedal all the way to the floor. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
543	CAMRY	2002	4/5/2005	Customer called regarding her 2002 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date vehicle surged forward while she was exiting a carwash causing her to hit signs and trees. Customer further claims that when vehicle surged forward she had her foot on the brake and had put the vehicle in drive. Customer claims that the sudden acceleration occurred while vehicle was at a full stop.
544	CAMRY	2004	4/8/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that as he pulling out a parking spot, the vehicle lunged forward when he put his foot on the accelerator pedal. Customer alleges that his wife experienced a similar incident while driving the vehicle on a separate occasion.
545	CAMRY	2003	4/11/2005	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on three unknown dates the customer's vehicle surged forward. Customer further claims that on the last occasion the vehicle surged forward while she was pulling into driveway and hit garage door. Customer claims that her foot was on the brake at time of accident. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
546	TUNDRA	2004	4/11/2005	Customer called regarding his 2004 Toyota Tundra. Specifically, customer claims that on unknown dates the vehicle idled too high. Customer further claims that on unknown dates the vehicle continued to move at 15 mph after a full stop. Customer claims that that the sudden acceleration occurred while the vehicle was at a full stop.
547	CAMRY	2004	4/11/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates the gas pedal was sticking.
548	TUNDRA	2005	4/12/2005	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that on unknown dates the vehicle surged forward while stopping.
549	PRIUS	2004	4/14/2005	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
550	CAMRY	2002	4/14/2005	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date her husband was driving the vehicle and pulling into a parking space and the vehicle accelerated forward and hit a staircase. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
551	TUNDRA	2005	4/15/2005	Customer called regarding her 2005 Toyota Tundra. Specifically, customer claims that on an unknown date, her vehicle experienced unintended acceleration, causing her to unexpectedly change lanes, resulting in tire, wheel, and truck bed damage. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
552	TUNDRA	2005	4/18/2005	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that on unknown dates when he took his foot off the brake at a stop there was a creep and the vehicle moved forward.
553	SIENNA	2004	4/19/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on an unknown date, her vehicle experienced unintended acceleration as it backed out of the driveway, causing her to collide with neighbor's wall. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
554	CAMRY SOLARA	2005	4/21/2005	Customer called regarding his 2005 Toyota Camry Solara. Specifically, customer claims that on unknown dates, the throttle surges when he brakes. A FTS inspected the vehicle.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
555	RX 330	2004	4/21/2005	Customer called regarding her 2004 Lexus RX 330 (V6). Specifically, customer claims that on an unknown date her vehicle surged forward, went over a concrete barrier and hit a building. Customer further claims that on a second unknown date her vehicle surged forward as she was pulling into her garage. Customer claims that she had to slam brakes to get vehicle to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
556	RX 330	2004	4/25/2005	Customer called regarding 2004 Lexus RX 330 (V6). Specifically, customer claims that on April 23, 2005, his wife was driving the vehicle and pulled into a parking space and was unable to put the car in park. Customer further claims that the car lunged forward and began to drive up a dirt hill at approximately 45 degrees. Customer claims that vehicle high centered towards the top of the hill and shut itself off. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
557	CAMRY	2003	4/26/2005	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her vehicle lurched forward while she was going 5 mph. Customer further claims that such an incident happened on one other occasion when she was going less than 10 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
558	Tacoma	2005	4/27/2005	Customer claims that the vehicle bucks while being driven and at the same time emits a high-pitch whining noise. Customer complaint was confirmed and the noise isolated to the manual transmission assembly. Fluid level in vehicle was checked and confirmed to be very low. Rear transmission extension housing seal was checked and confirmed to be leaking fluid into extension housing. Transmission assembly was replaced in order to repair the vehicle.
559	LS 430	2002	4/29/2005	Dealer initially called on behalf of customer and customer made several follow up calls regarding her 2002 Lexus LS 430. Specifically, customer claims that on April 28, 2005 her vehicle accelerated when she was pulling into a parking spot. Customer further claims that her vehicle went over the parking stall and hit some shopping carts. Customer claims that vehicle had previously lunged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
560	COROLLA	2005	5/4/2005	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on May 4, 2005, her vehicle surged twice. Customer further claims that one surge caused her to hit a curb.
561	CAMRY	2004	5/4/2005	Customer called regarding his 2004 Toyota Camry XLE. Customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that this occurred on two separate incidents. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred after the vehicle had been brought to a stop.
562	TUNDRA	2005	5/6/2005	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that on unknown dates the vehicle surged forward while stopping.
563	CAMRY	2005	5/10/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while his mother-in-law was making a u-turn, the engine surged, causing her to collide with another vehicle. A FTS inspected the vehicle.
564	CAMRY	2003	5/11/2005	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on three unknown dates the customer experienced problems with the gas pedal that resulted in the vehicle going forward but would not stop. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
565	TACOMA	2005	5/11/2005	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle revs. It is unknown if FTS inspected the vehicle. It is unknown if the claimed condition occurs while the vehicle is already in motion.
566	CAMRY	2004	5/11/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was at a stop light with her foot on the brake when the engine began to roar and the vehicle lurched forward. Customer further claims that she hit the vehicle in front of her, and her vehicle continued to leap forward until she took out the key. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
567	CAMRY	2003	5/13/2005	Customer wrote letter to Congresswoman regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date in January 2004 her vehicle surged forward and hit a concrete wall while she was parking her vehicle. Customer further claims that her vehicle surged on three separate occasions. Customer claims that sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
568	ES 300	2002	5/16/2005	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on May 12, 2005, his wife was driving the vehicle and was at a stop light, stepped on the accelerator and the gas pedal got stuck. Customer further claims that vehicle took off and hit a light pole at 5 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
569	GX 470	2004	5/16/2005	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on an unknown date(s), her vehicle pushed forward while at a stop light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
570	PRIUS	2005	5/20/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on an unknown date when his wife was driving the vehicle, it went into park and began lurching back and forth. Customer further claims that after restarting the vehicle, it would only travel one car length then turn off, and cycled on and off.
571	CAMRY	2005	5/26/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle seemed to jerk at low RPM and ran rough cold and on morning starts.
572	CAMRY	2004	5/26/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date his wife was approaching a stop sign when the vehicle began to accelerate. Customer further claims that his wife then hit the brakes and put the vehicle in park and turn the ignition off, and the vehicle proceeded to lunge forward and rear end another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was already in motion and while at a full stop.
573	LAND CRUISER	1999	5/27/2005	Customer called regarding his 1999 Toyota Land Cruiser. Specifically, customer claims that in May 2005 his wife pulled into a parking spot and took her foot off the gas pedal, at which point the vehicle went into high idle, then moved forward and hit another vehicle even though she was pressing the brake all the way to the floor. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
574	CAMRY	2004	5/31/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates the speedometer would jump 10-12 mph even if the cruise control was set. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
575	CAMRY	2004	5/31/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was attempting to get into her driveway when the accelerator stuck and the vehicle would not stop, causing her to hit a barn. Customer further claims that on another unknown date, the vehicle surged again.
576	HIGHLANDER	2004	5/31/2005	Customer's father in law called regarding customer's 2004 Toyota Highlander. Specifically, customer claims that on an unknown date, his vehicle suddenly surged forward and the rpms were very high as he stopped outside of the garage door, causing him to crash into a cement wall. Customer further claims that at the time of the accident he had his foot on the brake pedal.
577	SIENNA	2004	6/1/2005	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on an unknown date her accelerator pedal stuck and the brake failed while driving on the highway.
578	SIENNA	2004	6/1/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates the vehicle lurched forward when it accelerated.
579	TUNDRA	2005	6/3/2005	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that on unknown dates the vehicle lunged forward while at a complete stop. Customer further claims that the RPMs went up to 3200 while driving at 30 mph. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
580	4RUNNER	2004	6/3/2005	Customer emailed regarding her 2004 4Runner. Specifically, customer claims that on an unknown date she was coming to a stop when the car lurched forward 15 feet before it finally stopped. Customer further claims that on an unknown date she was going downhill and braked for a light when there was a loud groaning screech and the car lurched forward two car lengths before the brakes engaged allowing the vehicle to come to a complete stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
581	PRIUS	2004	6/3/2005	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
582	HIGHLANDER	2005	6/6/2005	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on unknown dates he experienced hesitation and acceleration problems.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
583	CAMRY	2003	6/7/2005	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date two years ago, he was stopped at a red light with his foot on the brake when his vehicle began to go forward, causing him to rear-end another vehicle. Customer further claims that he thought he may have been stepping on brake pedal and gas pedal simultaneously. Customer further claims that the incident occurred several more times, including to his wife. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
584	TUNDRA	2003	6/7/2005	Customer called regarding his 2003 Toyota Tundra SR5. Specifically, customer claims that on unknown dates, when he removed his foot off the gas pedal, the vehicle kept going and did not slow down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
585	AVALON	2005	6/15/2005	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that he purchased a new Avalon and does not feel like shifting of the vehicle feels safe. Customer claims that the vehicle will not respond.
586	HIGHLANDER	2005	6/16/2005	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on an unknown date he hit the brakes but the vehicle was still accelerating. Customer further claims that the vehicle slowed down, but the engine was still running high. Customer further claims that when he started the vehicle back up, the throttle was maxed out.
587	SIENNA	2004	6/16/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on an unknown date, his cousin was driving the vehicle and had just finished backing out of the driveway when the vehicle suddenly accelerated forward into the house.
588	SCION TC	2005	6/16/2005	Customer called regarding his 2005 Scion tC. Customer claims that on an unknown date, he was driving and pressed the brakes but the car would not stop, and the engine continued racing. Customer claims that on a separate incident in the same week, customer was stopped at a light but the engine continued to run at high speed and took longer to stop than it should have. Customer claims that the incidents occurred both while in motion and at a full stop.
589	PRIUS	2005	6/20/2005	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates when sitting at a stop she felt a hard jerk and the vehicle seemed to shift hard. Customer further claims that on June 20, 2005, she was driving the vehicle and the warning light went on faintly then went out.
590	TUNDRA	2002	6/20/2005	Customer called regarding 2002 Toyota Tundra SF. Customer claims that when vehicle comes to a complete stop, the vehicle will surge forward. Customer claims that sudden acceleration occurs while vehicle is already in motion.
591	SCION TC	2005	6/21/2005	Customer called regarding her 2005 Scion TC. Specifically, customer claims that on an unknown date her vehicle surged backward at an extremely fast pace, causing her to crash into two parked vehicles. Customer alleges that the incident occurred as she was pulling out of a parking spot, she had put the vehicle in reverse and released the parking brake. Customer further alleges that she did not step on the brake or accelerator pedal prior to the vehicle suddenly accelerating.
592	HIGHLANDER	2005	6/24/2005	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on an unknown date she experienced brake failure and the vehicle began accelerating on its own. Customer further claims that she could only stop the vehicle by putting it in park.
593	SCION TC	2005	6/27/2005	Customer called regarding her 2005 Scion TC. Specifically, customer claims that on an unknown date(s) the vehicle started to accelerate on its own.
594	HIGHLANDER	2005	6/29/2005	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on June 24, 2005, he experienced brake failure and the vehicle began accelerating on its own.
595	CAMRY	2005	6/29/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, she was driving about 5 mph and pressing the brakes to slow when the vehicle accelerated and hit the back of a truck, then stalled. Customer further claims that on August 25, 2005, the vehicle accelerated and hit items in the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
596	AVALON	2005	7/5/2005	Customer called regarding his 2005 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, his engine revs high when idling before responding to engage into a gear. Customer claims that the sudden acceleration occurred while the vehicle was stopped.
597	CAMRY	2003	7/5/2005	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates his vehicle lurched forward.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
598	AVALON	2005	7/6/2005	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward when down shifting. Customer further claims that the vehicle's engine sagged and the RPM increased to 2000 or 3000 when slowing down from a speed over 30 mph and then accelerating lightly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
599	CAMRY	2005	7/7/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, his vehicle idles very fast. Customer further claims that his engine goes too fast and has to put his foot on brake constantly.
600	PRIUS	2004	7/7/2005	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on an unknown date, he was driving on the highway and had to slow down due to traffic, and when he took his foot off of the accelerator, the vehicle accelerated. Customer further claims that this is the second occurrence of such acceleration; the first instance occurred approx. one month earlier.
601	CAMRY	2005	7/7/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that while pulling his vehicle into a garage, his vehicle surged forward and hit a wall. Customer further claims that the antenna light for xm satellite was also flashing prior to incident.
602	SIENNA	2004	7/7/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on unknown dates his vehicle accelerated on its own.
603	CAMRY	2005	7/8/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, while driving his vehicle, he stepped on his brake and the engine accelerated.
604	Camry	2004	7/9/2005	Customer claims that the vehicle surges intermittently and at intermittent speeds. FTS inspected the vehicle and confirmed the condition during a test drive with the customer. The condition occurred under load while accelerating and was most noticeable at speeds up at approximately 35 mph. All inspected wiring and components were found operating as designed. The B1S1 Air Fuel Ratio Sensor was replaced.
605	PRIUS	2004	7/11/2005	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
606	PRIUS	2005	7/14/2005	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle shot forward when hitting a bump or pothole in the road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
607	TUNDRA	2004	7/15/2005	Customer called regarding his 2004 Toyota Tundra. Specifically, the customer claims, on unknown dates, that the vehicle idles too high at first start up. Customer further claims that the vehicle would mellow down approx 3 minutes later. Customer further claims that, when HVAC is operating, the vehicle surges forward as rpms's increase.
608	CAMRY	2002	7/18/2005	Customer called regarding his 2002 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date(s) his vehicle experienced a power surge around 22 mph. Customer further claims that his vehicle traveled 25 mph or more without his foot on the gas. Customer further claims that vehicle experienced a power surge at around 40 mph and abnormal shifting at 20-40 mph.
609	HIGHLANDER	2004	7/19/2005	Customer emailed regarding his 2004 Toyota Highlander. Specifically, customer claims that on unknown dates when letting off the accelerator then reapplying the accelerator, the vehicle hesitated then lurched. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
610	RAV 4	2004	7/26/2005	Customer called regarding her 2004 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle hesitated then lunged forward.
611	CAMRY	2002	7/26/2005	Customer called regarding his 2002 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date his wife was driving the vehicle and was in line to enter a parking structure and the vehicle accelerated. Customer further claims that his wife hit three other vehicles and could only stop the car by applying the brake and turning off the ignition. Customer claims that a similar incident had happened after purchasing the vehicle. An FTS inspected the vehicle.
612	SIENNA	2004	7/26/2005	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on unknown dates she had concerns regarding the acceleration of the vehicle.
613	SIENNA	2004	7/26/2005	Customer's husband called regarding customer's 2004 Toyota Sienna. Specifically, customer claims that on unknown dates the vehicle sped up by itself and when she took her foot off the gas, the vehicle kept going.
614	TUNDRA	2003	7/28/2005	Customer called regarding his 2003 Toyota Tundra SR5 (V8). Specifically, customer claims that on unknown date(s) his vehicle jerked as it started to accelerate. Customer further claims that vehicle jumped forward on acceleration. Customer claims that sudden acceleration occurred while the vehicle is already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
615	TACOMA	2005	7/28/2005	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle RPM "races" and idles high. It is unknown if FTS inspected the vehicle. It is unknown if the claimed condition occurs while the vehicle is already in motion.
616	CAMRY	2002	7/28/2005	Customer called regarding his 2002 Toyota Camry LE. Customer claims that on an unknown series of dates the accelerator jerked forward. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
617	AVALON	2005	7/29/2005	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, his engine races.
618	COROLLA	2005	8/1/2005	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal was more sensitive than she was used to and that when backing up, the vehicle moved quickly.
619	ES 330	2005	8/4/2005	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on August 2, 2005, his wife was backing up in a parking lot and when she placed the vehicle into drive it "shot out like a rocket uncontrollable." Customer further claims that the vehicle sped over two curbs, down a hill, over a concrete water basin, up a hill, across a two lane street, over another curb, and into a bush, where the vehicle came to halt. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
620	SEQUOIA	2002	8/4/2005	Customer called regarding her 2002 Toyota Sequoia Limited. Specifically, customer claims that on unknown dates as her vehicle was coming to a stop the vehicle tried to jump or lurch. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
621	CAMRY	2003	8/4/2005	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date when customer put vehicle in reverse her vehicle accelerated. Customer further claims that she thinks she had her foot on the brake when the vehicle accelerated. Customer claims she then put the vehicle in forward and the vehicle accelerated into a pole.
622	SIENNA	2004	8/5/2005	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that his vehicle jerks and surges forward aggressively when pressing the gas pedal.
623	CAMRY	2004	8/8/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates her mother had problems with the vehicle. Customer further claims that her mother was pulling into a parking space and felt that the vehicle spontaneously accelerated and that the gas pedal pulled away from her foot.
624	CAMRY	2004	8/10/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates when she took her foot off the brake pedal after stopping, the vehicle accelerated by itself without touching the gas pedal. Customer further claims that unless she stepped hard on the brakes, the vehicle took off at a high speed. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
625	GX 470	2004	8/15/2005	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on unknown dates her vehicle jerked before coming to a stop. Customer further claims that vehicle unexpectedly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
626	ES 330	2005	8/16/2005	Customer called regarding his wife's 2005 Lexus ES 330. Specifically, customer claims that on unknown date(s) the vehicle lurged forward while sitting in traffic. Customer further claims that vehicle has hesitated.
627	CAMRY	2005	8/17/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, she was parking the vehicle when it jumped forward, went through several fences and stopped in the middle of a road. Customer further claims that her foot was on the brake. An FTS inspected the vehicle.
628	LAND CRUISER	2002	8/17/2005	Customer called regarding his 2002 Toyota Land Cruiser. Specifically, customer claims that on unknown dates the accelerator stuck and the vehicle was out of control.
629	CAMRY	2005	8/17/2005	Customer wrote regarding his 2005 Toyota Camry. Specifically, customer claims that he was driving and applied the brakes when the vehicle lurched forward, causing him to hit another vehicle.
630	CAMRY	2002	8/18/2005	Customer called regarding his 2002 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date his vehicle took off while he was reversing out of a driveway. Customer further claims that vehicle jumped a curve and hit a house across the street. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
631	LAND CRUISER	2002	8/18/2005	Customer called regarding his 2002 Toyota Land Cruiser. Specifically, customer claims that on unknown dates the accelerator stuck and the vehicle was out of control.

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IR13_Complaints_and_Field_Repor

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
632	COROLLA	2005	8/22/2005	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date while driving she noticed that the RPMs were going up and that the gas pedal got stuck. Customer further claims that the brakes did not respond and she lost control of the vehicle and hit an embankment.
633	AVALON	2005	8/22/2005	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged without him pressing on the gas pedal. Customer further claims that the vehicle seemed to lunge backwards when he put it in reverse after starting up the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
634	ES 330	2005	8/23/2005	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on unknown date(s) her vehicle jumped when she accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
635	CAMRY	2005	8/23/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle was involved in an accident.
636	SCION TC	2005	8/23/2005	Customer called regarding his 2005 Scion TC. Specifically, customer claims that on an unknown date his vehicle took off while parking in a driveway. Customer further claims that his vehicle surged, would not stop and hit a tree. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
637	ES 330	2005	8/26/2005	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on an unknown date(s) his vehicle lunged while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
638	CAMRY	2005	8/29/2005	Customer called regarding his 2005 Toyota Camry. Customer claims that while parking his vehicle, it surged forward and hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
639	CAMRY	2004	8/30/2005	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims in December 2004 when his wife was driving the vehicle, she was trying to get into a parking space when the vehicle suddenly surged forward. Customer claims that his wife's foot was on the brake during this time. Customer states that the vehicle then went up a hill, back down the hill, and hit another vehicle. Customer further claims that on August 26, 2005, he was driving the vehicle and the vehicle surged forward from 10 to 50 miles per hour. Customer claims that the vehicle would not stop despite application of the brakes. Customer claims that a collision resulted from the incident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
640	AVALON	2005	8/30/2005	Customer emailed regarding her 2005 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, his vehicle's engine revs very high and loud. Customer further claims that the vehicle does not accelerate and the problem repeats when the vehicle reaches 20-30 mph. Customer claims that the sudden acceleration occurred while the vehicle is stopped and while it is in motion.
641	SCION TC	2005	8/31/2005	Customer called regarding his 2005 Scion TC. Specifically, customer claims that on an unknown date his vehicle took off while parking in a driveway. Customer further claims that his vehicle surged, would not stop and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
642	GX 470	2005	8/31/2005	Customer called regarding her 2005 Lexus GX 470. Specifically, customer claims that on unknown date(s) her vehicle accelerated to 15 mph without her putting her foot on gas while the vehicle was in drive and in reverse.
643	LS 430	2001	9/2/2005	Customer called regarding her 2001 Lexus LS 430 4-Dr Sedan. Specifically, customer claims that on an unknown date her vehicle surged while she was pulling into a parking lot. Customer further claims that she put her foot on the brake but the vehicle continued to surge and she hit a pole. Customer claims that the sudden acceleration occurred while the vehicle as already in motion and also when the vehicle was at a full stop after it hit the pole.
644	MATRIX	2005	9/6/2005	Customer called regarding his 2005 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, the vehicle revved high twice while in park and surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
645	GX 470	2003	9/7/2005	Customer called regarding his 2003 Lexus GX 470 4 WD SUV. Specifically, customer claims that on unknown date(s) his vehicle lunged forward and drove rough.
646	RAV 4	2004	9/8/2005	Customer called regarding her 2004 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated forward, jumped the curb, causing her to hit a parking sign. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
647	CAMRY	2005	9/12/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while pulling into a parking space, the vehicle accelerated forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
648	CAMRY	2005	9/12/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, the customer's vehicle accelerated forward.
649	ES 330	2005	9/14/2005	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on an unknown date her vehicle accelerated and hit a parked car. An FTS inspected the vehicle.
650	RX 330	2004	9/14/2005	Customer called regarding her 2004 Lexus RX 330 (V6). Specifically, customer claims that on an unknown date her vehicle surged, hit and building and continued for 50 more feet before stopping.
651	CAMRY	2005	9/16/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown date, the vehicle was jerking. Customer further claims that the vehicle was accelerating forward while driving. Customer claims that the vehicle rolled and was totaled. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
652	AVALON	2005	9/20/2005	Customer called regarding his 2005 Toyota Avalon Touring. Specifically, customer claims that September 13, 2005, he experienced sudden acceleration in his vehicle when he stepped on the brake pedal. Customer further claims that this sudden acceleration after depressing the brake pedal occurred one additional time.
653	CAMRY	2003	9/21/2005	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date, her vehicle accelerated while she was applying the brake while moving out of a parking spot. Customer further claims that the vehicle's engine revved at red line and returned to red line after shutting off and restarting the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while already in motion.
654	SEQUOIA	2005	9/22/2005	Customer called regarding her 2005 Toyota Sequoia. Specifically, customer claims that the vehicle accelerates whenever she takes her foot off the gas pedal.
655	CAMRY	2003	9/22/2005	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on two unknown dates, his vehicle accelerated when he put the vehicle into reverse. Customer further claims that he almost lost control of the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
656	LS 400	2000	9/26/2005	Customer called regarding his 2000 Lexus LS 400. Specifically, customer claims that on an unknown date, his vehicle accelerated with force while he was attempting to slow down to avoid a vehicle that had cut in front of him, causing him to lose control of the vehicle on the slippery parkway, hit a road divider, rotate the vehicle 360 degrees, and crash. Customer further claims that his vehicle's steering wheel locked at the time of the sudden acceleration. Customer further claims that his vehicle had previously sporadically accelerated when removing his foot from the brake and accelerated on its own while on highways. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
657	PRIUS	2004	9/26/2005	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
658	RAV 4	2004	9/26/2005	Customer called regarding his 2004 Toyota RAV4. Specifically, customer claims that on an unknown date his wife was driving, and the vehicle surged forward, causing her to hit a tree. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
659	CAMRY	2002	9/27/2005	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date, his vehicle surged while driving.
660	AVALON	2005	9/28/2005	Customer called regarding his 2005 Toyota Avalon Touring. Specifically, customer claims that on unknown dates, his vehicle is accelerating when the brake pedal is pressed.
661	CAMRY	2003	9/28/2005	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date, her vehicle accelerated upon starting her vehicle in her driveway, causing her to crash into a wall. Customer further claims that her vehicle had previously lurched forward. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
662	TUNDRA	2005	9/28/2005	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that on an unknown date he was driving around a curve when another vehicle came into his lane and forced him off the road. Customer further claims that when he got back on the road, the throttle stuck and the vehicle spun and hit a pole.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
663	4RUNNER	2005	9/29/2005	Customer's wife called regarding customer's 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates when she was at a stop light, the vehicle jumped into acceleration.
664	COROLLA	2005	9/30/2005	Customer's wife called regarding his 2005 Toyota Corolla LE. Customer claims that on an unknown date while making a U-Turn on a narrow street, the vehicle accelerated forward quickly. The customer further claims this caused the vehicle to go over the curve and suffer damages. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
665	PRERUNNER	2003	9/30/2005	Customer called regarding his 2003 Toyota Prerunner. Specifically, customer claims that on unknown dates, his vehicle lunged while coming to a stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
666	ES 300	2003	10/3/2005	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on many unknown dates, his engine surged.
667	ES 300	2002	10/4/2005	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated, causing an accident. An FTS inspected the vehicle.
668	COROLLA	2005	10/4/2005	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that she was pulling out of a parking spot and put the vehicle in drive when it suddenly surged and hit another vehicle. An FTS inspected the vehicle.
669	CAMRY	2005	10/5/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date she was pulling into her garage when the vehicle accelerated and ran into the wall. Customer further claims that her foot was on the brake and the vehicle would not stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
670	CAMRY	2005	10/5/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date when stopping at a stop light and then pressing on the gas pedal, the vehicle hesitated and then surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
671	AVALON	2005	10/5/2005	Customer called regarding his 2005 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, his vehicle was involved in an accident while pulling into the gates of a parking lot. Customer claims that his foot was on the brake and the vehicle accelerated forward and hit a gate and a mailbox. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
672	CAMRY	2005	10/10/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates the engine revved high and the vehicle accelerated on its own.
673	AVALON	2006	10/11/2005	Customer called and emailed regarding his 2006 Toyota Avalon XL. Specifically, customer claims that on unknown dates, he experienced a shifting problem allegedly related to power train. Customer further claims that his car hesitates excessively in certain conditions, after firm pressure is applied on the accelerator pedal and trying to accelerate quickly.
674	4RUNNER	2004	10/12/2005	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on an unknown date the customer was stopped at a light and when she went to drive off, the vehicle surged several times. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
675	GX 470	2004	10/12/2005	Customer called regarding his 2004 Lexus GX 470. Specifically, customer claims that on an unknown date, his engine revved, and he had to brake, apply the emergency brake, and turn off the vehicle to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
676	GX 470	2005	10/12/2005	Customer called regarding her 2005 Lexus GX 470. Specifically, customer claims that on October 12, 2005, her vehicle suddenly accelerated while parking her vehicle. Customer further claims she had to slam on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
677	CAMRY	2005	10/13/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jumped forward when driving at low speeds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
678	PRIUS	2002	10/14/2005	Customer called regarding his 2002 Toyota Prius 4-door. Specifically, customer claims that on an unknown date, his vehicle surged after starting the vehicle and putting into drive. Customer further claims that the brakes did not respond and he had to turn off the vehicle to stop it. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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IR13_Complaints_and_Field_Repor

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
679	AVALON	2005	10/17/2005	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle shifted erratically in lower gears, then slowed and surged. Customer further claims that the laser guided cruise control caused the vehicle to quickly accelerate with a great surge of power when the vehicle in front of her changes lanes.
680	AVALON	2006	10/18/2005	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged when he took his foot off of the gas pedal while driving at 40 mph, which caused him to have to hit the brakes sooner than he felt he should. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
681	AVALON	2006	10/19/2005	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle hesitated at 500 RPM then surged hard while he was driving at low speeds in low gears. Customer further claims that this has happened at least 6 times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
682	ES 330	2005	10/19/2005	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on several unknown dates, her vehicle lurched when accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
683	PRIUS	2005	10/19/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on an unknown date his wife was parking and took her foot off the brake when the vehicle jumped the curb and hit a tree. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
684	TACOMA	2005	10/24/2005	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on October 20, 2009 the vehicle surged on two occasions. Customer further claims that on the first occasion, he was backing into a parking space and the vehicle surged backwards. Customer further claims that on the second occasion the vehicle dropped from 40 mph to 5mph, then surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
685	PRIUS	2002	10/24/2005	Customer called regarding his 2002 Toyota Prius 4-door. Specifically, customer claims that on an unknown date, his vehicle surged after starting the vehicle without pressing the accelerator. Customer further claims that he had to turn off the vehicle to stop it. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
686	AVALON	2005	10/25/2005	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle hesitated then surged upon acceleration. Customer further claims that the vehicle's RPM fluctuate while driving.
687	SIENNA	2005	10/25/2005	Customer called regarding her 2005 Toyota Sienna CE. Specifically, customer claims that on unknown dates, his vehicle would surge forward or hesitate after a complete stop. An FTS inspected the vehicle.
688	TACOMA	2005	10/25/2005	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on October 20, 2009 the vehicle surged on two occasions. Customer further claims that on the first occasion, he was backing into a parking space and the vehicle surged backwards. Customer further claims that on the second occasion the vehicle dropped from 40 mph to 5mph, then surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
689	SIENNA	2005	10/27/2005	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that on an unknown date his wife was putting the vehicle in park after pulling into a parking spot when the vehicle suddenly moved on its own and would not respond to the brakes, causing the vehicle to hit a bush and then a wall. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
690	CAMRY SOLARA SLE	2004	11/2/2005	Customer called regarding wife's 2004 Toyota Camry Solara SLE. Specifically, customer claims that on two unknown dates, the vehicle surged while travelling at low speeds. Customer further claims that the gas pedal felt like it was stuck and the engine revved. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
691	TACOMA	2005	11/4/2005	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle RPM revs and idles high. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs while the vehicle is completely stopped during a cold start and while already in motion.
692	ES 330	2005	11/7/2005	Customer described the condition as a jerk feeling when accelerating from a stop. Checked the ID numbers, they were up to date. No repair was made.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
693	CAMRY	2002	11/7/2005	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle surged while depressing the brake in a parking stall, causing her to hit another vehicle. Customer further claims that the same occurrence happened again months later while approaching a parking stall at a low speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
694	PRIUS	2005	11/7/2005	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
695	SIENNA	2005	11/11/2005	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on an unknown date, customer's vehicle experienced unintended acceleration upon start up. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
696	CAMRY	2005	11/11/2005	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle revved high after placing the vehicle in drive or reverse. Customer further claims that on an unknown date the vehicle jolted forward after stopping at a service station. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
697	CAMRY	2005	11/15/2005	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on October 14, 2005, she was stopped in traffic with her foot on the brake and when she lifted her foot slowly, the vehicle accelerated and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
698	HIGHLANDER	2005	11/15/2005	Customer's husband called regarding customer's 2005 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle surged from a stop. Customer further claims that the accelerator pedal stuck from start up and the vehicle raced to over 2000 RPM and stayed there until customer kicked the accelerator pedal. Customer further claims that after trying to stop the vehicle, the engine still raced over 1800 RPM. Customer claims that the sudden acceleration occurred while the vehicle was both at a full stop and already in motion.
699	HIGHLANDER	2004	11/15/2005	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on an unknown date his wife was waiting in a line of cars and when she took her foot off the brake pedal and touched the accelerator pedal, it went to the floor and the vehicle lurched forward and hit the vehicle in front of her. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
700	CAMRY	2006	11/15/2005	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when he took his foot off the accelerator, the vehicle continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
701	CAMRY	2003	11/17/2005	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle accelerated on its own, almost causing an accident. Customer further claims that the unintended acceleration occurred intermittently.
702	CAMRY	2003	11/18/2005	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on November 15, 2005, her vehicle took off while she was driving 25 MPH, causing her to hit three other vehicles. Customer further claims that she received a ticket for driving an unsafe vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
703	AVALON	2005	11/18/2005	Customer called regarding his 2005 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, the steering wheel thumps when he turns left. Customer further claims that while slowing down and accelerating the transmission does not operate properly. Dealer inspected and repaired the vehicle.
704	SIENNA	2005	11/18/2005	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that on October 23, 2005, his wife was pulling out of a parking lot at 5 mph when the vehicle jumped forward and hit two parked vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
705	GS 300	2006	11/21/2005	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date, her vehicle continued to acceleration even as she pressed the brake down. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.

#95828

IR13_Complaints_and_Field_Report

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
706	HIGHLANDER	2006	11/23/2005	Customer called regarding her 2006 Toyota Highlander Ltd. Specifically, customer claims that on November 22, 2005, her vehicle accelerated on its own and the brakes, while working, caught on fire. Customer further claims that the accelerator had stuck once before. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
707	IS 300	2003	11/28/2005	Customer called regarding his 2003 Lexus IS 300. Specifically, customer claims that on an unknown date in November 2005, his vehicle accelerated on its own and the gas pedal got stuck. Customer further claims that the accelerator had stuck twice before. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
708	HIGHLANDER	2004	11/29/2005	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on July 8, 2005, the vehicle accelerated at a high speed in reverse. Customer further claims that on November 22, 2005, the vehicle accelerated, causing him to go through three fences and a corner of his garage.
709	CAMRY	2002	11/29/2005	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
710	LS 430	2004	11/29/2005	Customer called regarding her 2004 Lexus LS 430. Specifically, customer claims that on November 20, 2005, her husband was driving the vehicle at 5 mph at a country club when the vehicle suddenly accelerated, hit a fence, went airborne, and landed in the lower level of the lot by the swimming pool where it will need to be removed by a crane. Customer further claims that in June 2005, the vehicle suddenly accelerated while her husband was braking hitting a truck. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
711	4RUNNER	2005	11/30/2005	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on November 28, 2005, the vehicle was running and in park with the parking brake on so customer could get her child out of the car seat when the vehicle lunged forward and hit another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
712	AVALON	2005	11/30/2005	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on October 23, 2005 the vehicle was out of control and almost lurched into oncoming traffic. Customer further claims that on June 19 and June 20, 2005 the vehicle almost lurched over a mountain. Customer further claims that brakes did not stop the vehicle, and that he had to shift out of drive and turn off the ignition. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
713	AVALON	2005	12/1/2005	Customer called regarding his 2005 Toyota Avalon. Customer claims that on June 19 and 20, 2005, the vehicle accelerated, and the brakes would not stop the vehicle. Customer further claims that on October 23, 2005, the acceleration was out of control and the vehicle lurched into traffic. Customer states that the sudden acceleration occurred while the vehicle was already in motion.
714	PRIUS	2004	12/5/2005	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle's engine raced on hills. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
715	AVALON	2005	12/6/2005	Customer called regarding his 2005 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, his vehicle pulls to the left, the engine races, and the customer feels that he must slam on the brakes in order to slow down the vehicle. Customer further claims the engine revs. Dealer could not duplicate the condition.
716	CAMRY	2005	12/6/2005	Customer's brother-in-law called regarding customer's 2005 Toyota Camry. Specifically, customer claims that on December 4, 2005, she was pulling out of a parking lot and applied the brakes to make a turn when the vehicle would not stop. Customer further claims that her vehicle went into oncoming traffic and was hit by another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
717	CAMRY	2002	12/7/2005	Customer's husband called regarding his wife's 2002 Toyota Camry LE. Specifically, customer's husband claims that on December 7, 2005, the vehicle was completely stopped with his foot on the brake when the engine revved, causing him to hit a parked vehicle, drive onto the sidewalk where he hit hedges and a decorative lamp post, and return back to the street where he hit and broke a large brown pole before coming to a stop. Customer further claims that he saw smoke coming from the hood of the vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
718	4RUNNER	2005	12/7/2005	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on November 1, 2005, she tried to accelerate when the throttle stuck, and she had to pump the brakes and put the vehicle in neutral in order to stop it.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
719	SIENNA	2005	12/8/2005	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that on an unknown date his wife was pulling into the garage when the vehicle surged and hit the garage wall. An FTS inspected the vehicle.
720	TACOMA	2005	12/13/2005	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle revs and accelerates quickly when cold. FTS did not inspect the vehicle. The customer further claims the condition occurs while the vehicle is completely stopped during a cold start and while already in motion.
721	CAMRY	2002	12/14/2005	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates, his vehicle accelerated and the RPM rose to 160. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
722	TACOMA	2006	12/16/2005	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle revs and the engine will race when cold and when shifting gears. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs while the vehicle is completely stopped during a cold start and while already in motion.
723	CAMRY SOLARA SE	2004	12/19/2005	Customer called regarding her 2004 Toyota Camry Solara SE. Specifically, customer claims that on an unknown date, her vehicle took off on its own and accelerated to 80 MPH. Customer further claims that she had to use the parking brake to make the vehicle stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
724	PRIUS	2005	12/19/2005	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on December 19, 2005, when the vehicle came to a stop he felt the engine stop and go and felt a surge every time the vehicle started. Customer further claims that the engine ran very fast and he had no control over the engine.
725	TACOMA	2006	12/19/2005	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle revs and the engine will race when cold and when shifting gears. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs while the vehicle is completely stopped during a cold start and while already in motion.
726	4RUNNER	2005	12/20/2005	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on December 19, 2005, her husband was stopping at a light when the vehicle accelerated to 65-70 mph and rear ended a school bus. Customer further claims that on unknown dates the vehicle lunged forward when braking. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
727	SIENNA	2005	12/20/2005	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on December 19, 2005, the vehicle accelerated unintentionally. Specifically, customer claims that she pressed the brake pedal to slow the vehicle but that did not work, then placed the vehicle in neutral before using the parking brake to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
728	SIENNA	2005	12/22/2005	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on December 19, 2005 the vehicle began to accelerate on its own. Customer further claims that she pressed the brake pedal and put the vehicle into neutral but the vehicle failed to stop. Customer alleges that the vehicle finally came to a stop after she engaged the parking brake.
729	IS 300	2001	12/23/2005	Customer called regarding her 2001 Lexus IS 300. Specifically, customer claims that on an unknown date, her vehicle had acceleration problems.
730	CAMRY	2004	12/23/2005	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, she stopped the vehicle but it kept rolling, and her leg was pinned by the door and the concrete.
731	GS 300	2003	12/27/2005	Customer called regarding her 2003 Lexus GS 300. Specifically, customer claims that on three unknown dates, his vehicle surged while stopped, causing the vehicle to enter an intersection. Customer further claims that the vehicle intermittently accelerated and the RPMs reached 1800 or 2000. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
732	IS350	2006	12/27/2005	Customer called regarding her 2006 Lexus IS 350. Specifically, customer claims that on an unknown date, while making right turn from a stop, the vehicle revved and was spinning out of control as if on ice.
733	CAMRY SOLARA SE	2004	12/27/2005	Customer called regarding her 2004 Toyota Camry Solara SE. Specifically, customer claims that on November 25, 2005, her vehicle accelerated in a parking lot, causing her to go through a fence and hit a sign and boulders by the curb. Customer further claims that the vehicle also accelerated through stoplights after the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
734	4RUNNER	2005	12/30/2005	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on January 10, 2009, she was stopped at a light with her foot on the brake. Customer further claims that her foot was on the brake but that the engine raced and made a loud noise. Customer states that the vehicle then jerked forward, hitting three (3) vehicles in front of her. Customer claims that she had both feet on the brakes and was able to turn the vehicle off at this point. A Field Technical Specialist (FTS) inspected the vehicle.
735	GS 300	2003	1/3/2006	Customer called regarding his 2003 Lexus GS 300. Specifically, customer claims that on an unknown date, the gas pedal locked and the vehicle accelerated, causing an accident when he came to a yield sign. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
736	CAMRY	2003	1/3/2006	Customer called regarding his 2003 Toyota Camry LE. Customer claims that on an unknown date, the throttle stuck and caused him to rear-end another vehicle.
737	AVALON	2006	1/4/2006	Customer called regarding his 2006 Toyota Avalon Limited. Customer claims that that on unknown dates, his vehicle takes off too fast. Customer canceled his appointment for inspection.
738	TACOMA	2005	1/4/2006	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged twice during acceleration and red lined to 6500 RPM at 20 mph. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
739	TUNDRA	2003	1/4/2006	Customer called regarding his 2003 Toyota Tundra SR5. Specifically, customer claims that on January 3, 2006, customer's son was driving the vehicle at 40 mph when it surged forward, causing the vehicle to spin out on the slippery road, hit a center divider, crash into a tree, and get hit by another vehicle. Customer further claims that the vehicle had accelerated on its own in the past. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
740	TACOMA	2004	1/4/2006	Customer called regarding his 2004 Toyota Tacoma. Specifically, the customer claims, on unknown dates, there is a clunking sound when trying to stop the vehicle. Customer further claims that when the vehicle does stop, the vehicle lunges forward. Customer further claims that when taking foot off of the brake the vehicle lunges forward. FTS inspected the vehicle.
741	CAMRY	2006	1/5/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on January 5, 2006, he was pulling into a parking spot at 3 mph and had taken his foot off the gas pedal when the vehicle unintentionally accelerated, causing him to hit a fence. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
742	TACOMA	2005	1/6/2006	Customer called in regarding a 2005 Toyota Tacoma. The particulars of this case are not listed. It is unknown if FTS inspected the vehicle.
743	LS 430	2001	1/6/2006	Customer called regarding his 2001 Lexus LS 430. Specifically, customer claims that on an unknown date in January 2006, his vehicle jolted forward when he put the vehicle into park, causing the vehicle to hit a light post in a parking lot. Customer further claims that the vehicle had previously darted backwards while in reverse with his foot on the brake and darted forward about five feet when putting the vehicle into park. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
744	ES 330	2005	1/9/2006	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on unknown dates, her vehicle experienced acceleration problems.
745	HIGHLANDER	2004	1/9/2006	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that she has been experiencing acceleration concerns with her vehicle.
746	PRIUS	2006	1/9/2006	Customer called regarding his 2006 Toyota Prius Hybrid. Specifically, customer claims that on December 31, 2005, his vehicle suddenly accelerated when he was driving about 30 mph up a hill and the engine raced. Customer further claims that he used the brakes and placed the car in neutral and then turned the vehicle off. Customer claims that he turned his vehicle back on and a minute later the unintended acceleration continued and the car surged forward even though he did not press the accelerator pedal. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
747	AVALON	2005	1/9/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lurched forward when the brake pedal was released to accelerate from a stop. Customer further claims that the vehicle idled at 750 RPM. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
748	RX 330	2005	1/10/2006	Customer called regarding his 2005 Lexus RX 330. Specifically, customer claims that on January 8, 2006, his vehicle accelerated as his foot was on the brake and the engine was revving even after putting the vehicle in neutral. Customer further claims that he was unable to stop the vehicle until turning the cruise control off. Customer further claims that several days earlier customer's son was driving the vehicle when the gas pedal stuck and customer's son had to put his foot under the gas pedal to get it to work. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
749	TACOMA	2005	1/10/2006	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle idles high. It is unknown if FTS inspected the vehicle. The customer further claims the high idle occurs when the vehicle is at a complete stop and continues after the vehicle is in motion.
750	CAMRY	2005	1/11/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while her father was driving her vehicle, the vey suddenly started to accelerate. Customer claims that her father has experienced these occurrences on more than one occasion. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
751	SIENNA	2005	1/13/2006	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that on an unknown date the accelerator stuck to the floor while he was attempting to merge onto the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
752	AVALON	2005	1/13/2006	Customer called regarding his 2005 Toyota Avalon Limited. Specifically, customer claims that on unknown dates his vehicle shifts from zero to 20 mph and it does not feel smooth. Customer further claims that when using the cruise control, his vehicle takes off and jumps. Customer took the vehicle to the dealer.
753	RX 330	2005	1/17/2006	Customer claims that the vehicle jerked when accelerating. The vehicle was test-driven and it was found that the transmission hunted for the proper gear at low speeds when on and off the accelerator. No repair.
754	Rav4	2005	1/18/2006	Customer claims that the car surges during acceleration. The vehicle was test driven and the problem was verified. The A/F sensor was disconnected and the surge disappeared. The A/F sensor was replaced to remedy the condition.
755	CAMRY	2006	1/19/2006	Attorney wrote on behalf of customer. Customer complained regarding 2006 Toyota Camry LE. Customer claims that on an unknown date, vehicle lunged forward while braking, causing an accident. Customer claims that sudden acceleration occurred while vehicle was already in motion.
756	CAMRY	2006	1/20/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on January 9, 2006, she pulled the vehicle into a parking stall and put it in park, when the vehicle surged ahead and hit another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
757	CAMRY SOLARA	2005	1/24/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that the engine is running too fast and that he has to press brakes hard in order to stop vehicle.
758	CAMRY	2005	1/24/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date he went to back up and the vehicle revved up and hit the house. Customer further claims that when he put the vehicle in drive it shot forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
759	4RUNNER	2004	1/25/2006	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on September 3, 2005, she was parallel parking and applied the brake, but the vehicle accelerated, jumped backward and hit a dumpster. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
760	COROLLA	2006	1/25/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle had unintended acceleration while customer's foot was on the brake.
761	AVALON	2006	1/30/2006	Customer called regarding his 2006 Toyota Avalon XL. Specifically, customer claims that on unknown dates, when sitting idle, his idle speed does not seem to correct itself. Customer further claims on one occasion, his brakes did not engage and he was in an accident. Customer did not take vehicle to dealer.
762	PRIUS	2002	2/3/2006	Customer called regarding his wife's 2002 Toyota Prius. Specifically, on February 3, 2006 while his wife was driving the vehicle jumped forward resulting in a collision with another vehicle. Customer further claims that on an unknown date two years earlier, the vehicle had accelerated in an opposite direction when they tried to stop. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
763	IS 300	2004	2/4/2006	Customer called regarding his 2004 Lexus IS 300. Specifically, customer claims that on an unknown date, customer's wife was driving the vehicle at 1-2 MPH into the garage when the vehicle sped forward, hitting the HVAC, water heater, gas line, and a load-bearing wall. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
764	RX 400h	2006	2/4/2006	Customer called regarding her 2006 Lexus RX 400h. Specifically, customer claims that on an unknown date, she was driving her vehicle at 38-42 mph when the vehicle pulsed and jerked. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
765	MATRIX	2005	2/6/2006	Customer called regarding his Toyota Corolla Matrix. Customer claims that on February 3, 2006, his wife was backing up the driveway when the vehicle accelerated and crashed into the house. An FTS inspected the vehicle. Customer claims that sudden acceleration occurred while vehicle was already in motion.
766	AVALON	2005	2/6/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while stopped at stoplight, the vehicle started accelerating. Customer claims that he touched the brake, and the engine went to 7K RPM. Customer claims that he put the transmission in neutral, turned the vehicle off, and started it again, and the vehicle went back to 7K RPM. Customer claims that a similar incident happened six times.
767	GX 470	2004	2/6/2006	Customer called regarding his 2004 Lexus GX 470. Specifically, customer claims that on unknown dates, his vehicle jumped forward when slowing down or stopping as though he had been hit from the back. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
768	COROLLA	2006	2/6/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date he was stopped at a light when the vehicle accelerated forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
769	CAMRY	2005	2/8/2006	Customer called regarding her 2005 Toyota Camry XLE. Customer claims that on January 27, 2005, she was pulling into a parking lot when the vehicle accelerated forward and hit a fire hydrant. Customer claims that sudden acceleration occurred while vehicle was already in motion.
770	TUNDRA	2005	2/8/2006	Customer called regarding his 2005 Toyota Tundra. Specifically, the customer claims, on unknown dates, while aggressively stepping on gas to accelerate, vehicle throttle sticks full open and she has to turn off the ignition to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
771	CAMRY	2003	2/8/2006	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on January 21, 2006, his vehicle experienced sudden unintended acceleration, causing it to hit a parked vehicle at a gas station. An FTS inspected the vehicle.
772	RX 330	2004	2/9/2006	Customer called regarding her 2004 Lexus RX 330. Specifically, customer claims that on February 8, 2006, she was reversing her vehicle to parallel park when the vehicle lurched backwards, causing the vehicle to go down the curb about thirty feet. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
773	AVALON	2005	2/10/2006	Customer called regarding his 2005 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, the vehicle accelerates on its own.
774	TACOMA	2005	2/14/2006	Customer called regarding his 2005 Toyota Tacoma V6. Specifically, customer claims that on an unknown date that when he was at a stop sign and began to accelerate his vehicle suddenly accelerated, causing him to end up in the middle of an intersection. Customer further claims that when he begins to accelerate from a full stop his vehicle surges. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
775	TUNDRA	2006	2/15/2006	Customer called regarding his 2006 Toyota Tundra. Specifically, the customer claims, on February 2007, the customer claims he was traveling at 50mph applied the brakes and was only able to get down to about 35 mph. Customer further claims the engine began to race as he downshifted. Customer claims that he applied more brake pressure and the pedal gave way. Customer further claims that the brakes came back up, so he pumped brakes then the pedal went down to the floor and brakes stopped responding causing an accident which totaled the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
776	TACOMA	2006	2/21/2006	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that when vehicle is put into drive, the vehicle does not move. A Field Technical Specialist (FTS) inspected the vehicle. The problem appears to have been fixed.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
777	CAMRY	2005	2/22/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while driving her vehicle, it suddenly accelerated and she crashed into a building. Customer further claims that the occurrence happened again after driving the exact same route and pulling into the exact same parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
778	CAMRY	2004	2/24/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates periodically when her vehicle was going over the speed of 20 miles per hour, the vehicle jerked forward. Customer further claims that periodically the RPMs idled very high. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
779	TACOMA	2004	2/24/2006	Customer called regarding his 2004 Toyota Tacoma. Specifically, the customer claims, on April 11, 2004, while traveling, the engine failed with only 1,111 miles on the odometer.
780	AVALON	2005	2/24/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's engine intermittently accelerated to about 7000 RPM.
781	SEQUOIA	2004	2/27/2006	Customer called regarding her 2004 Toyota Sequoia. Specifically, customer claims that on December 21, 2005, she was turning into a lube shop when the engine revved up and the vehicle crashed through a glass door of the shop.
782	COROLLA	2006	2/27/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle jerked and the brakes did not stop it when driving between 50 and 70 mph on the freeway.
783	CAMRY	2003	2/27/2006	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on November 12, 2005 his car experience unintended acceleration leading to an accident as the vehicle approached a stop sign. Customer claims the sudden acceleration occurred while the vehicle was at a stop
784	COROLLA	2006	2/27/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on January 24, 2006, the vehicle's accelerator got stuck and the vehicle accelerated into a tree when she started to pull forward after having backed it up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
785	ES 330	2004	2/27/2006	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date her vehicle lunged forward when she shifted from neutral, leading to an accident. Customer further claims the brakes failed to stop the acceleration. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
786	CAMRY	2006	2/28/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on December 13, 2005, customer shifted the vehicle into drive and the vehicle lurched forward. Customer further claims that on February 23, 24, and 28, 2006, the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
787	CAMRY	2002	2/28/2006	Service manager called on behalf of customer regarding her 2002 Toyota Camry LE. Specifically, customer claims that on unknown occasions, her vehicle experienced problems. No mention of whether unintended acceleration occurred. A FTS inspected the vehicle.
788	CAMRY	2004	3/1/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date while she was driving the vehicle, the vehicle accelerated and jumped forward without warning. Customer further claims that this caused an accident in which her vehicle hit a parked car. Customer claims that her vehicle sustained extensive damage on its front left side. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
789	CAMRY	2005	3/2/2006	Attorney general wrote on behalf of customer. Customer complained regarding her 2005 Toyota Camry XLE. Customer claims that on January 27, 2005, she was pulling into a parking lot when the vehicle accelerated forward and hit a fire hydrant. An FTS inspected the vehicle. Customer claims that sudden acceleration occurred while vehicle was already in motion.
790	4RUNNER SR5	2001	3/2/2006	Customer's husband called regarding customer's 2001 Toyota 4Runner SR5. Specifically, customer's husband claims that on February 27, 2006, customer was driving on the freeway when the vehicle surged to the left and stalled out in the fast lane, causing another vehicle to hit her. Customer's husband claims that the sudden acceleration occurred while the vehicle was already in motion.
791	PRIUS	2006	3/2/2006	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle had a jerking issue. Customer further claims that the vehicle was not getting the gas mileage it should be getting.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
792	AVALON	2006	3/8/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's gas pedal had a slight surge feel when accelerating. Customer further claims that the vehicle overrevved at low speeds, especially when turning.
793	TACOMA	2005	3/9/2006	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
794	TACOMA	2006	3/10/2006	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine made a noise that got louder at higher speeds, and that the vehicle's front end shook at 70 mph.
795	PRIUS	2004	3/13/2006	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
796	CAMRY	2004	3/13/2006	Customer's son called regarding customer's 2004 Toyota Camry. Specifically, customer claims that on unknown dates the accelerator locked up. Customer further claims that on an unknown date he almost had an accident when the gas pedal went to the floor.
797	MATRIX	2005	3/13/2006	Customer called regarding his 2005 Toyota Corolla Matrix. Customer claims that on Feb 13 and 22, 2006, the vehicle took off and surged when put into gear. Customer further claims that vehicle surges while parking. Customer claims that sudden acceleration occurs both while in motion and while at a full stop.
798	CAMRY	2002	3/15/2006	Customer called regarding her 2002 Toyota Camry SE. Specifically, customer claims that on February 15, 2006, she was backing out of a gas station parking space when the vehicle suddenly accelerated, spinning the vehicle around and causing it to hit two walls and another vehicle. Customer further claims that she was unable to stop the vehicle and received a traffic ticket for reckless driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
799	COROLLA	2006	3/15/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date, the vehicle accelerated and decelerated quickly while going up or down a hill with cruise control turned on.
800	CAMRY	2003	3/18/2006	Customer's son called regarding customer's 2003 Toyota Camry LE. Specifically, customer's son claims that on March 16, 2006, customer was backing out of her driveway when the vehicle suddenly accelerated across the street, up the curb, and into neighbors driveway where she hit a mail box, telephone service, and the neighbor's car. Customer's son claims that the sudden acceleration occurred while the vehicle was already in motion.
801	CAMRY	2002	3/20/2006	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on March 14, 2006, customer's wife was backing out of their driveway when the engine revved and the vehicle accelerated backwards and hit a tree. Customer further claims that the rear wheels of the vehicle were still spinning even after the vehicle hit the tree and was stopped. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
802	TACOMA	2006	3/21/2006	Customer called regarding his 2006 Toyota Tacoma. Customer claims that vehicle will periodically accelerate on its own. Customer claims that sudden acceleration occurs both while already in motion and while at a full stop.
803	ES 330	2005	3/22/2006	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on February 25, 2006, her vehicle lurched forward at a fast speed when she shifted from park to drive, which caused the vehicle to shoot forward and hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
804	ES 330	2004	3/22/2006	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, she was pulling into a parking space and when she removed her foot from the brake the vehicle surged forward, hitting a van parked eight to ten feet in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
805	CAMRY	2006	3/22/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle would surge forward at every stop or corner.
806	4RUNNER	2006	3/22/2006	Corporate customer called regarding their 2006 Toyota 4 Runner SR5. Customer claims that on unknown dates on three separate occasions, the vehicle accelerated on its own up to 100 MPH. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
807	RAV 4	2004	3/22/2006	Customer called regarding her 2004 Toyota RAV4. Specifically, customer claims that on an unknown date she was pulling into a parking lot when the vehicle accelerated.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
808	RAV 4	2006	3/25/2006	Customer emailed regarding his 2006 Toyota RAV4. Specifically, customer claims that on unknown dates when he started the engine cold the RPMs went up to 1500, and when he put the vehicle in drive, it jumped forward unless he stepped on the brake very firmly. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
809	CAMRY	2004	3/29/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date she was driving up her driveway when the vehicle surged and kept going, causing her to hit her husband's vehicle and part of the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
810	AVALON	2006	3/29/2006	Customer called regarding her 2006 Avalon Limited. Specifically, customer claims that on unknown dates, his vehicle revs high and switches gears while driving from slow speed to high speed. Customer claims dealer could not find anything wrong with the vehicle.
811	SEQUOIA	2004	3/30/2006	Customer wrote regarding her 2004 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle surged forward when the brake was applied, and that she was in an accident due to surging. An FTS inspected the vehicle.
812	COROLLA	2005	3/31/2006	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on an unknown date his daughter was pulling into a parking garage at a slow speed with her foot on the brake when the vehicle jumped forward and hit the concrete base of a pole. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
813	AVALON	2006	4/3/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on March 25, 2006 the vehicle's engine surged when he applied the brakes, and the brakes made a noise. Customer further claims that the same thing happened on unknown prior dates. An FTS inspected the vehicle.
814	TACOMA	2005	4/3/2006	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle's engine raced.
815	CAMRY	2006	4/4/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on April 4, 2006, his mother-in-law was driving when the accelerator stuck and the vehicle would not slow down, causing her to hit a street sign and a telephone pole. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
816	LX 470	2006	4/4/2006	Customer called regarding her 2006 Lexus LX 470. Specifically, customer claims that on an unknown date, she was driving down her driveway when her vehicle surged, hitting her other vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
817	CAMRY	2003	4/4/2006	Customer called regarding his 2003 Toyota Camry XLE. Specifically, customer claims that on an unknown date, he was reversing his vehicle when it suddenly accelerated, hitting another vehicle. Customer further claims that he was given a traffic ticket for reckless driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
818	Tacoma	2005	4/6/2006	Customer claims that after a cold start the vehicle intermittently has a hunting/surging fast idle. Vehicle tested and customer's concern verified; conclusion that the condition is more prevalent in cooler ambient temperatures and is hard to duplicate. The engine ECM was replaced but this did not repair vehicle. No repair.
819	RX 400h	2006	4/6/2006	Customer called regarding his 2006 Lexus RX 400h. Specifically, customer claims that on an unknown date, his vehicle accelerated by itself just after he shifted into drive while parking, causing the vehicle to slam into another vehicle and a building. A FTS inspected the vehicle.
820	COROLLA	2006	4/11/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on April 11, 2006, she was pulling into a parking space when the vehicle accelerated and would not stop even though she was pressing on the brakes. Customer further claims that the vehicle jumped the curb and hit a parking sign with a concrete base. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
821	SIENNA	2004	4/11/2006	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on March 7, 2006, she was pulling into a parking space at about 10 mph, applied the brakes when the vehicle surged, causing her to hit a tree. Customer further claims that on October 6, 2005, she had an accident when the vehicle surged and she hit a parking guard. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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822	CAMRY	2003	4/11/2006	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on three (3) unknown dates, his vehicle surged while pulling into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
823	RAV 4	2004	4/12/2006	Customer called regarding his 2004 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle surged forward violently when the clutch was released.
824	SEQUOIA	2003	4/13/2006	Customer called regarding her 2003 Toyota Sequoia SR5. Specifically, customer claims that on unknown dates, her vehicle has lunged forward while sitting still. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
825	MATRIX	2005	4/17/2006	Customer called regarding 2005 Toyota Corolla Matrix. Customer claims that on April 17, 2006, the vehicle was stopped at a light when it surged forward, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
826	CAMRY	2006	4/17/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on April 13, 2006, she was driving 30 mph when she hear a noise and tried to stop, but the vehicle did not stop when the brakes were depressed, and the vehicle started speeding up. Customer further claims that she ran into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
827	Camry	2007	4/18/2006	Customer claims that the vehicle lunges forward when coming to a stop. The vehicle was test driven in fifth, fourth, and third gears, and the problem duplicated in each gear. The SLT solenoid was replaced, but no change to the vehicle was observed. Transaxle was ordered.
828	CAMRY	2004	4/20/2006	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on January 7, 2006, he had an accident when the vehicle accelerated while pulling into a parking spot. Customer further claims that on an unknown date he had another accident due to sudden acceleration.
829	GX 470	2005	4/21/2006	Customer called regarding her 2005 Lexus GX 470. Specifically, customer claims that on unknown dates, her vehicle has surged both during deceleration and at full stops.
830	GX 470	2004	4/25/2006	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on unknown dates, her vehicle's RPM's go up while stopped at a stoplight when the A/C is on. Also, the vehicle accelerates backwards in neutral and she has to hold down the brake quite hard.
831	4RUNNER	2005	4/25/2006	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates he had to keep his foot on the brakes when he drove, otherwise the vehicle would take off too fast.
832	GS 430	2006	4/26/2006	Driver claims that during the slalom portion of New Model training, the throttle stuck open and he had to apply heavy brake pressure to slow the vehicle. The pedal assembly and the mounting point were inspected and the pedal assembly was removed from the lower mounting bracket. Pedal was replaced with a service part.
833	TUNDRA	2006	4/26/2006	Customer called regarding her 2006 Toyota Tundra. Specifically, customer claims that on April 24, 2006, she left the vehicle running with the a/c on and when she came back and stepped on the running board with one foot, the vehicle went backward out of control, running over her hips and legs. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
834	LS 400	1998	4/27/2006	Customer called regarding his 1998 Lexus LS 400. Specifically, customer claims that on unknown dates, his vehicle idled too high.
835	GX 470	2004	5/1/2006	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on unknown dates, the vehicle lurched forward while she was stopping for a light. Customer further claims that she felt like she was being hit from behind by another vehicle when this occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
836	ES 300	2003	5/3/2006	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates, the vehicle accelerated and stalled on its own.
837	COROLLA	2006	5/3/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal was not working correctly.
838	CAMRY	2007	5/4/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] when his vehicle accelerates at a slow speed it hesitates. Customer further claims that the vehicle jumps and that the ride is rough.
839	SIENNA	2004	5/5/2006	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on January 10, 2009, his wife was parking the vehicle with her foot on the brake when it accelerated and hit the vehicle in front of her.

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1	Model	Model Year	Report or claim date	Summary
840	SIENNA	2004	5/5/2006	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on January 11, 2009 he was at a complete stop with his foot on the brakes when the engine continued to race and the vehicle surged forward, causing him to rear end another vehicle. A Field Technical Specialist (FTS) inspected the vehicle.
841	HIGHLANDER	2006	5/5/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on unknown dates, the vehicle jerked, pulsated, and surged when he accelerated between 30-40mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
842	CAMRY	2007	5/8/2006	Customer's husband called regarding their 2007 Camry LE. Specifically, customer alleges on an unknown date the vehicle was slow to accelerate and the rpms would surge to 35500 rpms and then drop down once the gears engage.
843	CAMRY	2005	5/9/2006	Customer called regarding her 2005 Toyota Camry XLE. Customer claims that on April 12, 2006 the vehicle took off and accelerated on its own while the customer attempted to pull into a parking space. Customer further claims that the vehicle then struck a tree. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
844	TACOMA	2005	5/9/2006	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle revved and surged during acceleration and at 2000 RPM the vehicle's engine shut on and off and surged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
845	AVALON	2006	5/10/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's engine intermittently surged on its own up to 3000 RPM when he slowed down while making a turn. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
846	CAMRY	2004	5/12/2006	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on two unknown dates, his vehicle experienced unintended acceleration causing two accidents, including once when his wife was driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
847	CAMRY	2005	5/12/2006	Customer called regarding her 2005 Toyota Camry. Customer claims that she experienced a surge.
848	CAMRY	2004	5/12/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on October 22, 2006, while pulling into a parking lot, her vehicle lunged forward. Customer claims that, she stepped on the brake and the vehicle jumped over a curb. On another occasion, on November 18, 2006, customer claims her vehicle lunged forward with her foot on the brake. And on May 8, 2006, customer claims her vehicle experienced a similar incident.
849	COROLLA	2005	5/12/2006	Insurance agent called regarding customer's 2005 Toyota Corolla. Specifically, customer claims that on April 24, 2006, the vehicle accelerated up a curb and into two parked vehicles while he was attempting to pull into a parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
850	LS 430	2006	5/15/2006	Customer claims that after driving the vehicle 20 miles the engine surged and stalled at stops. Vehicle was inspected and raw fuel was found in vacuum line from intake manifold to charcoal canister. Fuel tank, charcoal canister and filter for canister were replaced.
851	TACOMA	2006	5/18/2006	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears and idles high. FTS inspected the vehicle and recommended that the throttle position sensor be replaced even though the sensor was operating within factory specs. The customer further claims the condition occurs when the vehicle is already in motion.
852	AVALON	2006	5/23/2006	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's engine surged up to 4700 RPM when the cruise control was turned on. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
853	RAV 4	2006	5/24/2006	Customer's wife called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle surged while in reverse mode. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
854	CAMRY	2007	5/24/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle hesitates when he travels at 40 miles per hour. Customer further claims that this condition has almost caused an accident.
855	CAMRY	2006	5/25/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged unexpectedly. A Field Technical Specialist (FTS) inspected the vehicle.

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1	Model	Model Year	Report or claim date	Summary
856	CAMRY	2005	5/30/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on May 22, 2006, her husband was slowly pulling into a parking spot when the vehicle lunged forward, jumping the parking block and hitting a concrete wall. Customer further claims that on March 30, 2006 there was an incident of engine racing. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
857	ES 330	2006	6/1/2006	Customer claims that vehicle was bucking at 20 mph. The vehicle was test-driven and a shudder was felt intermittently at 20 mph during light acceleration. A similar vehicle was test-driven and a similar shifting concern was felt. The vehicle was checked for diagnostic trouble codes, and none were found. No repair.
858	ES350	2007	6/1/2006	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle jumped and all of the lights on the dashboard came on.
859	RX 330	2006	6/2/2006	Customer called regarding her 2006 Lexus RX 330. Specifically, customer claims that on an unknown date, the vehicle surged/accelerated forward as she tried to park, causing her to hit the car in front of her. Customer further claims that this unexpected acceleration has happened twice. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
860	CAMRY	2006	6/3/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he was parking the vehicle when the vehicle started racing and the RPMs went up, and he had to brake very fast.
861	CAMRY	2002	6/5/2006	Daughter called on behalf of her mother, regarding her mother's 2002 Toyota Camry XLE. Specifically, caller claims that on May 20, 2006, the vehicle unintentionally accelerated as her mother reversed out of the driveway, causing her to crash into a boulder in the neighbor's yard, flip over, and receive several injuries. Caller further claims that the vehicle reversed at approximately 70mph. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
862	CAMRY	2006	6/6/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates when taking her foot off the gas, the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
863	AVALON	2005	6/6/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle hesitated and lunged forward while accelerating.
864	CAMRY	2004	6/6/2006	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle lurched forward while the customer had his foot on the brake.
865	CAMRY	2007	6/6/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the cruise control on the vehicle downshifts and upshifts "all the time." Customer further claims that this occurs when he is driving on slight inclines. Customer states that vehicle also hesitates, jerks, and then takes off when he is making a right turn. Customer claims that sudden acceleration occurs while the vehicle is in motion.
866	AVALON	2005	6/8/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle seemed like someone was shoving it from the rear when it was stopped at a light.
867	AVALON	2006	6/9/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's engine intermittently surged on its own up to 3000 RPM when he slowed down while making a turn. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
868	GS 300	2006	6/12/2006	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on unknown dates, the vehicle jumped when he started it, causing him to almost hit something. Customer further claims that the vehicle's rpm jumped to 2,000 and it jumped forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
869	CAMRY	2002	6/13/2006	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates, the vehicle jumped when he started it, causing him to almost hit something. Customer further claims that while he was in a parking lot, the vehicle surged forward quickly, but he was able to stop it by pressing the brake. Customer further claims that the vehicle surged forward on a separate occasion when he was pulling into his garage, causing him to hit a chair and put a hole in the garage wall.
870	SIENNA	2006	6/13/2006	Customer called regarding her 2006 Toyota Sienna. Specifically, customer claims that on unknown dates when using the dynamic cruise control, the vehicle accelerated rapidly and revved up to 4500 RPMs after the vehicle decelerated to 5 mph.

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1	Model	Model Year	Report or claim date	Summary
871	AVALON	2006	6/13/2006	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lurched forward when she let up on the brake. Customer further claims that the passenger seat rattled and that the vehicle's remote was not working properly.
872	4RUNNER	2004	6/13/2006	Customer wrote regarding his 2004 Toyota 4Runner. Specifically, customer claims that on May 16, 2006, his wife was stopped at a light with her foot on the brake when the vehicle accelerated. Customer further claims that on May 13, 2006, he tried to apply the brake while turning into a parking lot and the vehicle accelerated. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while already in motion.
873	TUNDRA	2004	6/15/2006	Customer called regarding his 2004 Toyota Tundra Limited. Specifically, customer claims that on unknown dates, his vehicle feels like someone is pushing his bumper when he eases up on the brake after a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
874	CAMRY	2006	6/15/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked forward at the touch of the accelerator. Customer further claims that the vehicle lurched forward while at a stop with the brakes on. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
875	AVALON	2005	6/16/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lunged forward at low speeds, when shifting, when starting off, and when coming to a stop.
876	CAMRY	2006	6/19/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date she was parking in her garage, and before she turned the vehicle off the vehicle jumped out of gear and made a hole in the garage. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
877	CAMRY	2004	6/19/2006	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, while driving in rush hour traffic, the vehicle slowed on its own, it started to heat up, and he heard a loud noise from the engine. The vehicle then accelerated on its own up to 90 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
878	CAMRY	2006	6/21/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle sped up while in reverse and hit two parked cars. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
879	PRIUS	2006	6/21/2006	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle started up on its own and raced forward while in park. Customer further claims that on unknown dates the vehicle raced out of control for about two minutes while she was driving. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
880	4RUNNER	2004	6/21/2006	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on an unknown date her vehicle accelerated while she was pulling into her garage. Customer further claims that she had to slam on her brakes to make the vehicle stop. Customer claims that the gas pedal was not caught on the floor mat. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
881	CAMRY SOLARA SE	2004	6/22/2006	Customer called regarding his 2004 Toyota Camry Solara SE. Specifically, customer claims that on June 16, 2006, the vehicle accelerated unexpectedly in reverse when his wife tried to back out of the garage, causing her to hit his truck, a bush, and the neighbor's house. Customer further claims that at the time of the accident, she had her foot on the brake pedal, that the brakes did not work, and that the impact occurred at approximately 15-20mph. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
882	CAMRY	2006	6/23/2006	Customer's attorney wrote regarding customer's 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged. A Field Technical Specialist (FTS) inspected the vehicle.
883	SIENNA	2005	6/23/2006	Customer called regarding his 2005 Toyota Sienna. Specifically, the customer claims, on unknown dates, the engine accelerates by itself, and the brakes don't respond well. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
884	Camry	2007	6/27/2006	Customer claims that the engine RPM surges when the transmission is shifting from third to fourth gear, the vehicle is traveling on a slight uphill, and a light throttle is applied. The vehicle transmission had been replaced on June 9, 2006, due to internal failure. The vehicle was tested and the problem duplicated, and it was ascertained by a snapshot that the engine revolution increases by 243 RPM for a second when the transmission shifts from third to fourth gear, and then drops by 550 RPM. No repair.
885	CAMRY	2007	6/27/2006	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that [on unknown dates] her vehicle failed to accelerate at a speed greater than 20 mph.
886	CAMRY	2004	6/28/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that his wife was in an accident on June 25, 2006. Customer further claims that while his wife was backing up, she took her foot of the accelerator but her vehicle continued to move. Customer claims that his wife ran into a building.
887	HIGHLANDER	2006	6/29/2006	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that on June 29, 2006, she was driving and when she released the throttle, her vehicle continued to move. Customer further claims that the vehicle stopped when she shut off the engine and applied the brakes.
888	CAMRY	2007	6/30/2006	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that [on unknown dates] her vehicle would shift and jerk. Customer further claims that the rpm would go up and the engine sounded very loud.
889	CAMRY	2006	6/30/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when he accelerated around 65-70 mph the vehicle jumped, and that when he pressed the brakes the steering shook.
890	PRERUNNER	2003	6/30/2006	Customer called regarding his 2003 Toyota Prerunner. Specifically, customer claims that on an unknown date, the throttle opened up as he tapped the accelerator, causing him to hit a parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
891	CAMRY	2005	6/30/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that he put the vehicle in reverse and it surged backwards two times. On another occasion, customer claims that his vehicle leaped while stopped at a crosswalk. Customer claims that cause him to hit a pedestrian and knocked him down. Customer claims that the sudden acceleration occurred while the vehicle the vehicle was already in motion and while the vehicle was at a stop.
892	SIENNA	2005	7/5/2006	Customer called regarding his 2005 Toyota Sienna. Customer claims that, on unknown dates, while he gets off the accelerator the vehicle appears to keep going without deacceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
893	PRIUS	2005	7/8/2006	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle jumped forward when in park. Customer further claims that while driving the air conditioning system would jump automatically to high. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
894	CAMRY	2003	7/10/2006	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle experienced unintended acceleration. Customer further claims that the vehicle displayed high rev when his foot was not on the gas pedal and surged forward at times.
895	AVALON	2006	7/10/2006	Customer called regarding her 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, she is concerned about her electronic control module.
896	CAMRY	2005	7/11/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown date, while putting the vehicle in drive, after having been in reverse, the vehicle jerked before moving. Customer further claims the vehicle idles on high when starting cold.
897	LAND CRUISER	2004	7/13/2006	Customer called regarding her 2004 Toyota Land Cruiser. Customer claims that on July 10, 2006, she was pulling into a parking space when the car jumped forward, crashing into another car. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
898	HIGHLANDER	2006	7/14/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that when he drives his vehicle at 30-40 mph, his vehicle will shift up on its own.
899	CAMRY	2007	7/14/2006	Customer called regarding his 2007 Toyota Camry CE. Specifically customer claims that [on unknown dates] his vehicle surged forward. Customer further claims that on a separate occasion his engine started cutting out and would not accelerate higher than 25 mph.

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1	Model	Model Year	Report or claim date	Summary
900	CAMRY	2004	7/17/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on June 26, 2006, while driving home he experienced a sudden unintended acceleration. Customer claims that she did not have her foot on the accelerator. Customer claims that the unintended acceleration caused her to hit her neighbor's garage and retaining wall.
901	COROLLA	2006	7/17/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle jumped when stopping and accelerating and jerked when slowing down.
902	COROLLA	2005	7/19/2006	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle's engine revved and the vehicle took off into the wall of her garage.
903	TUNDRA	2006	7/19/2006	Customer called regarding his 2006 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates, he has experienced stalling, surging, and hard starts with the vehicle.
904	CAMRY	2007	7/19/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he lets up on the gas pedal the vehicle will not slow down. Customer claims that the acceleration problem occurs while the vehicle is already in motion.
905	RX 330	2004	7/20/2006	Customer called regarding her 2004 Lexus Lexus RX 330. Specifically, customer claims that on unknown dates, her vehicle will accelerate on its own. A FTS inspected the vehicle.
906	CAMRY	2002	7/20/2006	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on July 13, 2006, his wife was driving the vehicle and pulling into a parking space when the vehicle took off and ran into a fence, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
907	CAMRY	2007	7/21/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] she experienced choppy deceleration and claims that the vehicle jumped forward when it was placed in drive and she took her foot off the brake pedal, her vehicle lurches forward. Customer further claims that this occurs when the vehicle is at a full stop. Customer claims that she has to push the accelerator pedal several times in order for the vehicle to accelerate, causing it to lurch. Customer alleges that the incidents occurred while the vehicle was stopped.
908	COROLLA	2005	7/21/2006	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated on its own when she was turning left into a parking spot at 2-3 mph, causing her to run into an island and another vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
909	CAMRY	2007	7/21/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has been experiencing "concerns with acceleration." The details of the underlying incident are unclear.
910	CAMRY	2004	7/24/2006	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on July 23, [2009], while coming out of a parking garage, his engine raced, causing the driver to hit three poles. Customer claims that a similar incident occurred once before in December of 2004 while pulling into a parking lot. Customer claims that the sudden acceleration incidents occurred while the vehicle was already in motion.
911	HIGHLANDER	2004	7/26/2006	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on either July 17 or 18, 2006, his wife was making a u-turn in the vehicle at 5mph when the vehicle accelerated on its own, colliding with another vehicle. Customer further claims that such acceleration has occurred four times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
912	PRIUS	2005	7/27/2006	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on July 26, 2006, he was in a drive-thru and the vehicle was running and the gas engine was turned off but when he turned on the air conditioner the engine came back on and the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
913	CAMRY	2002	7/28/2006	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on July 13, 2006, the vehicle suddenly accelerated after she pulled into a parking space, causing her to hit a stockade fence. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer further claims that she had experienced a thrush forward with the vehicle before.

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1	Model	Model Year	Report or claim date	Summary
914	MATRIX	2006	7/28/2006	Customer called regarding her 2006 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, the vehicle surged forward while her mother was driving, causing a small accident. Customer further claims that at the time of the accident, her mother had her foot on the brake pedal. Customer further claims that at unknown dates, the vehicle surged three different times while she was waiting at a light with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
915	HIGHLANDER	2006	7/31/2006	Customer called regarding her 2006 Toyota Highlander Ltd. Specifically, customer claims that on unknown dates and approximately ten times, her vehicle sped up after taking her foot off the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
916	CAMRY	2005	7/31/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that upon starting the vehicle, while the vehicle was already in park, the vehicle just took off. Customer claims that he was not able to stop the vehicle, causing him to rear-end another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a stop.
917	CAMRY	2005	8/1/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, the vehicle surges and jumps forward when the vehicle is going about 20 mph.
918	PRIUS	2006	8/1/2006	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on unknown dates the engine kicked on even though the vehicle was stopped or driving slow. Customer further claims that the engine surged.
919	HIGHLANDER	2006	8/1/2006	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that her vehicle continuously slows and then speeds up when she tries to drive it at a steady speed, and that when she tries to brake, the vehicle speeds up.
920	COROLLA	2006	8/2/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle jumped forward through a gate and hit a tree.
921	TACOMA	2006	8/2/2006	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle's throttle stuck, and the vehicle did not slow down when he took his foot off of the gas pedal. Customer further claims that it took 15 to 20 seconds for the rpms to go down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
922	HIGHLANDER	2006	8/3/2006	Customer called regarding his 2006 Toyota Highlander LTD. Specifically, customer claims that on unknown dates, while his wife is driving, the vehicle accelerates after she takes her foot off the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
923	CAMRY SOLARA SLE	2004	8/3/2006	Customer called regarding her 2004 Toyota Camry Solara SLE. Specifically, customer claims that on July 28, 2006, she was pulling her vehicle in front of her garage door and as she started to open the garage door, the vehicle accelerated on its own. Customer further claims that the vehicle drove through the back of the garage, through customer's chain link fence, and into a pole of her neighbor's chain link fence, where the vehicle came to a stop.
924	TACOMA	2006	8/4/2006	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle idled so high that it accelerated itself when in reverse. Customer further claims that the brakes constantly squeaked. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
925	ES 330	2005	8/7/2006	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on an unknown date, she was trying to park her vehicle when it accelerated and ran into a building.
926	TUNDRA	2006	8/7/2006	Customer called in regarding a 2006 Toyota Tundra. Specifically, the customer claims that, on unknown dates, the vehicle has high RPMs.
927	4RUNNER SR5	2001	8/8/2006	Customer called regarding his 2001 Toyota 4 Runner SR5. Specifically, customer claims while his girlfriend while driving the vehicle on August 6, 2006, the vehicle took off as soon it was placed into drive. Customer further claims the vehicle struck cars and went through a fence and eventually end up laying on the passenger side of the vehicle. A Field Technical Specialist (FTS) inspected vehicle. Customer claims the sudden acceleration occurred while the vehicle was at a stop.
928	CAMRY	2006	8/9/2006	Customer emailed regarding her 2006 Toyota Camry. Specifically customer claims that on unknown dates the RPMs revved high when starting up, and she had to hold the brake hard because the vehicle wanted to move forward. Customer further claims that the vehicle pinged. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
929	CAMRY	2007	8/9/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle hesitated. FTS investigated the incident and found that the vehicle was operating as designed.
930	HIGHLANDER	2005	8/9/2006	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on November 9, 2004, he was pulling into his garage and couldn't stop, and drove through the back wall of the garage.
931	MATRIX	2006	8/10/2006	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates, the vehicle jumped when he pushed on the gas pedal. Customer further claims that the vehicle's pickup was not smooth.
932	RAV 4	2006	8/11/2006	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle lurched forward and RPMs rose. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
933	RAV 4	2005	8/14/2006	Customer called regarding her 2005 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle surged forward on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
934	HIGHLANDER	2005	8/14/2006	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that when his foot is off the gas pedal, the vehicle will accelerate to 45 mph.
935	AVALON	2006	8/15/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lunged forward when he applied the gas.
936	CAMRY	2002	8/16/2006	Insurer called on behalf of customer. Specifically, insurer claims that on August 15, 2006, the vehicle accelerated forward after the driver took her foot off of the accelerator pedal because the pedal stuck, causing her to run over a parking curb and hit a fence, newspaper stands, and a steel beam. Insurer further claims that a similar incident occurred four months ago, in which the driver hit another vehicle.
937	TUNDRA	2006	8/18/2006	Customer called regarding his 2006 Toyota Tundra. Specifically, customer claims that on unknown dates, the vehicle surged when his son tried to stop, and his son had to apply the brakes heavily. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
938	RAV 4	2006	8/21/2006	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, he was making a turn and he vehicle revved up, causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
939	CAMRY	2004	8/21/2006	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on August 16, 2006, the vehicle took off causing a collision with a cement barrier and a pole. Customer claims that that the sudden acceleration occurred while backing out of a parking spot.
940	CAMRY	2006	8/22/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when he was slowing down or coming to a stop, the vehicle lunged slightly.
941	CAMRY	2006	8/23/2006	Customer called regarding her 2006 Toyota Camry SE. Specifically, customer claims that on an unknown dates, her vehicle has had issues with jerking, stalling, revving, or gunning.
942	CAMRY	2006	8/23/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on August 16, 2006, she backed out of a parking space, then stopped and put the vehicle in drive, and the vehicle took off and hit two parked vehicles. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
943	CAMRY	2004	8/24/2006	Customer called regarding her 2004 Toyota Camry LE. Specifically, customer claims that on March 23, 2006, her vehicle surged forward and shifted to a different gear while she was driving at 30-35mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
944	HIGHLANDER	2005	8/25/2006	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that her vehicle hesitates when she tries to accelerate past another vehicle. Customer further claims that this hesitation occurs when she is driving normally.
945	SIENNA	2005	8/28/2006	Customer called regarding her 2005 Toyota Sienna. Specifically, the customer claims that on August 15, 2006, the vehicle hesitated before accelerating. Customer further claims she almost lost her life as a result of the sudden, delayed acceleration. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
946	HIGHLANDER	2005	8/30/2006	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that when she presses the accelerator, the vehicle holds back on accelerating and then lurches forward.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
947	CAMRY	2007	8/30/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he feels unsafe in his vehicle because of the acceleration of the vehicle. The details of the underlying incident are unclear.
948	IS 300	2002	8/30/2006	Customer called regarding her 2002 Lexus IS 300. Specifically, customer claims that at an unknown date, her vehicle continued to accelerate rapidly, out of her control, when she tried to pass another vehicle. Customer further claims that she had trouble breaking and that the engine continued to race after she pulled over to the side of the road. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
949	HIGHLANDER	2005	8/30/2006	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that when he steps on the pedal quickly, the vehicle is not responsive.
950	CAMRY	2007	8/30/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he descends a hill and has the cruise control on, the vehicle accelerates to approximately 15 miles per hour ahead of the set speed. Customer further claims that he does not like the foot pedal in the vehicle. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
951	TACOMA	2006	8/31/2006	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle revved up to 3000 RPM upon cold start up, and that when driving at 65 mph the RPM was 3000 and that the RPM stuck at 3500 when the clutch was depressed.
952	TUNDRA	2005	8/31/2006	Customer called regarding his 2005 Toyota Tundra SR5. Specifically, customer claims that at unknown dates, his vehicle lunged as he was coming or going from a stop. Customer further claims that the vehicle lunged forward when he tried to accelerate. A Field Technical Specialist (FTS) inspected the vehicle.
953	CAMRY	2005	9/1/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on two occasions, the accelerator got stuck. On the first two occasions, customer claims his wife hit a rock. On the second occasion, July 29, 2006, customer claims that while his wife was parking the vehicle, it suddenly accelerated forward, jumped a curb, and hit a wall. On the final occasion, customer claims there was no damage.
954	CAMRY	2005	9/1/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on two occasions, the accelerator got stuck. On the first two occasions, customer claims his wife hit a rock. On the second occasion, July 29, 2006, customer claims that while his wife was parking the vehicle, it suddenly accelerated forward, jumped a curb, and hit a wall. On the final occasion, customer claims there was no damage.
955	AVALON	2006	9/1/2006	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, he had concerns with hesitation on acceleration. A Field Technical Specialist conducted an investigation and did not find any concerns with the vehicle and everything appeared to be operating as designed.
956	CAMRY	2005	9/5/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on September 3, 2006, she was pulling into a parking lot, when the vehicle started to vibrate and the check engine light came on. Customer claims that, after parking, she put the vehicle into park, and the vehicle jumped into gear, jumped a curb, and ran into a wall.
957	AVALON	2006	9/5/2006	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, his vehicle speeds up when the brake pedal is applied. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
958	PRIUS	2005	9/5/2006	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
959	CAMRY	2007	9/5/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced an acceleration issue and that he is uncomfortable driving the car in high traffic areas due to the issue. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
960	ES350	2007	9/7/2006	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, customer's son could not stop the vehicle with the brakes. Customer claims that the vehicle kept accelerating by itself up to 50 - 60 mph and the cruise control was off. Customer claims that he tried to stop the vehicle but was unable to do so and crashed the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
961	CAMRY	2006	9/7/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on August 16, 2006, his wife was driving and when she put the vehicle in drive after backing up, the vehicle lurched ahead and became wedge between two other vehicles. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
962	CAMRY	2005	9/7/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, she was having issues with the vehicle lunging forward when the pedal is slightly depressed. On the second time this issue occurred, customer claims the lunging caused her to run over the curb.
963	CAMRY	2007	9/8/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle jumped when accelerating.
964	CAMRY	2007	9/8/2006	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that [an on unknown date] her vehicle surged forward as she was approaching a stop sign. Customer further claims that the vehicle coasted forward before coming to a stop.
965	CAMRY	2007	9/12/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] her vehicle hesitated upon accelerating and then surged forward.
966	RAV 4	2006	9/12/2006	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, the vehicle moved backward instead of forward when his wife started it, causing it to hit a garage door and post. Customer further claims that his wife had the car in "drive" when this occurred, and that the engine did not respond properly when she stepped on the gas pedal.
967	AVALON	2006	9/12/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle has a jerking response when accelerating at very low speeds.
968	CAMRY	2005	9/12/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on September 11, [2009], while trying to park the vehicle, it surged forward and hit a concrete median. Customer claims that she hit two vehicles in oncoming traffic. Customer claims that his foot was on the brake at the time of the acceleration.
969	CAMRY	2007	9/12/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle hesitates while accelerating. Customer further claims that the hesitation often occurs when taking a turn, specifically she claims that the vehicle hesitates for a couple seconds before taking off.
970	RX 330	2005	9/13/2006	Customer called regarding his mother's 2005 Lexus RX 330. Specifically, customer claims that at an unknown date, the vehicle surged suddenly as his mother was driving, causing her to drive through curbs in a parking lot.
971	LS 430	2005	9/15/2006	Customer claims that there was a slight jerk when accelerating, and the vehicle did not shift gears smoothly. The software calibration ID was checked. Learned values were cleared and the vehicle was test-driven to help with the ECM relearning.
972	CAMRY	2005	9/18/2006	Customer called regarding his daughter's 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle shot back unexpectedly and struck a tree when his daughter put the vehicle in "reverse." Customer further claims that the accelerator pedal moved by itself, and that at the time of the accident, the driver attempted to brake but could not do so. Customer further claim's that on September 11 and 17, 2006, the car accelerated on its own. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
973	AVALON	2006	9/19/2006	Customer emailed regarding his 2006 Toyota Avalon. Specifically, customer claims that on September 14, 2006 the vehicle surged forward when his wife was parking the vehicle with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
974	CAMRY	2005	9/19/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on September 15, 2006, while in reverse, the vehicle jumped out of gear and accelerated. Customer claims the vehicle suddenly lunged backwards and she went about 17 feet, and hit another vehicle.
975	RAV 4	2006	9/25/2006	Customer called regarding hier 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck.
976	SIENNA	2006	9/25/2006	Customer called regarding his 2006 Toyota Sienna. Specifically, customer claims that on unknown dates, the vehicle will maintain its speed for a half mile after he removes his foot from the gas pedal. Customer claims that the sudden acceleration occurs while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
977	HIGHLANDER	2006	9/25/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that his vehicle picks up speed when he enters second gear. Customer further states that the vehicle does not slow down when his foot is removed from the accelerator because the rpms are too high, and that this condition exists even when he presses on the brake. Customer states that he has to put his vehicle into neutral to make it stop. A Field Technical Specialist inspected the vehicle.
978	CAMRY	2003	9/26/2006	Customer called regarding his wife's 2003 Toyota Camry LE. Specifically, customer claims that on July 26, 2006, the vehicle accelerated forward unexpectedly as he tried to make a u-turn in a parking lot, causing him to hit other vehicles. Customer further claims that at the time of the accident the brake pedal did not work. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
979	AVALON	2006	9/26/2006	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on at least 6 occasions, she has taken the vehicle to the dealer to address problems with acceleration and alignment.
980	PRIUS	2001	9/26/2006	Customer called regarding his 2001 Toyota Prius. Customer claims that on September 25, 2006, his wife was driving on a highway when vehicle began to lose power. Customer was traveling up a hill and wanted to have car on flat surface so reversed down the hill. Throttle was to the floor to keep motor from stalling out. Engine cleared and vehicle took off in reverse and struck a guardrail. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
981	CAMRY	2005	9/27/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on September 15, 2006, while in reverse, the vehicle jumped out of gear and accelerated. Customer claims the vehicle suddenly lunged backwards and she went about 17 feet, and hit another vehicle.
982	CAMRY	2007	9/28/2006	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that after she turned left from a stopped position her vehicle surged and accelerated from about 20 mph to 50 mph, causing her to zig in and out of traffic for approximately three miles. Customer further claims that nothing happened when she pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
983	HIGHLANDER	2006	9/28/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that his vehicle picks up speed when he enters second gear. Customer further states that the vehicle does not slow down when his foot is removed from the accelerator because the rpms are too high, and that this condition exists even when he presses on the brake. Customer states that he has to put his vehicle into neutral to make it stop. A Field Technical Specialist inspected the vehicle.
984	CAMRY	2002	10/3/2006	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on September 28, 2006, the vehicle surged forward, causing her to hit another vehicle. Customer further claims that at the time of the accident, she had her foot on the brake pedal. A Field Technical Specialist (FTS) inspected the vehicle.
985	CAMRY	2007	10/3/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle will surge when driving at a rate of 35 mph. Customer further claims that when the car drives down a hill on cruise control it feels like the vehicle is shutting down.
986	SIENNA	2006	10/4/2006	Customer called regarding his 2006 Toyota Sienna. Specifically, customer claims that on unknown dates, the vehicle started to accelerate, kicked out of gear, and its RPMs shot up when he attempted to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
987	AVALON	2006	10/5/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward when in cruise control, and hopped between gears when driving at 30 to 35 mph. Customer further claims that the vehicle jerked when the vehicle's transmission shifted from one gear to another. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
988	CAMRY	2005	10/5/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, she felt her vehicle was jerking. Customer further claims that sometimes the vehicle hesitates when going around a corner or when downshifting. Customer claims that that on some occasions, when trying to accelerate, the vehicle downshifts too far and the engine races but does not accelerate much.
989	CAMRY	2007	10/6/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle hesitates when driving. Customer further claims that when shifting from reverse to drive the vehicle shoots out.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
990	4RUNNER	2006	10/9/2006	Customer called regarding her 2006 Toyota 4Runner. Specifically, customer claims that on unknown dates when the vehicle was at a stop sign, the vehicle would speed up and move forward or idle low with low RPMs. Customer further claims that she had to hold down on the brake when she was at a stop because she was concerned that the vehicle might hit the vehicle ahead of it. Customer claims that this happened more often when the air conditioner was on.
991	SIENNA	2006	10/9/2006	Customer called regarding his 2006 Toyota Sienna. Specifically, customer claims that, on unknown dates, after he pushes on the gas pedal, the vehicle stalls then lurches forward. Customer claims that the sudden acceleration occurred when the vehicle is already in motion.
992	CAMRY	2005	10/9/2006	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on September 2, 2006, her daughter was killed in an accident while driving the vehicle in which she hit a guard rail at 70mph and flipped over three times. Customer further claims that the vehicle was not driving well prior to the accident.
993	RAV 4	2006	10/10/2006	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle revved up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
994	RAV 4	2006	10/10/2006	Customer called about his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, the car suddenly accelerated while he was on cruise control. Customer claims the sudden acceleration happened while the vehicle was already in motion.
995	4RUNNER LIMITED	2003	10/10/2006	Customer called regarding her 2003 Toyota 4 Runner. Specifically, customer claims that on September 6, 2006, her customer was involved in an accident when her vehicle accelerated automatically. Customer further claims that as she approached a stop light, the vehicle accelerated automatically when the brake was applied and eventually the vehicle flipped over. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
996	CAMRY SOLARA	2005	10/12/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on October 12, [2009], while pulling into a parking spot, the vehicle surged forward causing a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
997	TACOMA	2006	10/13/2006	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that when he is driving his vehicle and lifts his foot off the gas pedal, the engine RPM does not go down. Customer further claims that when he places the clutch into the next gear, the vehicle lurches. Customer claims that the a/c compressor makes a noise after an hour, that the throttle sticks, and that the vehicle gets poor gas mileage. Customer claims that brakes feel "mushy." Customer claims that the sudden acceleration occurs while the vehicle is already in motion.
998	CAMRY	2007	10/13/2006	Customer called regarding his sisters 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his sister experiences a delay when entering the highway. Customer further claims that the delay will last 2-3 seconds and then the vehicle will lunge forward.
999	CAMRY SOLARA SLE	2004	10/16/2006	Attorney General called on behalf of customer called regarding her 2004 Toyota Camry Solara SE. Specifically, customer claims that on an unknown date, her vehicle accelerated on its own as she was pulling in front of her garage door, causing her to crash through the back of the garage and into the neighbor's backyard pool fence. Customer further claims that at the time of the accident she had her foot on the brake pedal.
1000	SIENNA	2004	10/16/2006	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on October 13, 2006 she was driving the vehicle when it unintentionally accelerated, causing her to cross the median and hit another vehicle in oncoming traffic.
1001	CAMRY SOLARA	2007	10/18/2006	Customer emailed regarding her 2007 Toyota Camry Solara SLE (V6). Specifically, customer claims that on unknown dates her vehicle revved high on cold mornings. Customer further claims that on an unknown date, when she was in her garage, she put the vehicle in drive and it shot forward. She then put it in reverse and it raced backward out of her driveway and into a parked car. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1002	4RUNNER	2005	10/18/2006	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that when the vehicle is at a stop light and the air conditioning turns on, the engine surges from 250 to 300 RPMs. Customer further claims that when he uses the cruise control and goes up a hill, the vehicle does a "hard downshift."

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1003	TACOMA	2007	10/18/2006	Customer called regarding 2007 Toyota Tacoma Prerunner L/B. Specifically, customer claims that his son was driving the vehicle and that the vehicle was at a full stop when the vehicle started accelerating and took off. The vehicle was allegedly in an accident as a result of this issue, but did not strike any other vehicles. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred when the vehicle was at a full stop.
1004	LS 430	2001	10/19/2006	Customer called regarding his 2001 Lexus LS 430. Customer claims that on an unknown date, he experienced an incident involving unintended acceleration.
1005	IS350	2006	10/19/2006	Customer called regarding his 2006 Lexus IS 350. Customer claims that on October 13, 2006, his wife was driving when the vehicle jumped into high acceleration and RPM. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1006	CAMRY	2007	10/20/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates her vehicle hesitated during highway and city driving. Customer further claims that her vehicle braked too hard when she applied the brakes, which she believes caused another vehicle to hit her from behind.
1007	TACOMA	2006	10/20/2006	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle idles at a high RPM upon starting up in cold weather. A Field Technical Specialist (FTS) inspected the vehicle.
1008	AVALON	2005	10/20/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's engine raced and the vehicle shot forward when he stopped at a light and then stepped on the gas. Customer further claims that when he drove 30 mph and then came to a stop, the vehicle's air conditioning cut off and the engine stalled. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1009	CAMRY	2006	10/23/2006	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when he pressed on the accelerator, there was a delay in the engine, then the vehicle skipped.
1010	SIENNA	2004	10/24/2006	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on October 20, 2006, his wife was operating the vehicle when it accelerated into an iron gate, and then the vehicle surged backwards causing damage to a neighbors yard.
1011	COROLLA	2006	10/25/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on October 24, 2006 the vehicle surged, jumped a concrete curb and ran into the side of a shop when she applied the brake while she was pulling into a parking stall. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1012	4RUNNER SR5	2001	10/25/2006	Customer called regarding her 2001 Toyota 4Runner SR5. Specifically, customer claims that on unknown dates, her vehicle surges forward when she presses the accelerator.
1013	AVALON	2006	10/26/2006	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle's transmission surged when driving at 5 to 20 mph. Customer further claims that the vehicle's cruise control surged when accelerating with the cruise control engaged. Customer further claims that the vehicle accelerated to over 6000 RPM when speeding down the freeway. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1014	LS 430	2006	10/27/2006	Customer called regarding his 2006 Lexus LS 430. Specifically, customer claims that on an unknown date, the vehicle jerked back unexpectedly when his wife tried to put it in "reverse" in a parking lot. Customer further claims that at the time of the accident the engine raced.
1015	LS 430	2001	10/27/2006	Customer called regarding her 2001 Lexus LS 430. Specifically, customer claims that on unknown date in January of 2005, the engine roared and the car slammed into a concrete stand as her husband was backing out of a parking spot. A FTS inspected the vehicle.
1016	CAMRY SOLARA	2005	10/30/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, he has been periodically having trouble with his vehicle. The customer claims, that the acceleration seems to happen mostly while going up a slight incline. Customer claims that it seems to happen every few weeks. Customer claims that the sudden acceleration occurred while the vehicle is already in motion.
1017	AVALON	2005	11/1/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates he has experienced issues with the brakes, acceleration, hesitation and cruise control.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1018	AVALON	2005	11/1/2006	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged at speeds from 20 to 40 mph or when merging into traffic. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1019	CAMRY	2007	11/1/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the engine hesitates and jerks when he accelerates and brakes. Customer further claims that the carpeting on the cabin floor of the vehicle does not fit properly. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1020	MATRIX	2006	11/2/2006	Customer called about her 2006 Toyota Corolla Matrix STD. Specifically, customer claims that on an unknown date, the car lurched forward causing damage to her car.
1021	COROLLA	2007	11/6/2006	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle surged and lost control and the brakes didn't work. Customer further claims that she then turned on a side street and the vehicle slowed down and the brakes worked.
1022	TACOMA	2005	11/6/2006	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims he lost control of the vehicle due to issues with the throttle body and accelerator. It is unknown if FTS inspected the vehicle. The customer further claims the acceleration occurred when the vehicle is already in motion.
1023	COROLLA	2006	11/6/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's engine revved up and the brakes did not work. Customer further claims that this has happened four times, and that she had to put the vehicle into neutral in order to come to a stop.
1024	MATRIX	2006	11/6/2006	Customer called regarding her 2006 Toyota Corolla Matrix. Customer claims that engine surges and lunges by itself.
1025	COROLLA	2006	11/9/2006	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle revved and would not stop when going at low speeds.
1026	HIGHLANDER	2006	11/9/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on unknown dates, the vehicle surged when he was driving and when he came to a stop. Customer further claims that the vehicle jerked to a stop when the cruise control was on.
1027	ES 330	2004	11/10/2006	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, the vehicle lurched when merging onto the highway.
1028	AVALON	2006	11/10/2006	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jumped ahead quickly and the engine revved loudly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1029	CAMRY	2007	11/13/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle accelerated when he attempted to bring the vehicle to a stop.
1030	CAMRY	2005	11/13/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, while making a turn, the vehicle went dead and then lurched to approximately 50mph.
1031	CAMRY	2005	11/13/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 5, 2006, she drove her vehicle through a store front window. Customer claims that she was driving about 5 mph, she applied the brakes but the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1032	CAMRY	2007	11/13/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle lurches forward when she puts it into drive. Customer further claims that she notices delays when shifting. Customer alleges that she believes the problem is due to the vehicle being set on a very high idle. Customer further alleges that the problem occurs more frequently when the engine is cold.
1033	COROLLA	2007	11/17/2006	Customer called about his 2007 Toyota Corolla LE. Specifically, customer claims that on an unknown date, the car surged.
1034	COROLLA	2006	11/20/2006	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on November 17, 2006, the vehicle surged twice while stopped at red lights. Customer further claims that the vehicle revved unexpectedly.
1035	YARIS	2007	11/20/2006	Customer called regarding his 2007 Toyota Yaris. Specifically, the customer claims that on unknown dates, the vehicle will unintentionally accelerate and decelerate while operating at highway speeds.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1036	CAMRY	2005	11/21/2006	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on November 11, 2009, while backing out of a parking spot, his vehicle accelerated, causing him to crash into a parked school bus. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1037	ES350	2007	11/22/2006	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that in January 2010 the vehicle surged forward while she was driving it outside of a rest station. Customer further claims that she had to put the vehicle in neutral to regain control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1038	CAMRY	2003	11/22/2006	Customer called regarding her 2003 Toyota Camry SE. Specifically, customer claims that on unknown dates, her vehicle overaccelerates. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1039	COROLLA	2005	11/27/2006	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle took off and accelerated on its own when going in reverse after pressing on the gas. Customer further claims that this has happened five times, and that he put the parking brake on and turned off the vehicle to return the vehicle to normal.
1040	HIGHLANDER	2005	11/27/2006	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that his gas pedal sticks a little.
1041	LS 430	2002	11/28/2006	Customer called regarding his 2002 Lexus LS 430. Specifically, customer claims that on November 27, 2006, the vehicle suddenly surged as his wife was pulling into the garage, causing her to run into the wall of the house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1042	CAMRY	2007	11/28/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] the vehicles engine cuts out when driving on a slight downgrade. Customer alleges that the condition occurs while the vehicle is already in motion.
1043	GS 300	2006	11/29/2006	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date, her vehicle's cruise control system suddenly engaged as she accelerated, causing her to have problems stopping the vehicle. Customer further claims that she had to use the emergency brake to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1044	LS 400	1999	11/30/2006	Customer called regarding his 1999 Lexus LS 400. Specifically, customer claims that on unknown dates, his vehicle accelerated faster than normal. Customer further claims that this occurred both when he pressed the gas pedal, and when he did not.
1045	TACOMA	2006	11/30/2006	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
1046	CAMRY	2005	12/4/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle accelerates in the morning. Customer further claims that the vehicle does not work smoothly.
1047	HIGHLANDER	2006	12/4/2006	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on November 26, 2006, his wife was driving the vehicle when the accelerator pedal stuck, and she could not stop the vehicle. Customer further claims that on a previous occasion, he once tried to put the vehicle in cruise control and the accelerator stuck.
1048	4RUNNER	2005	12/5/2006	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates that the vehicle had an "idle issue" that caused the vehicle to go up hills by itself. Customer further claims that she had to hold the brake down hard to keep the vehicle from moving.
1049	HIGHLANDER	2006	12/5/2006	Boyfriend called on behalf of customer regarding her 2006 Toyota Highlander LTD. Specifically, caller claims that on unknown dates, her vehicle experienced an acceleration surge while it was being driven. Caller claims that the sudden acceleration occurred while the vehicle was already in motion.
1050	CAMRY	2007	12/6/2006	Customer emailed regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that [on unknown dates] the engine runs when the car is stopped waiting at a red light. Customer alleges that the incidents occurred while the vehicle was stopped.
1051	CAMRY	2005	12/6/2006	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that while pulling into a parking space, her vehicle stalled, it accelerated and hit a wall. Customer claims that she had her foot on the brake.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1052	TUNDRA	2005	12/7/2006	Customer called regarding his 2005 Toyota Tundra. Customer claims that on an unknown date, the accelerator pedal stuck and then broke. Customer claims that the vehicle continued accelerating and brakes would not work. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1053	TACOMA	2006	12/7/2006	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle changes gears in certain situations. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
1054	TACOMA	2006	12/8/2006	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle idles high. It is unknown if FTS inspected the vehicle. The customer further claims the high idle occurs when the vehicle is at a complete stop.
1055	COROLLA	2006	12/8/2006	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle had a jackrabbit start while pulling off from a stop sign.
1056	4RUNNER	2006	12/11/2006	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that on unknown dates the engine speed increased 250 RPMs when the air conditioning compressor kicked in. Customer further claims that the vehicle "rolled through" light brake pressure. Customer claims that the unintended acceleration occurred while the vehicle was at a full stop.
1057	CAMRY	2007	12/11/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced acceleration issues with the vehicle. The particulars of the underlying incident(s) are unclear.
1058	CAMRY	2007	12/11/2006	Customer called from a customer's attorney regarding the customer's 2007 Camry. The attorney seeks to pursue a Lemon Law demand due to alleged issues with the customer's engine. Attorney claims that customer has experienced acceleration and engine noise.
1059	AVALON	2006	12/12/2006	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, when he steps on the gas, the vehicle will not move for a few seconds. Customer further claims that while in cruise control, the vehicle downshifts and then takes off to the set speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1060	TACOMA	2006	12/12/2006	Customer called regarding her 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle accelerated on its own and the brakes locked up on three separate occasions.
1061	CAMRY	2007	12/12/2006	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle hesitates while traveling up hill and then jerks forward. Customer further claims that when the vehicle is coasting with no pressure on the gas pedal, the RPM holds steady and slowly decreases. Customer alleges that both incidents occur while the vehicle was already in motion.
1062	HIGHLANDER	2005	12/13/2006	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that his vehicle heistates when he pulls it out into an intersection. Customer further claims that the vehicle shakes twice then jumps forward when taking off or turning on corner.
1063	TACOMA	2006	12/13/2006	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle's RPM is to high. It is unknown if FTS inspected the vehicle. It is unknown if the claimed condition occurs while the vehicle is already in motion.
1064	HIGHLANDER	2006	12/13/2006	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that her vehicle accelerates and lurches forward, and she feels that the effort to overcome the high idle is putting pressure on the brakes.
1065	ES350	2007	12/14/2006	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, she barely touched the vehicle and it took off. Customer further claims that when braking, the vehicle only slows down but it does not stop it.
1066	CAMRY	2002	12/15/2006	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on December 8, 2006, his wife was driving the vehicle and stopped at a red light when the vehicle revved and lunged forward, causing it to hit the vehicle in front of it. Customer further claims that the vehicle bounced back and then hit the vehicle in front of it a second time before the vehicle died. Customer further claims that his wife had her foot on the brake the whole time. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1067	IS250	2006	12/15/2006	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on unknown dates, the vehicle suddenly accelerated three times while vehicle was moving.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1068	TUNDRA	2006	12/18/2006	Customer called regarding his 2006 Toyota Tundra 4X4. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated to approximately 100 mph as he was merging onto the freeway. Customer further claims that at the time of the incident, he tried to apply the brakes, but the vehicle would not slow down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1069	CAMRY	2007	12/18/2006	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle fails to accelerate despite pressing on the accelerator pedal. Customer further claims that the vehicle will then kick into gear and rev to 6000 rpm. Customer alleges that the vehicle also hesitates when leaving an intersection.
1070	TACOMA	2006	12/18/2006	Customer emailed regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle revved up to 2300 RPM upon start up, and revved again when he backing out of his driveway.
1071	LS 460	2007	12/22/2006	Customer claims that the transmission hesitates and has a double bump when the vehicle accelerates after being stopped at a traffic light for more than a few seconds. The vehicle was test-driven and the problem was duplicated when the vehicle was placed in drive, the park hold feature was turned off, and the vehicle was stopped for greater than 45 seconds. No repair.
1072	CAMRY SOLARA SLE	2004	12/22/2006	Customer called regarding her 2004 Toyota Camry Solara SLE. Specifically, customer claims that on an unknown date, her vehicle suddenly surged as she was driving and then would not start. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1073	CAMRY	2007	12/22/2006	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he does not have the "proper acceleration" when he needs it. The particulars of the underlying incident(s) are unclear.
1074	CAMRY	2002	12/27/2006	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on December 23, 2006, her vehicle suddenly accelerated when she put her shifter in "reverse," causing her to hit three trees. Customer further claims that at the time of the accident she had her foot on the brake pedal. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the unintended acceleration occurred while the vehicle was at a full stop.
1075	TACOMA	2006	12/27/2006	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates he has had issues with the vehicle's throttle.
1076	TACOMA	2005	12/28/2006	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle revs when the engine is cold. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs while the vehicle is completely stopped during a cold start.
1077	AVALON	2005	12/29/2006	Customer called regarding his 2005 Toyota Avalon XLS. Specifically, customer claims that on unknown dates on three occasions, the vehicle accelerated on its own.
1078	RAV 4	2006	12/29/2006	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle jumped forward at low speeds and when the brake was released. The Field Technical Specialist (FTS) inspected the vehicle. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1079	HIGHLANDER	2007	1/2/2007	Customer called regarding her 2007 Toyota Highlander LTD. Specifically, customer claims that on unknown dates, her vehicle suddenly surged on the highway.
1080	SEQUOIA	2005	1/2/2007	Customer called regarding his 2005 Toyota Sequoia. Specifically, customer claims that on two occasions, December 4, 2006 and December 15, 2006, his vehicle suddenly accelerated and surged forward. Customer claims that the first incident occurred as he was turning into a parking space and that his foot was not on the gas pedal; customer claims that the second incident occurred as he was stopped at a stop sign.
1081	HIGHLANDER	2006	1/2/2007	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that her vehicle starts to lurch when she takes her foot off of the gas pedal, especially when she is on a slight downhill. Customer further claims that this condition is intermittent but happens every time she is on that hill.
1082	COROLLA	2007	1/2/2007	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle went about 10 mph without her stepping on the gas pedal.
1083	TACOMA	2006	1/3/2007	Customer called regarding her 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine up shifted while stopped if her foot was not firmly on the brake. Customer further claims that the vehicle's brakes squeaked when she pulled out of her garage in the morning.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1084	AVALON	2007	1/3/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates there was a surging concern with the vehicle at low speeds. Customer further claims that on unknown dates the RPMs went very high while driving at slow speeds and he had to hit the brakes very hard to stop the vehicle. Customer further claims that on an unknown date he had to turn off the ignition to stop the vehicle. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1085	TACOMA	2006	1/3/2007	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that when the vehicle was coming to a stop sign at five miles per hour, the accelerator failed, causing the vehicle to hit the back end of another vehicle. A Field Technical Specialist (FTS) inspected the vehicle.
1086	CAMRY	2006	1/4/2007	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when the vehicle was at a complete stop it lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1087	CAMRY	2004	1/4/2007	Customer called regarding his 2004 Toyota Camry LE. Customer claims that on January 4, 2007, the vehicle surged forward on its own as customer was shifting out of park, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1088	LX 470	2006	1/5/2007	Customer called regarding his 2006 Lexus LX 470. Customer claims that vehicle does not slow down when accelerator is not depressed. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1089	TACOMA	2007	1/8/2007	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears and that the vehicle will jump if shifted quickly. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
1090	CAMRY	2006	1/9/2007	Customer called regarding his 2006 Toyota Camry. Customer claims that on unknown dates he had concerns with the acceleration of the vehicle.
1091	TACOMA	2007	1/10/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine surged to 300 to 500 RPM every time the clutch was depressed and that the vehicle's engine made a howling sound.
1092	COROLLA	2007	1/11/2007	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle shot forward at 50-60 mph, causing him to run into an electrical gate, a palm tree, and a fence.
1093	IS 350	2006	1/12/2007	Customer claims that when the vehicle is started cold it is very sluggish and will surge for the first five minutes. Specifically, customer claims that if the accelerator is depressed when the condition occurs, the vehicle's speed will climb to 4,000 RPM, drop to 3,000 RPM and then continue to surge in between these RPMs. A video was taken of the condition as well as multiple snapshots. The condition felt like a low fuel pressure concern but it did not duplicate the concern. The Techstream was used to monitor the throttle condition and it revealed that the throttle position was closing prior to the drop in engine speed. The throttle body motor resistance was checked and was found to be very similar to another vehicle. The throttle body was swapped into a donor vehicle and the condition moved the donor vehicle. The vehicle was checked for diagnostic trouble codes, and none were found.
1094	CAMRY	2007	1/12/2007	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she has purchased a Lemon due to the way the vehicle drives. The particulars of the underlying incident(s) are unclear.
1095	TACOMA	2007	1/16/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's RPM rose to 2000 when shifting gears.
1096	CAMRY	2007	1/17/2007	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that [on unknown dates] her vehicle jerks when it accelerates and when it comes to a stop. Customer further claims that she hears excessive squealing from the brakes. Customer alleges that the condition occur in hot and cold weather.
1097	AVALON	2006	1/17/2007	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle hesitated and bucked and seemed to have a delay when he stepped on the gas.
1098	CAMRY	2007	1/17/2007	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that [on unknown dates] she loses slight control of her vehicle when accelerating and decelerating. Customer further claims that the vehicles engine revs, causing the RPM to go to 3,000. Toyota offered to have an FTS inspection but customer never responded.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1099	CAMRY SOLARA SE	2004	1/18/2007	Customer called regarding her 2004 Toyota Camry Solara SE. Specifically, customer claims that on an unknown date, her gas pedal would go to the floor when she put her foot on it, then rev and surge forward.
1100	CAMRY	2007	1/19/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle surges and that the RPM climbs while at a red light. Customer further claims that her vehicle is at high idle when the air conditioning is on.
1101	RAV 4	2006	1/20/2007	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own, causing her to hit the vehicle in front of her. The Field Technical Specialist (FTS) inspected the vehicle. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1102	PRIUS	2001	1/20/2007	Customer called regarding her 2001 Toyota Prius. Specifically, customer claims that on January 11, 2007, the gas pedal on her vehicle became stuck, causing her to crash into a wall of the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1103	ES350	2007	1/22/2007	Customer called regarding her 2007 Lexus ES 350. Customer called with concerns about unintended acceleration.
1104	CAMRY	2007	1/22/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has acceleration concerns about the vehicle. Customer further claims that vehicle jerks, drives strangely, and has a slow reaction time when he presses the gas pedal. Customer also claims that his son was driving the vehicle and switching lanes when the vehicle kept moving right to left, hit a curb and jumped up on the curb. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
1105	CAMRY	2007	1/22/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates his vehicle lunged forward while in a stopped position. Customer further claims that when his vehicle was stopped and he depressed the accelerator pedal typically nothing will happen and then the vehicle would lunge forward and take off. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1106	CAMRY	2006	1/24/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated when she stepped on the brake. A Field Technical Specialist inspected the vehicle.
1107	CAMRY	2007	1/24/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle surges at low throttle. Customer further claims that when he takes his foot off the clutch in first gear to accelerate the vehicle pauses before accelerating.
1108	AVALON	2005	1/24/2007	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward and shifted into a higher gear when he depressed the brakes. Customer further claims that the vehicle jumped in gear or hesitated when accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1109	CAMRY	2007	1/24/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the gas pedal is very sensitive. Customer further claims that he barely touches the gas pedal and the car takes off.
1110	CAMRY	2007	1/24/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the gears jerk and the RPMs go high when he takes his foot off the gas pedal. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1111	TACOMA	2007	1/25/2007	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to provide a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was at a complete stop.
1112	AVALON	2007	1/25/2007	Customer emailed regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates his vehicle lurched when engaging cruise control.
1113	HIGHLANDER	2006	1/25/2007	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that on January 23, 2006, her gas pedal got stuck, causing the vehicle to accelerate. Customer further claims that she pushed the brakes but the vehicle only slowed a little bit.
1114	AVALON	2007	1/26/2007	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, on three different occasions, his vehicle goes full throttle when the brakes are applied. It was determined that the vehicle was not defective.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1115	AVALON	2005	1/29/2007	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while coming up to a stop light, he heard the vehicle rev up, he accelerated and pushed the smart key button to turn vehicle off. Customer further claims that the vehicle made cranking noises and she tried to put it into neutral but it kept accelerating.
1116	CAMRY	2007	1/29/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle will hesitate and then jolt forward. Customer further claims that this has happened approximately six time.
1117	TACOMA	2005	1/29/2007	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly accelerates, but failed to provide a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the acceleration occurs when the vehicle is already in motion.
1118	RAV 4	2006	1/29/2007	Customer's husband called regarding her 2006 Toyota RAV4. Specifically, customer's husband claims that on an unknown date the vehicle surged forward, and he had to press on the brake to keep the vehicle from lunging forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1119	CAMRY	2007	1/30/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced concerned when accelerating. The particulars of the underlying incident are unclear.
1120	CAMRY	2005	1/31/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, while stopping at a stop sign, the vehicle shot forward. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
1121	CAMRY	2006	1/31/2007	Customer called regarding her 2006 Toyota Camry SE. Customer claims that on January 16, 2007, as she was exiting a parking lot, the accelerator stuck and customer swerved into a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1122	CAMRY	2007	1/31/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] her vehicle hesitated and then surged forward.
1123	CAMRY	2004	1/31/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, the customer was in an accident and her vehicle was totaled. Customer further claims that sudden acceleration was the cause of the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1124	CAMRY	2004	2/2/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle surged forward, and the RPMs increased. A Field Technical Specialist (FTS) inspected the vehicle. Customer further claims that vehicle jumped forward and hit a jeep. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1125	AVALON	2006	2/3/2007	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on unknown dates when he drove between 35 and 55 mph his vehicle surged. Customer further claims that sometimes when he slowed down the vehicle's engine would rev like it was in neutral and then surge forward at a faster speed. Customer further claims that when he tried to accelerate and his vehicle did not respond, when he pressed harder on the gas pedal his vehicle surged forward.
1126	PRIUS	2004	2/3/2007	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on January 1, 2007, he attempted to start the vehicle twice and failed. Customer further claims that on the third attempt, the vehicle started and when he shifted into drive, the engine raced and the vehicle launched forward rapidly even though the accelerator was not depressed. Customer further claims that the vehicle would not accelerating even though he applied maximum pressure to the brake pedal, and teh vehicle crashed into a garage. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1127	HIGHLANDER	2006	2/6/2007	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that when she presses on the brake pedal, the vehicle will surge forward before coming to a complete stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1128	HIGHLANDER	2006	2/7/2007	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on December 8, 2006, he was driving at 35-40 mph and was trying to avoid a deer and thus applied the brakes, but the accelerator pedal felt as though it was stuck. Customer further claims that there was a sucking motion on the accelerator pedal, and that the acceleration caused the vehicle to go down a ditch and hit a tree. Customer states that he tried braking but the vehicle would not stop. An FTS inspected the vehicle.
1129	CAMRY	2007	2/8/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the vehicle accelerates too fast. Customer further claims that when they start the vehicle, the starter makes a grinding noise.
1130	4RUNNER	2006	2/10/2007	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that on unknown dates he experienced approximately 10 instances in which the vehicle lunged and the motor raced when applying the brakes. Customer claims that the unintended acceleration occurred when the vehicle was at a full stop.
1131	CAMRY	2004	2/12/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, while the vehicle was stopped at stoplight vehicle races and when she accelerates the vehicle jumps. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1132	PRIUS	2006	2/12/2007	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on an unknown date the vehicle was coming to a stop and he removed his foot to accelerate and experienced a mild jerk.
1133	COROLLA	2007	2/13/2007	Rental company's claims agent called regarding customer's 2007 Toyota Corolla. Specifically, customer claims that on January 16, 2007 the vehicle accelerated on its own into a wall when driver was driving under 10 mph in an underground parking garage. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1134	HIGHLANDER	2006	2/13/2007	Customer called regarding his 2006 Toyota Highlander LTD. Specifically, customer claims that on February 7, 2007, his vehicle suddenly surged forward as his wife was pulling into a parking space, causing her to run over the curb and into a pillar. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1135	HIGHLANDER	2006	2/16/2007	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that his vehicle has a high idle.
1136	SIENNA	2006	2/20/2007	Customer called regarding his 2006 Toyota Sienna. Specifically, the customer claims that on unknown dates, the vehicle will jump forward and suddenly accelerate. The customer further claims the acceleration is causing excessive brake wear and that the acceleration occurs while the vehicle was already in motion.
1137	RAV 4	2007	2/20/2007	Customer's wife called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle moved forward, despite her pressing the brake and causing her to hit a tree. Customer's wife claims that the sudden acceleration occurred while the vehicle was already in motion.
1138	RAV 4	2007	2/21/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1139	CAMRY	2007	2/22/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle will begin to jerk and accelerate out of control.
1140	PRIUS	2006	2/23/2007	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1141	4RUNNER	2004	2/23/2007	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates the accelerator pedal stuck intermittently.
1142	TACOMA	2007	2/26/2007	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears and the RPMs will increase. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion and when at a complete stop.
1143	PRIUS	2004	2/26/2007	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on January 1, 2007, he attempted to start the vehicle twice and failed. Customer further claims that on the third attempt, the vehicle started and when he shifted into drive, the engine raced and the vehicle surged forward. Customer further claims that the brakes did not work and the vehicle plunged forward and crashed into a garage. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1144	RX 400h	2006	2/27/2007	Customer called regarding his 2006 Toyota RX 400h. Specifically, customer claims that on unknown dates, his vehicle surged forward as if he had simultaneously accelerated and down shifted. Customer further claims that this occurred when he slowed down from 50 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1145	COROLLA	2006	3/1/2007	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle's engine revved very high and the vehicle lunged forward while she was braking.
1146	CAMRY	2007	3/1/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle will jolt forward when coming to a stop. Customer further claims that it feels like the jolting occurs because the vehicle is missing a gear. Customer alleges that when he stops he puts the vehicle into neutral.
1147	PRIUS	2005	3/2/2007	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on March 1, 2007, he was driving out of a parking lot at 5 mph and when he entered the street, the vehicle surged to 30 mph. Customer further claims that he depressed the brake to gain control then pulled over and the vehicle eventually went back to normal idle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1148	AVALON	2006	3/2/2007	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, he has experienced unintended acceleration.
1149	TACOMA	2003	3/3/2007	Customer called in regarding his 2003 Toyota Tacoma. Specifically, the customer claims that on March 3, 2007, the vehicle suddenly surged while parking which caused a minor accident and property damage. The customer further claims the sudden acceleration occurred while the vehicle as already in motion, but under braking.
1150	TUNDRA	2006	3/5/2007	Customer called in regarding his 2006 Toyota Tundra. Specifically, the customer claims that on March 5, 2007, the vehicle suddenly accelerated while parking which caused a minor accident and property damage. FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle as already in motion.
1151	RX 330	2006	3/6/2007	Customer called regarding her 2006 Lexus RX 330. Specifically, customer claims that on unknown dates, her vehicle did not slow down, but instead increased in speed, when it was in cruise control traveling down hill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1152	CAMRY	2004	3/6/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, while the vehicle was stopped at stoplight vehicle races and when she accelerates the vehicle jumps. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1153	COROLLA	2007	3/7/2007	Insurance agent called regarding rental company's 2007 Toyota Corolla. Specifically, agent claims that on February 27, 2007 the vehicle's gas pedal stuck when the renter put the vehicle in reverse, causing him to run into a pole. Agent further claims that the renter then put the vehicle in drive and the pedal got stuck, causing him to run into a building.
1154	HIGHLANDER	2004	3/8/2007	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on February 20, 2007, she was pulling into a parking spot with her foot on the brake when the vehicle suddenly lurched forward, causing her to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1155	CAMRY	2003	3/9/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle suddenly jumped, causing her to side-swipe one vehicle and hit another vehicle. Customer further claims that this is her third accident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1156	FJ CRUISER	2007	3/10/2007	Customer called about her 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on unknown dates, the car's rpm jumps when she turns the steering wheel right or left at idle.
1157	AVALON	2007	3/12/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the transmission seemed to drop into low gear and then picked up. Customer further claims that there was a lot of jerking. Customer further claims that there was a whistling noise from around the passenger side door and the privacy screen made a clunking noise. Customer further claims that the engine was too noisy when starting up cold.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1158	CAMRY	2003	3/12/2007	Customer's son called regarding father's 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle suddenly accelerated, causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1159	CAMRY	2004	3/13/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, while the his was backing into parking space, upon acceleration to go back into the spot, the car began to accelerate and did not stop until it hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1160	CAMRY	2004	3/14/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on March 7, 2007, the vehicle was leaving a car was when the customer touched accelerator lightly and the vehicle accelerated within 3-5 seconds for about 50 feet until it hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1161	IS250	2007	3/14/2007	Customer called regarding her 2007 Lexus IS 250. Specifically, customer claims that on unknown dates the vehicle surged. Customer further claims that the vehicle hesitated when she put her foot on the gas, and that there was a burning smell when the air conditioner was on. Customer further claims that the vehicle made a lot of noise.
1162	CAMRY	2002	3/16/2007	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that in July 2006, the gas pedal in his vehicle became stuck, causing him to crash into a wall. Customer further claims that this accident caused the vehicle to catch on fire. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1163	RAV 4	2007	3/16/2007	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1164	CAMRY	2003	3/16/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on March 16, 2007, her vehicle suddenly surged, causing her to hit the car in front of her. Customer further claims that at the time of the accident, she tried to apply the brakes but they did not work. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1165	MATRIX	2006	3/19/2007	Customer called about his/her 2006 Toyota Matrix XR. Specifically, customer claims that on an unknown date, the car surged ahead when letting foot off the gas pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1166	CAMRY	2002	3/19/2007	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, the gas pedal on his vehicle became stuck, causing him to hit a building and catch fire. Customer further claims that at the time of the accident, he tried to apply the brakes but they did not work. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1167	CAMRY	2007	3/20/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle will hesitate at lower speeds and then lurch forward.
1168	CAMRY	2007	3/20/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] her vehicle lags when accelerating from a stop. Customer further claims that she can feel the vehicle surge and claims that the vehicle jumps when shifting gears.
1169	4RUNNER	2006	3/21/2007	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that the vehicle surges and jerks slightly. Customer further claims that the RPM fluctuates when idling.
1170	4RUNNER	2005	3/22/2007	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates when he was at a stop light and the air conditioning compressor came on, the engine surged from 250 to 300 RPMs. Customer further claims that he needed to put his foot hard on the brake to keep the vehicle from surging forward. Customer also states that when the vehicle went up a hill, it did a "hard downshift."
1171	CAMRY	2007	3/22/2007	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that [on unknown dates] when she presses the accelerator pedal her vehicle has a three second before it just takes off. An FTS is to investigate the problem.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1172	TACOMA	2006	3/23/2007	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on March 14, 2007 the vehicle accelerated from 2 or 3 mph to a great enough speed to damage a tree when he was pulling into a parking spot. Customer further claims that on unknown dates the vehicle experienced other instances of sudden acceleration, including one in which the vehicle accelerated on its own while his son was driving on the highway. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1173	HIGHLANDER	2004	3/23/2007	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on May 19, 2007, she was trying to park her vehicle when the accelerator stuck and the vehicle sped up, driving into a pile of snow.
1174	CAMRY	2007	3/27/2007	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that [on unknown dates] his vehicle surges at lower speeds. Customer further claims that when he presses the accelerator pedal after slowing the vehicle down, the vehicle jumps. Customer alleges that he only experiences this problem on surface streets and not the highway.
1175	CAMRY	2004	3/29/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that on March 20, 2007, she put vehicle in reverse and vehicle immediately accelerated almost full throttle on its own. Customer further claims that a minor accident resulted. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1176	CAMRY	2007	3/30/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicles engine races between gears and then jerks.
1177	SIENNA	2005	3/30/2007	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on unknown dates, the vehicle lunges when the gas pedal is pushed. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1178	IS 300	2004	4/4/2007	Customer called regarding his 2004 Lexus IS 300. Customer claims that on an unknown date, the vehicle accelerated on its own to 90 mph and the gas pedal had to be pried up. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1179	HIGHLANDER	2006	4/6/2007	Attorney called on behalf of customer regarding his 2006 Toyota Highlander. Specifically, caller claims that on unknown dates, the vehicle accelerated on its own when the driver moderately braked on a steep grade. Caller claims that the sudden acceleration occurred while the vehicle was already in motion.
1180	AVALON	2006	4/6/2007	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jerked when coming out of stops at slow speeds and that the vehicle accelerated extremely high when he used the cruise control. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1181	CAMRY	2007	4/6/2007	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date while driving on the freeway his vehicle accelerated full force and did not slow down when he depressed the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1182	HIGHLANDER	2006	4/9/2007	Customer called regarding her 2006 Toyota Highlander LTD. Specifically, customer claims that on April 4, 2007, her husband was driving down their steep driveway with his foot on the brake when the vehicle accelerated on its own, causing a collision with the neighbors' retainer wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1183	RX 350	2007	4/11/2007	Customer called regarding her 2007 Lexus RX 350. Specifically, customer claims that on an unknown date, the engine in her vehicle surged.
1184	CAMRY	2003	4/11/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on two unknown dates, her vehicle suddenly accelerated as she was trying to de-accelerate on highway off-ramps. Customer further claims that at the time of the incident, she applied the brakes and put the vehicle in "park" to make it stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1185	CAMRY	2005	4/13/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle surges forward on take off from a stop or when the vehicle slows down to drive around a corner. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1186	ES 330	2005	4/14/2007	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated on its own while his wife was trying to park, causing her to run into the wall of a building. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1187	CAMRY	2006	4/17/2007	Customer claims that vehicle surges on light to moderate acceleration. Customer's complaint verified; tech stream used and found that A/F sensor reads 4.99 volts during surge. Vehicle was test driven after A/F sensor was disconnected, and concern was resolved. A/F sensor replaced and concern was resolved.
1188	CAMRY	2005	4/17/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on April 16, 2007, she had to swerve in order to avoid hitting a man and his dog, who suddenly stepped onto the street. Customer further claims that, upon maneuvering the vehicle out of the swerve, the vehicle accelerated and revved up uncontrollably. Customer further claims that she stepped on the brake and the brakes did not work and that she put the gear shift into park and the vehicle still continued out of control until she was able to steer the car up a hill where she regained control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1189	CAMRY	2007	4/17/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle would surge when it was traveling on cruise control. Customer further claims that the vehicle speeds and then decelerates. Customer alleges that this condition occurs while the vehicle is already in motion.
1190	CAMRY	2004	4/17/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, she had an accident with the vehicle in a parking stall. Customer further claims that the vehicle launched forward and hit a pole when shifting from drive to park. Customer further claims that same incident occurred three times at a stop sign or light until this 4th time where she hit the pole. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1191	TACOMA	2006	4/19/2007	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on April 17, 2007 the vehicle's engine revved and the accelerator kicked in as he was making a turn around a gas station pump, causing him to run into a wall. Customer further claims that before arriving at the gas station, he was driving on the highway with cruise control at 65 mph. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1192	COROLLA	2007	4/20/2007	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator was sticking.
1193	CAMRY	2004	4/23/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that, April 22, 2007, she was turning into a parking lot and, after vehicle made the turn, the vehicle started to accelerate on its own. Customer claims she had no control over the vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1194	AVALON	2005	4/23/2007	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on February 26, 2007 the vehicle's engine raced while he was coming to a stop light, causing him to rear end another vehicle. Customer further claims that on April 19, 2007 the same thing happened, causing him to rear end another vehicle and run into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1195	CAMRY	2007	4/24/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that her vehicle idles high and travels at a speed of 5 to 10 mph on its own.
1196	PRIUS	2005	4/24/2007	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated and hit an embankment. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1197	CAMRY	2006	4/24/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that the vehicle accelerated on its own to 30 mph in less than two feet and hit a brick beam. A Field Technical Specialist (FTS) inspected the vehicle.
1198	CAMRY	2007	4/24/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that while on the freeway, the vehicle accelerated forward when customer did not press on the gas pedal. Customer further claims that the engine was still revving up even when he got off the freeway. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1199	CAMRY	2007	4/25/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] she has experienced problems with the vehicle hesitating. Customer further claims that when taking off from a stop the vehicle will hesitate before taking off. Customer alleges that when reversing the vehicle will jump.
1200	CAMRY SOLARA	2006	4/26/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the engine did not rev above 2000 RPM at highway speed. Customer further claims that the gas pedal stuck and did not come back.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1201	CAMRY SOLARA	2007	4/26/2007	Customer called regarding her 2007 Camry Solara SE (V6). Specifically, customer claims that on April 25, 2007, the vehicle was in park when it lunged forward going through her garage, through 2 walls, the entire house and through a chain link fence. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1202	TACOMA	2007	4/26/2007	Customer called regarding his 2007 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on April 26, 2007 the vehicle accelerated on its own and would not stop. Customer further claims that he had to put the vehicle in park to stop it and that the engine continued to race. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1203	TACOMA	2007	4/30/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's RPM rose to 6000 upon starting up.
1204	TACOMA	2007	5/1/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle idled at 1500 RPM when going 10 to 15 mph, and idled at 600 RPM when going under 10 mph.
1205	TACOMA	2007	5/1/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle raced up to 5000 to 6000 RPM. Customer further claims that he has experienced difficulty getting the vehicle to start.
1206	GS 300	2006	5/2/2007	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date, her vehicle unexpectedly accelerated. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1207	ES350	2007	5/2/2007	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, his vehicle accelerated on its own. Customer claims that that the vehicle accelerated and it started racing 18-19 mph and he had his foot on the brakes and he slammed his foot on the brakes so that the vehicle would stop. Customer claims that a similar incident occurred before this one.
1208	AVALON	2005	5/2/2007	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on May 2, 2007, while turning left, his vehicle accelerated, nearly hitting a truck in front of him. Customer claims that his foot was off the accelerator.
1209	CAMRY	2005	5/2/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle lunges forward at a stop.
1210	CAMRY	2007	5/3/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] he has experienced problems with the vehicle hesitating and surging.
1211	GS 300	2006	5/3/2007	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on unknown dates, his vehicle has surged while he attempts to stop from around 20 mph. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1212	RAV 4	2007	5/5/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date while his wife was driving the vehicle at 30 mph, the accelerator pedal got stuck.
1213	SEQUOIA	2004	5/7/2007	Customer called about his/her 2004 Toyota Sequoia 4 WD. Specifically, customer claims that on an unknown date, the car is high sitting at a stop light.
1214	CAMRY	2007	5/7/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has quality concerns about his vehicle. It is unclear whether this complaint involves unintended acceleration.
1215	CAMRY	2007	5/9/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] while backing up her vehicle, it will hesitate and then lurch forward. Customer further claims that the problem occurs when the vehicle is traveling at a rate of speed below 45 mph.
1216	CAMRY	2007	5/9/2007	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that [on unknown dates] his car usually hesitates for 3 to 5 seconds before jolting.
1217	CAMRY	2002	5/10/2007	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated, causing him to hit another vehicle from behind. Customer further claims that at the time of the accident he had his foot on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1218	4RUNNER	2007	5/10/2007	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates when the vehicle idled, the RPMs rose from 500 to 700 at a stop. Customer further claims that when this happened, the vehicle moved on its own. Customer claims that the sudden acceleration occurred when the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1219	COROLLA	2005	5/15/2007	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle surged forward.
1220	CAMRY	2007	5/15/2007	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that [on unknown dates] her vehicle lurches ahead when slowing down.
1221	TACOMA	2005	5/15/2007	Customer called regarding 2005 Toyota Tacoma Prerunner L/B. Specifically, customer claims that the vehicle makes a knocking noise, and pulls and shifts roughly. Customer further claims that the transmission attempts to downshift constantly.
1222	GX 470	2006	5/17/2007	Customer called regarding his 2006 Lexus GX 470. Specifically, customer claims that on unknown dates, his vehicle accelerates on its own. A FTS inspected the vehicle.
1223	TACOMA	2007	5/17/2007	Customer called regarding his 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle's accelerator got stuck. Customer further claims that he pressed the brakes and the wheels were spinning.
1224	IS250	2006	5/18/2007	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle's RPM jumped from 1000 to 3000 while her foot was not on the gas. Customer further claims that the vehicle shifted very hard, and did not drive smoothly.
1225	AVALON	2006	5/18/2007	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, his vehicle accelerated. Customer further claims that he is experiencing a hesitation in his vehicle. Customer claims that the sudden acceleration occurred while the vehicle was stopped and was already in motion.
1226	ES 330	2004	5/18/2007	Customer called regarding his 2004 Lexus ES 330. Specifically, customer claims that on unknown dates, he experienced acceleration problems with the vehicle.
1227	HIGHLANDER	2006	5/21/2007	Customer called regarding his 2006 Toyota Highlander Limited (V6). Specifically, Customer claims that on unknown dates, he experienced intermittent engine surges while stopping. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1228	CAMRY	2005	5/23/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle surged while driving vehicle on a test drive at the dealership. Customer further claims that she was assured by Rami Hinawi (sales agent) that the ride would adjust itself as the car is broken into. Customer further claims that this problem never stopped. Customer claims that it occurs while she is slowing down and accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1229	GX 470	2004	5/24/2007	Customer called regarding his 2004 Lexus GX 470. Specifically, Customer claims that on May 23, 2007, his wife was driving the vehicle at 20 mph with her foot on the brake when the vehicle suddenly accelerated and hit another vehicle, pushing it 20 feet. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1230	4RUNNER	2004	5/30/2007	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle accelerated by itself in reverse when the vehicle was first started. Customer further claims that this problem has occurred five (5) times since he purchased the vehicle.
1231	CAMRY	2004	5/30/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that, on May 27, 2007, the vehicle's gas pedal stuck causing vehicle to surge forward and hit a post and two vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1232	MATRIX	2007	5/31/2007	Customer called about his/her 2007 Toyota Corolla Matrix XR. Specifically, customer claims that on an unknown date, the car accelerates high and jumps at times.
1233	CAMRY SOLARA	2007	5/31/2007	Customer called regarding his 2007 Camry Solara SLE (V6). Specifically, customer claims that on an unknown date when accelerating there was a hesitation in engine then it would take off after stomping on the gas. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1234	CAMRY	2007	5/31/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] the vehicle will often lurch and that the RPM's go up to 4 1/2. Customer further claims that the vehicle will sometimes hesitate before accelerating.
1235	RX 350	2007	5/31/2007	Lawyer called on behalf of customer regarding his 2007 Lexus RX 350. Specifically, customer claims that on an unknown date in May of 2007, his vehicle accelerated unexpectedly, causing an accident in a parking lot.
1236	CAMRY	2005	5/31/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on May 30, 2007 while she was parking the vehicle and pulling into a space, the vehicle surged and went over a cement barrier and hit a fence and a truck with two passengers and hit the rear driver's side of truck but that no one was hurt. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1237	PRIUS	2007	5/31/2007	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date, during test drive at the dealer after purchase, the car was changing gears over and over again. Customer further claims vehicle was surging between engine and electric motor. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1238	CAMRY	2007	6/1/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] the vehicle hesitates when accelerating. Customer further claims that when she gives the accelerator pedal more pressure the vehicle jerks.
1239	CAMRY	2007	6/1/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that vehicle accelerates too fast.
1240	CAMRY	2007	6/1/2007	Customer called regarding his 2007 Toyota Camry SE. Specifically customer claims that [on unknown dates] the vehicles cruise control system does not work properly. Customer further claims that when driving uphill the vehicle will not maintain its speed, and that when she presses the gas pedal there is a delay before the vehicle will accelerate. Customer alleges that when driving on the highway the vehicle will lunge back and forth when she tries to maintain her speed. Customer further alleges that the vehicle often hesitates for three to five seconds before jolting.
1241	CAMRY	2007	6/2/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle hesitates before accelerating. Customer further claims that the vehicle jumps when taking off from a stopped position.
1242	Tundra	2007	6/4/2007	Customer complains of a bump in the drivetrain when accelerating from a stop. Customer claims the bump occurs as the vehicle begins to move. The condition was verified. It was observed that the vehicle had to be stopped aggressively from speeds of 35 mph or higher. The bump sensation was similar to that present in the 00-06 Tundra but that the bump was different because it occurred when the vehicle started to move as opposed to when the engine dropped. The rear propeller shaft assembly was replaced with one from another comparable vehicle and the condition was corrected.
1243	CAMRY	2006	6/4/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on June 1, 2007, her vehicle was stopped in the car wash in reverse gear when it suddenly surged in reverse. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1244	4RUNNER	2004	6/4/2007	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates his gas pedal has stuck twice in one month.
1245	CAMRY	2007	6/4/2007	Customer called regarding his 2007 Toyota Camry CE. Specifically, customer claims that on unknown dates his gas pedal lunged.
1246	CAMRY	2007	6/4/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that in late May 2007 his vehicle suddenly accelerated when he was backing out of his garage, causing him to run into a tree. Customer further claims that the gas pedal felt like it was stuck. Customer further claims that the vehicle suddenly accelerated when his daughter put the vehicle back in the garage.
1247	CAMRY	2007	6/4/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he presses on the gas pedal, the vehicle loses power and the picks up power.
1248	RAV 4	2006	6/5/2007	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1249	CAMRY SOLARA	2007	6/6/2007	Customer called regarding her 2007 Toyota Camry Solara SE. Specifically, customer claims that on unknown dates when she pressed the gas pedal and the vehicle did not always accelerate, and that when the acceleration did kick in, it revved up to about 400 RPM's and then the vehicle propelled forward very quickly. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1250	SC 300	1999	6/6/2007	Customer called regarding her 1999 Lexus SC 300. Specifically, customer claims that on unknown dates, her vehicle surges intermittently. On one such occasion, the vehicle surged into a barrier while turning into a driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1251	ES 350	2007	6/7/2007	Customer claims that when he drives from 35-40 mph and lightly accelerates, the vehicle takes off as if it was floored. Vehicle was test driven and problem was duplicated in 5/4 downshift. After TSB was performed there was a noticeable difference in shifting. TSB TC005-07 was performed.
1252	GS 300	2001	6/8/2007	Customer called regarding her 2001 Lexus GS 300. Specifically, Customer claims that on three unknown dates, after driving on the highway for several hours, the vehicle's accelerator stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
1253	TACOMA	2005	6/8/2007	Customer called regarding his 2005 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on unknown dates the vehicle accelerated when coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1254	HIGHLANDER	2005	6/11/2007	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on May 1, 2007, her vehicle was racing and she had to shut it down.
1255	CAMRY	2006	6/11/2007	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he was in a parking lot when the vehicle was going backwards, and he may have accidentally stepped on the gas instead of the brake and the vehicle went forward.
1256	CAMRY SOLARA	2007	6/12/2007	Customer called regarding her 2007 Camry SE. Specifically, customer claims that when driving the vehicle and she stops or at a rolling stop states presses gas pedal and the vehicle does not always accelerate. States when the acceleration does kick in, it revs up to about 400 RPMs and then the vehicle propels forward very quickly. Customer further claims that she took her vehicle to the dealer, and dealer test drove vehicle on 6/5/07 and noticed when pressing on the accelerator vehicle hesitates and then takes off at high speed. The Field Technical Specialist (FTS) spoke to the dealer about the vehicle. Customer claims that the sudden acceleration occurs while the vehicle is at a full stop and when it is already in motion.
1257	CAMRY	2007	6/13/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle jumps, stalls and without placing her foot on the accelerator pedal the vehicle accelerates.
1258	CAMRY	2007	6/13/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle will delay for a few seconds before revving up. Customer further claims that the vehicle revs more often when the engine is cold.
1259	CAMRY	2007	6/13/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] her vehicle stalls when it accelerates and jerks when she steps on the gas from a full stop.
1260	CAMRY	2007	6/13/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that there is an issue with the acceleration in her vehicle. The particulars of the underlying incident(s) are unclear.
1261	HIGHLANDER	2007	6/14/2007	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claims that on an unknown date, he was backing up the car and the vehicle surged. Customer further claims that the vehicle will surge if he is not braking really hard.
1262	COROLLA	2006	6/14/2007	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle began to accelerate. Customer further claims that he shifted gears and used the brakes to prevent the vehicle from going into oncoming traffic.
1263	TUNDRA	2007	6/14/2007	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle shakes and vibrates when he is driving. Customer further claims that when he starts the vehicle in the morning, the RPM is very high and stays high. Customer states that the vibration is getting worse over time.
1264	TACOMA	2005	6/15/2007	Customer called regarding his 2005 Toyota Tacoma PreRunner. Specifically, customer claims that on April 20, 2007 the vehicle would not stop or decelerate after he had deliberately slammed the accelerator. Customer further claims that he slammed into another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1265	AVALON	2007	6/18/2007	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on June 17, 2007, while putting the vehicle in reverse, his vehicle accelerated quickly and backed into a tree, causing damage to the trunk of the vehicle. Customer further claims that he tried to apply brakes when his foot slipped off brake pedal. Customer claims that a similar occurrence happened twice before. An Field Technical Specialist inspected the vehicle and found that it was operating correctly and as designed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1266	CAMRY	2007	6/18/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that vehicle maked a loud noise when going up a hill and then started accelerating. Customer further claims that the brake froze, the emergency brake didn't work, and that he had to throw the vehicle into park to stop the vehicle. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1267	CAMRY	2007	6/19/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] her vehicle surged to between 20-40 mph.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1268	ES350	2007	6/19/2007	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, the vehicle's odometer was over revving in 3-4 gear when vehicle is decelerating and he begins to reaccelerates.
1269	TACOMA	2007	6/22/2007	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle RPM does not drop quickly when shifting gears. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
1270	CAMRY	2007	6/25/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] he felt the vehicle hesitate when he applied pressure to the pedal. Customer further claims that when he stops with his foot on the brake pedal it feels like someone bumps him from behind.
1271	RX 330	2006	6/25/2007	Customer called regarding her 2006 Lexus RX 330. Specifically, customer claims that on unknown dates, her vehicle surged forward when removing her foot from the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1272	CAMRY	2007	6/25/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle hesitated and surged during shifting.
1273	CAMRY	2007	6/26/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] he feels his vehicle hesitate and then surge.
1274	AVALON	2005	6/27/2007	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle revved up on the highway, and the vehicle stopped, then went up to 77 mph. Customer further claims that when he restarted the vehicle the engine immediately revved high. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
1275	CAMRY	2007	6/27/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he is having trouble accelerating in the vehicle, and that the vehicle hesitates when the vehicle turns corners and accelerates.
1276	CAMRY	2007	6/27/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle would go into drive mode when she selected reverse mode.
1277	CAMRY	2007	6/27/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle has an idle speed of 1200 rpms. Customer further claims that the vehicle pulls to the right side.
1278	CAMRY	2005	6/27/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle was in park, the customer put vehicle in drive and the vehicle took off on it's own and ran into a parked vehicle. Customer claims that, this incident occurred again recently. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1279	PRIUS	2005	6/27/2007	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates when she stepped on the gas the vehicle jerked forward and felt like the parking brake was on.
1280	TACOMA	2007	6/27/2007	Customer called regarding 2007 Toyota Tacoma Prerunner L/B. Specifically, customer claims that vehicle has surged three times when he was driving the vehicle, but that the problem may be due to driver error. Customer further claims that he was in an accident on June 27, 2007 in which he was at a complete stop and the vehicle lunged forward. Although customer allegedly hit the brakes to stop the vehicle, the vehicle allegedly collided with another vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
1281	CAMRY	2007	6/28/2007	Customer called regarding her 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle revs up high and in the reverse mode the vehicle shoots out. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1282	CAMRY	2007	6/28/2007	Customer's boyfriend called regarding her 2007 Toyota Camry LE. Specifically, her boyfriend claims that on an unknown date vehicle idled high when the air conditioner is on and vehicle hesitates on acceleration. Customer's boyfriend further claims the vehicle hesitated in accelerating. Customer's boyfriend further claim that brake warning light is on and brake fluid is leaking.
1283	CAMRY	2007	6/29/2007	Customer's attorney called regarding her 2007 Toyota Camry XLE. Specifically, her attorney claims that on an unknown date the brake system malfunctioned. Customer's attorney further claims that the vehicle surged and accelerated. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1284	CAMRY	2007	6/30/2007	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the dealer pressured her during the purchase of her vehicle. Customer further states that the vehicle hesitated and surged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1285	AVALON	2007	7/2/2007	Customer called regarding his 2007 Toyota Avalon Limited. Specifically, customer claims that on unknown dates when he slowed down to approximately 20 mph, the RPM climbed to 1,200 RPM and the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1286	TUNDRA	2006	7/2/2007	Customer called regarding his 2006 Toyota Tundra 4x4. Specifically, customer claims that on June 2, 2007, while his wife was driving, the vehicle took off as she was parking. The brakes did not work, either. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1287	SIENNA	2006	7/2/2007	Customer called regarding a 2006 Toyota Sienna. Specifically, customer claims that, on unknown dates, the vehicle hesitates when the gas pedal is pushed. The customer further claims that the hesitation occurs while the vehicle is already in motion.
1288	CAMRY	2002	7/5/2007	Customer called regarding her 2002 Toyota Camry LE. Specifically, Customer claims that on an unknown date the vehicle's gas pedal went to the floor and took off at full throttle even though the driver was stepping on the brakes, causing the car to hit a tree.
1289	CAMRY	2007	7/5/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he has issues with vehicle acceleration, stalling, and the radio not working. Customer further claims that the vehicle does not shift properly.
1290	RAV 4	2007	7/5/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle jerked all the way up a hill, while in cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1291	GS 400	2000	7/5/2007	Customer called regarding her 2000 Lexus GS 400. Specifically, customer claims that on unknown dates, his vehicle idles higher than ever before at idle speeds. Customer further claims that speed does not decrease when he lifts his foot off the accelerator.
1292	AVALON	2007	7/5/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date he experienced surging and an increase in speed. Customer further claims that on an unknown date he started his vehicle and the engine accelerated to 1900 RPM without any pressure on the accelerator and then idled to 1000 RPM, then to 900 RPM.
1293	CAMRY	2007	7/9/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1294	CAMRY	2003	7/9/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on June 19, 2007, she was pulling into a hotel and pushed the gas pedal slightly and the pedal stuck and she lost control of the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1295	CAMRY	2006	7/9/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates there was a surge when her foot was on the brake at a stop. Customer further claims that the vehicle would surge when the vehicle was traveling 38-40 mph. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
1296	MATRIX	2005	7/9/2007	Customer called on behalf of her mother regarding a 2005 Toyota Corolla Matrix XR. Customer claims that July 4, 2007 the vehicle's gas pedal stuck causing the car to accelerate and jump the curb. Customer further claims that the vehicle struck the fence to his home when the emergency brake failed to stop the acceleration. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1297	CAMRY	2007	7/10/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the car jolted and accelerated. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1298	CAMRY	2007	7/11/2007	Customer called regarding his 2007 Toyota LE. Specifically, customer claims that on an unknown date the vehicle hesitated during acceleration. Customer further claims that when the vehicle stopped, it made a loud bang & jolt in the front of the vehicle. Customer further claims that the sudden acceleration occurred when the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1299	CAMRY	2003	7/11/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on an unknown date, while she was stopped at a light, she lifted her foot off the brake and the vehicle accelerated. Customer further claims that she then pushed on the brake, but it did not work and she struck another vehicle. Customer further claims that this same acceleration happened twice previously with the vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was at a full stop.
1300	CAMRY	2007	7/11/2007	Customer called regarding his 2007 Toyota Camry hybrid. Customer claims that the vehicle does not decelerate when not pressing on the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1301	CAMRY	2004	7/12/2007	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle speeds up and does not brake. Customer further claims that the vehicle got into an accident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1302	RAV 4	2007	7/18/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle surged, even though his foot was on the brake. Customer further claims that he had to put the car in neutral to stop the surges. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1303	CAMRY	2007	7/19/2007	Customer called regarding his 2007 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date the vehicle surged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1304	TACOMA	2005	7/19/2007	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle's radio made a rumbling sound. Customer further claims that on unknown dates the vehicle vibrated when driving at 20-30 mph.
1305	CAMRY	2007	7/19/2007	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that on July 17, 2007, the vehicle surged forward, RPMs revved up and hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1306	CAMRY	2007	7/19/2007	Customer called regarding his 2007 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date his wife pulled into a parking space and the vehicle lunged forward and she hit another vehicle. The customer also claims that the gears slip in and out of neutral. The Field Technical Specialist (FTS) has been involved. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1307	CAMRY	2007	7/19/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the vehicle has a very touchy gas pedal and that the gas pedal is too sensitive.
1308	FJ CRUISER	2007	7/19/2007	Customer called about her 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on several unknown dates, the car lunged forward when stopped. Customer claims the sudden acceleration happened while the vehicle was already at a full stop.
1309	CAMRY	2007	7/20/2007	Customer called regarding his 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle engine experiences high idle. Customer further claims that he has difficulty controlling the vehicle when rpm is too high. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
1310	CAMRY	2007	7/20/2007	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she has a problem with acceleration. The particulars of the underlying incident are unclear.
1311	COROLLA	2007	7/24/2007	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's idle raced up to 5000 RPM at start up and that the vehicle surged and accelerated on its own. A Field Technical Specialist (FTS) inspected the vehicle.
1312	HIGHLANDER	2008	7/24/2007	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated going down a hill. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1313	CAMRY	2005	7/24/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle was on the 5th floor of a parking structure. Customer further claims that he was 2/3 into the parking space going 5-7 mph when the vehicle suddenly accelerated and hit a pole that was in front of the parking space. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1314	IS350	2006	7/25/2007	Customer called regarding his 2006 Lexus IS 350. Customer claims that on an unknown date, he was parking the vehicle and the vehicle lurched forward as he applied the brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1315	CAMRY	2007	7/26/2007	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle changed from one gear to another and jerked forward. The customer further claims that she can hear a noise when the transmission shifts gears. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1316	CAMRY	2007	7/27/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues.
1317	PRIUS	2007	7/27/2007	Customer called regarding his 2007 Toyota Prius Touring Hybrid. Specifically, customer claims that on unknown dates, the vehicle had poor gas mileage, and customer heard clicking/buzzing sound and irregular engine/electric transition (vehicle surges forward). An FTS inspected the vehicle.
1318	CAMRY	2007	7/31/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date, while the vehicle went uphill, the RPMs increased and the vehicle tried to down shift to accelerate. Customer further claims that the vehicle hesitated and surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1319	CAMRY	2007	8/2/2007	Customer call regarding his 2007 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle lurched when he pressed on the accelerator. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1320	CAMRY	2007	8/3/2007	Customer called regarding his 2007 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle hesitated and then jerked forward and took off. Customer also claims that the vehicle hesitated on an incline. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1321	AVALON	2006	8/3/2007	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, he was involved in an accident. While the vehicle was being repaired, he called to complain that he does not feel the vehicle is safe.
1322	4RUNNER	2006	8/3/2007	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that he has experienced acceleration concerns. Customer states that he no longer wants the vehicle because of the problem.
1323	MATRIX	2007	8/3/2007	Customer called about his 2007 Toyota Corolla Matrix XR. Specifically, customer claims that on July 29, 2007, the car's accelerator stuck while in reverse. Customer claims this happened while the vehicle was already in motion.
1324	CAMRY	2005	8/3/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that, on unknown dates, the vehicle is surging forward and the engine is revving high. The customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1325	CAMRY	2003	8/6/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on an unknown date, the vehicle surged forward and went over a parking block.
1326	AVALON	2007	8/7/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on August 7, 2007, he was driving on the highway and stopped on the accelerator to pass other vehicles and the vehicle surged out of control. Customer further claims that he tried to stop on the accelerator again to reduce the speed and the vehicle continued to surge in the red line area on the odometer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1327	CAMRY	2003	8/7/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on three unknown dates, her vehicle lunged forward.
1328	4RUNNER	2007	8/8/2007	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates she experienced a vibration or rumble in the steering wheel. Customer further claims that the vehicle surged and lunged forward when the brakes were applied and when the vehicle was idle. Customer claims that this problem happened intermittently.
1329	CAMRY	2005	8/8/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on November 27, 2007 the vehicle suddenly unintentionally accelerated while in reverse. The customer further claims the brake was depressed at the time of the acceleration and that a minor accident occurred as a result. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1330	RAV 4	2006	8/9/2007	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1331	AVALON	2006	8/9/2007	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while he was driving in a 35 mph zone, the vehicle accelerated to the red zone of the odometer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1332	TACOMA	2007	8/13/2007	Insurance agent called regarding customer's 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged and the RPM revved when the brake was depressed. Customer further claims that on an unknown date the vehicle hydroplaned when he was driving less than 70 mph on the interstate.
1333	CAMRY	2005	8/13/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on August 14, 2007 the vehicle suddenly unintentionally accelerated which caused an accident. The customer further claims the brake was depressed at the time of the acceleration. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was already in motion.
1334	AVALON	2006	8/15/2007	Customer claims that that on an unknown date her 2006 Toyota Avalon Limited unintentionally accelerated. Customer claims that while driving 35 mph, the vehicle accelerated to the red zone. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1335	ES350	2007	8/16/2007	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, the customer was having concerns regarding acceleration and gears shifting in the vehicle.
1336	ES350	2007	8/16/2007	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, while her son was driving, the vehicle accelerated.
1337	ES 330	2005	8/18/2007	Customer called regarding his 2005 Lexus ES 330. Specifically, Customer claims that on two unknown dates, his vehicle accelerated on its own. Customer further claims that the first time, the vehicle was idling in park and began to creep towards him. Customer claims the second time, the vehicle accelerated and went through a fence and he stopped it by putting on the parking brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1338	SIENNA	2004	8/20/2007	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on August 18, 2007, he was entering a highway the vehicle accelerated and would not slow down even as he applied the brakes. Customer further claims that he has experienced other problems with the vehicle hesitating and then lurching forward upon acceleration.
1339	AVALON	2007	8/20/2007	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on unknown dates, the vehicle's RPMs go higher causing the vehicle to creep forward when not holding the brake pedal. Customer further claims that the vehicle idles around 700rpm.
1340	CAMRY	2005	8/20/2007	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on unknown dates, the vehicle has accelerator issues that she fails to define. A Field Technical Specialist (FTS) did not inspect the vehicle. The customer further claims the accelerator issues occur while the vehicle is already in motion.
1341	TACOMA	2006	8/20/2007	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle will go from 2000 RPM to 5000 RPM upon acceleration when the vehicle is on cruise control or overdrive. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1342	SIENNA	2005	8/21/2007	Customer called regarding his 2005 Toyota Sienna. Specifically, the customer claims that on August 21, 2007, the vehicle surged while his wife's foot was on the brake. Customer further claims that the vehicle hit a curb and caused minor property damage. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1343	LS 430	2001	8/21/2007	Customer called regarding her 2001 Lexus LS 430. Specifically, customer claims that on an unknown date, her husband was backing the vehicle out of a parking space when they heard the engine roar, he put the vehicle into park, but the vehicle accelerated, hitting a pole.
1344	SIENNA	2005	8/21/2007	Customer called regarding his 2005 Toyota Sienna. Specifically, the customer claims that on August 21, 2007, the vehicle surged while his wife's foot was on the brake. Customer further claims that the vehicle hit a curb and caused minor property damage. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1345	SIENNA	2005	8/22/2007	Customer called regarding his 2005 Toyota Sienna. Specifically, the customer claims that on an unknown date the vehicle surged while his foot was on the brake. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1346	TACOMA	2005	8/22/2007	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle surged forward and revved up to approximately 3500 RPM upon starting up. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1347	SIENNA	2005	8/22/2007	Customer called regarding his 2005 Toyota Sienna. Specifically, the customer claims that on August 21, 2007, the vehicle surged while his wife's foot was on the brake. Customer further claims that the vehicle hit a curb and caused minor property damage. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1348	PRIUS	2006	8/24/2007	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on August 24, 2007, she was pulling into her garage at 2 mph when the engine revved loudly and the vehicle accelerated into the wall in front of her garage. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1349	CAMRY	2007	8/24/2007	Customer called regarding his 2007 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle hesitated when gas pedal was depressed and then jerked. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1350	LX 470	2006	8/27/2007	Customer called regarding her 2006 Lexus LX 470. Customer claimed that on August 10, 2007, while attempting to reverse slowly into a parking space, the vehicle accelerated and crashed into a building. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1351	RAV 4	2007	8/27/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle experienced acceleration issues. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1352	CAMRY	2005	8/29/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims to be concerned about the accelerator, but fails to provide any further information. A Field Technical Specialist (FTS) did not inspect the vehicle.
1353	Tundra	2007	9/4/2007	An FTR from the U.S., issued September 4, 2007, concerning a 2007 Toyota Tundra, states that the customer complained that the gas pedal does not release smoothly. The TPS on line graph was inspected and codes were checked. Inconsistent pedal effort when pressing down was confirmed. The probable cause was determined to be dirt contamination. The accelerator pedal assembly was replaced.
1354	CAMRY	2007	9/4/2007	Customer called regarding his 2007 Toyota Camry LE. The customer claims on an unknown date that the vehicle engine surged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1355	CAMRY	2007	9/4/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle hesitates when it accelerates and that the cruise control does not hold the vehicle's speed, which makes it accelerate dramatically to speed up. Customer further claims that the vehicle gets poor gas mileage. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1356	CAMRY	2007	9/5/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle hesitated and then accelerated. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1357	CAMRY	2005	9/5/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on September 5, 2007 the vehicle suddenly unintentionally accelerated. The customer further claims the brake was depressed at the time of the acceleration and that an accident occurred as a result. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was already in motion.
1358	CAMRY	2004	9/7/2007	Customer called regarding her 2004 Toyota Camry LE. Specifically, customer claims that on an Septemeber 6, 2007, her vehicle suddenly accelerated when her gas pedal stuck, causing her to hit a cement block and a chain link fence. Customer further claims that at the time of the accident she had her foot on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
1359	CAMRY	2007	9/7/2007	Customer called regarding her 2007 Toyota 2007 XLE. Specifically, customer claims that on various unknown dates the transmission surges. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1360	CAMRY	2002	9/7/2007	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle accelerated to 50 mph after her gas pedal broke when she put her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1361	CAMRY	2003	9/10/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on June 19, 2007, while her niece was driving the vehicle, customer's niece tapped the accelerator to pull further into a parking stall and the vehicle ran into a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1362	PRIUS	2007	9/10/2007	Customer called in regarding a 2007 Toyota Prius Touring. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and the engine revved on 9/10/2007. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
1363	IS250	2007	9/10/2007	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on unknown dates the vehicle's engine surged when he drove slowly in warm weather. Customer further claims that the vehicle steered to the left when braking and that the parking brake did not hold well.
1364	IS 300	2004	9/11/2007	Customer called regarding her 2004 Lexus IS 300. Specifically, customer claims that on an unknown date, her vehicle took off as she was exiting a driveway, causing her to hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1365	TACOMA	2007	9/11/2007	Customer called regarding his 2007 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on unknown dates the vehicle idled at 900 rpm with or without the air conditioner on. Customer further claims that the vehicle seemed to fight the brakes because of the idling rpm, and that the vehicle pulled forward when he took his foot off of the brakes.
1366	Highlander	2008	9/12/2007	Customer claims that depressing the brake pedal only a few mm causes the Brake Assist system to activate. Customer further claims this causes the vehicle to lurch to a stop with little pedal travel, making the vehicle undrivable. The brake pedal load sensing switch was visually inspected. It was observed that the switch plunger did not align with the actuator brake. It was further observed that the switch plunger jammed against the bracket. The bracket appeared to be bending or shifting with extreme braking maneuvers. The bracket was repositioned into place and the code immediately changed to stored. After the bracket was repositioned the brake moved out of place upon another panic maneuver stop being performed.
1367	CAMRY	2006	9/13/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on September 5, 2007, she was going 2-3 mph in her driveway with her foot on the brake when the engine revved and the vehicle accelerated, causing her to hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1368	CAMRY	2006	9/14/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated when her foot was on the brake.
1369	RX 330	2004	9/17/2007	Customer called regarding his 2004 Lexus RX 330. Specifically, Customer claims that on unknown dates while his wife was driving the vehicle, the accelerator got stuck and she could not stop the vehicle.
1370	CAMRY	2007	9/17/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues when trying to accelerate from a full stop.
1371	CAMRY	2007	9/17/2007	Customer called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle hesitated then lunged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1372	SCION TC	2006	9/18/2007	Customer called regarding his 2006 Scion TC. Specifically, Customer claims that on unknown dates he noticed the vehicle was accelerating a lot.
1373	ES350	2007	9/19/2007	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle had a jackrabbit start at times and that the vehicle had a dead zone when he applied the accelerator.

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1	Model	Model Year	Report or claim date	Summary
1374	CAMRY	2005	9/19/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on September 14, 2007 the vehicle surged and caused a minor accident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred when the vehicle was already in motion.
1375	CAMRY	2006	9/19/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated while her foot was on the brake.
1376	SIENNA	2006	9/24/2007	Customer called regarding his 2006 Toyota Sienna. Specifically, the customer claims to have concerns regarding the acceleration. No further information is provided.
1377	ES350	2007	9/24/2007	Customer called regarding her 2007 Lexus ES 350. Customer claims that on an unknown date, she was pulling into a driveway when the vehicle surged, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1378	PRIUS	2007	9/26/2007	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on September 25, 2007, when vehicle was running only on battery, and while pulling into parking spot, the vehicle surged and jumped over parking pylon, and hit a tree. Customer states her foot slipped off the brake and could have hit the accelerator. Customer further claims that she was unable to apply the brakes. Customer further claims this has happened 3 times. The FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1379	PRIUS	2003	9/28/2007	Customer called regarding her 2003 Toyota Prius. Specifically, Customer claims on an unknown date, she was at a stop when she released her foot from the brake and the vehicle lunged forward. Customer further claims that she applied the brakes but the vehicle continued to accelerate forward causing her to hit another car. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1380	CAMRY	2006	9/28/2007	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that in September 2007 his wife was pulling into a parking space with her foot on the brake when the vehicle suddenly accelerated, jumped the curb and went through a glass storefront.
1381	CAMRY	2008	9/28/2007	Customer call regarding his 2008 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date the vehicle jerked forward. Customer further claims that the steering wheel vibrated and vehicle lunged forward. Customer further claims that on October 11, 2007, the vehicle shifted irregularly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1382	CAMRY	2007	10/1/2007	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on September 30, 2009, she was unable to control her steering or brakes and hit another vehicle as a result. Customer further claims that her vehicle accelerated suddenly. Customer states that she was unable to apply the brakes and had to turn off the ignition to make the vehicle stop. Customer states that her speed was approximately 30 miles per hour before impact. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1383	IS250	2006	10/2/2007	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on unknown date, the vehicle lunged forward and he ran into another vehicle while his foot was on the break.
1384	COROLLA	2007	10/5/2007	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on September 30, 2007, the vehicle suddenly accelerated into another vehicle while she was parking with her foot on the brake. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1385	4RUNNER	2007	10/5/2007	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on September 28, 2007, her vehicle rear-ended another vehicle as a result of unintended acceleration.
1386	TACOMA	2006	10/5/2007	Customer called regarding his 2006 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on an unknown date the vehicle accelerated on its own.
1387	COROLLA	2005	10/6/2007	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle lurched forward.
1388	CAMRY	2007	10/6/2007	Customer called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle accelerated and hit a wall. Customer further claims that the tires would not stop spinning until he put the vehicle in park and turned off the engine. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1389	TUNDRA	2007	10/8/2007	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that when he attempts to accelerate, the engine revs up. Customer further claims that the event has happened twice.
1390	AVALON	2006	10/8/2007	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on October 8, 2007 the vehicle accelerated by itself when she was pulling into a parking spot, causing the vehicle to jump the curb and hit some bushes. Customer further claims that her foot was on the brakes and the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1391	AVALON	2007	10/9/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date in 2007 he was driving on the freeway and pushed the gas pedal to change lanes and the pedal went straight to the floor, and the vehicle began accelerating. Customer further claims that hitting the brakes did not stop the vehicle. Customer put the transmission in neutral but it revved so high that customer got scared and put it back into drive. Customer tried to turn the vehicle off with the push button but was not able to shut it off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1392	CAMRY	2007	10/9/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on August 9, 2008, he was driving into a parking space in a garage with his foot on the brake. Customer further claims that the vehicle suddenly accelerated, hitting a wall and damaging the bumper and fender. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1393	CAMRY	2007	10/9/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle has accelerated on its own. The particulars of the underlying incident are unclear.
1394	CAMRY	2007	10/9/2007	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle down shifted and surged forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1395	ES 330	2004	10/10/2007	Customer called regarding his 2004 Lexus ES 330. Specifically, Customer claims that on an unknown date while his wife was driving the car, the accelerator pedal locked and the car reached a high speed, she couldn't stop the car, lost control and crashed into other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1396	CAMRY	2003	10/11/2007	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on October 5, 2007 are vehicle suddenly accelerated as she departed a car wash and placed the vehicle into drive. Customer further claims that the vehicle did not stop when the brakes were applied and eventually her car crashed into a brick wall and became airborne. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
1397	TACOMA	2007	10/12/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged when operating the air conditioner or defroster.
1398	CAMRY	2007	10/12/2007	Customer called regarding his 2007 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date the vehicle surged in acceleration between 20-40 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1399	CAMRY	2007	10/12/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that when driving approximately 55 miles per hour, the RPM jumps up to 5,500 and then drops down to 3,000 and then drops to 2,100. Customer feels that this issue is affecting fuel economy in the vehicle.
1400	LS 430	2001	10/12/2007	Customer called regarding her 2001 Lexus LS 430. Specifically, customer claims that on an unknown date, her vehicle was in drive and jolted forward, causing her to crash into a concrete block. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1401	SCION tC	2007	10/13/2007	Customer called regarding her 2007 Scion TC. Specifically, Customer claims that on unknown dates, when she braked, the vehicle jumped forward.
1402	ES 300	2003	10/13/2007	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on an unknown date, she was parking her vehicle when it accelerated without her foot on the gas pedal, causing a crash into the concrete wall of a shopping center.
1403	CAMRY SOLARA	2007	10/15/2007	Customer called regarding her 2007 Toyota Camry SE. Specifically, customer claims that in August 2007 the vehicle accelerated into a tree as she was pulling into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1	Model	Model Year	Report or claim date	Summary
1404	TACOMA	2006	10/15/2007	Customer called regarding his 2006 Toyota Tacoma Prerunner. Customer states that vehicle sometimes surges as if gas pedal is stuck, and that vehicle sometimes continues to move when brake is pressed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1405	AVALON	2007	10/15/2007	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while parking her vehicle, it accelerated suddenly and would not stop until she hit a plant stand in carport. Customer further claims that while at stoplights, the brakes failed to hold and that the motor was lurching and racing.
1406	4RUNNER	2007	10/15/2007	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on September 28, 2007 her vehicle rear-ended another vehicle as a result of unintended acceleration.
1407	4RUNNER	2007	10/15/2007	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that in approximately October 2007 his accelerator pedal became stuck twice in one week. Customer further claims that in one instance while he was driving the pedal got stuck, causing the vehicle to accelerate to 80 miles per hour before the pedal "popped back." Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1408	RAV 4	2007	10/16/2007	Customer called about his 2007 Toyota RAV4. Specifically, customer claims that on unknown dates, the car quickly moved forward and the rpm increased to 3000 when attempting to brake. Customer further claims that at the time on the incident he had his foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1409	CAMRY	2005	10/17/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on an unknown date, the vehicle revved and accelerated down the street. Customer claims that the acceleration occurred while the vehicle was at a complete stop when he attempted to put the vehicle into gear.
1410	ES350	2007	10/17/2007	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that her sister took her vehicle to the dealership after experiencing unintended acceleration.
1411	TACOMA	2006	10/17/2007	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims in 10/2007 that the vehicle does not decelerate when shifting gears. FTS inspected the vehicle and advised that the vehicle is normal. The customer further claims the condition occurs while the vehicle is already in motion.
1412	RAV 4	2007	10/17/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that on 9/8/07 his wife was driving the vehicle, when it accelerated on its own, causing her to hit a fence and bench. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1413	CAMRY	2006	10/18/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated on its own. A Field Technical Specialist (FTS) inspected the vehicle.
1414	CAMRY	2007	10/18/2007	Customer's wife called regarding customer's 2007 Toyota Camry XLE (V6). Specifically, customer claims that on unknown dates the vehicle lunged forward when shifting from 3rd to 4th gear. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1415	PRIUS	2007	10/18/2007	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle sped up quickly and hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1416	HIGHLANDER	2004	10/18/2007	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that when he wants to stop the vehicle, it feels as though he hasn't taken his foot off of the accelerator -- the vehicle brakes but the engine still tries to go.
1417	CAMRY	2007	10/19/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle sometimes fails to accelerate when the gas pedal is depressed, and no amount of pressure will increase the speed. Customer further claims that the vehicle stalls, sputters and chokes, and will shut off. Customer states that the cruise control will shift into passing gear at any moment.
1418	CAMRY	2006	10/20/2007	Customer called about his 2006 Toyota Camry LE. Specifically, customer claims that on several unknown dates, the car's idle was extremely high upon start. Customer further claims that the car lunges quickly when his foot is taken off the brake.
1419	RAV 4	2007	10/22/2007	Customer's representative called regarding her 2007 Toyota RAV4. Specifically, customer's representative claims that on an unknown date the vehicle lurched when the vehicle was cold and in reverse mode. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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1	Model	Model Year	Report or claim date	Summary
1420	AVALON	2006	10/22/2007	Customer called regarding her 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, her vehicle hesitates when she accelerates from a stop. Customer further claims that she has almost been hit while she was merging into traffic. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop and already in motion.
1421	CAMRY	2007	10/23/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims on an unknown date that the vehicle malfunctioned.
1422	TUNDRA	2007	10/23/2007	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle's engine revved too high. Customer further claims that the vehicle jolted when changing gears.
1423	CAMRY	2006	10/23/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on December 6, 2006, her husband was pulling in the driveway and braked, but the vehicle accelerated and went through the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1424	RAV 4	2007	10/23/2007	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date although he pressed the brake, the vehicle surged forward and idled high. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1425	TACOMA	2006	10/24/2007	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims in 10/2007 that the vehicle does not decelerate when shifting gears. FTS inspected the vehicle and advised that the vehicle is normal. The customer further claims the condition occurs while the vehicle is already in motion.
1426	TACOMA	2007	10/25/2007	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims that on 10/22/2007 the vehicle RPM increased and he lost his brakes. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurs when the vehicle is already in motion.
1427	CAMRY	2005	10/26/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on three separate occasions the vehicle accelerated unintentionally and that an accident occurred on each occasion. The most recent claimed event occurred on October 27, 2007. Customer claims that the acceleration occurs when the vehicle is at a complete stop when he attempts to put the vehicle into gear.
1428	TACOMA	2005	10/26/2007	Customer called regarding his 2005 Toyota Tacoma V6. Specifically, customer claims that on an unknown date, when fully depressed, his brake pedal touches the accelerator and causes it to surge.
1429	PRIUS	2007	10/26/2007	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while driving on the highway at 60-70 mph, he felt a surge in acceleration. Customer further claims that front rotors and pads were changed at 2300, and at 2700 miles, he was told by dealer that the front rotors and pads have to be changed again. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1430	AVALON	2007	10/26/2007	Customer called regarding her 2007 Toyota Avalon XL. Specifically, customer claims that on October 20, 2007, while driving about 60-65 mph the engine started to go to 85 mph on its own. Customer further claims that she stepped on brakes and the vehicle would not slow and she heard a loud popping noise from under driver's side floor board. She claims that after this the vehicle started to slow and the air conditioning turned off. Customer claims that the brakes functioned properly after the incident. Customer claims that this was not the first incident. The vehicle was inspected by a Field Technical Specialist. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1431	Camry	2007	10/27/2007	Customer claims that the vehicle surges on a steady cruise, and that the vehicle is aggressive while in cruise and going up an incline. Vehicle checked for updates, trans fluid level. Vehicle compared to like vehicle with same engine ECU calibration and vehicle behaved in the same manner.
1432	ES350	2007	10/29/2007	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that while pulling into a parking space, her vehicle surged and the brakes were not responsive. Customer claims that the only thing that stopped the vehicle was the vehicle parked across from her parking spot and the only damage was to the parked vehicle.
1433	AVALON	2007	10/29/2007	Customer claims that on an unknown date, his 2007 Avalon Limited unintentionally accelerated. Specifically, customer claims that while slowing down, the RPM accelerated and he was unable to stop the vehicle. Customer claims that a similar incident has occurred on more than one occasion. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1434	CAMRY	2007	10/29/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle goes into overdrive on its own, and that her vehicle takes off even when she doesn't press the accelerator pedal. Customer further claims that she has almost gotten into two accidents because of the problem.
1435	Tundra	2007	10/30/2007	Customer claims that while sitting in drive stopped the vehicle's RPMs surged up to 1100. The vehicle's engine controls were tested and no codes or abnormal readings were found. No repair.
1436	COROLLA	2006	10/30/2007	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle sped up on its own when going up a mountain.
1437	MATRIX	2008	10/30/2007	Customer called about his 2008 Toyota Corolla Matrix STD. Specifically, customer claims that on October 28, 2007, the car suddenly accelerated causing him to hit a barrier. Customer further claims that at the time of the accident he had his foot on the brake pedal. An FTS inspected the vehicle. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1438	CAMRY	2008	10/30/2007	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that his vehicle downshifts when the cruise control is on and the rpm will rise and the engine will roar.
1439	PRIUS	2007	10/31/2007	Customer called regarding his 2007 Toyota Prius. Specifically, the customer claims that on 3/2/08, the vehicle picked up speed while in reverse and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1440	TUNDRA	2007	10/31/2007	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that vehicle has been shifting erratically and has also been surging and bucking.
1441	ES350	2007	10/31/2007	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle's engine revved up to 5000 RPM before accelerating. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1442	IS250	2006	11/2/2007	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on unknown dates, her RPMs are so high that she has to hit the accelerator or brake to bring them back down. Customer claims that sometimes the RPMs drop so low that you can physically hear it and the engine will sometimes turn off.
1443	TUNDRA	2004	11/2/2007	Customer called regarding his 2004 Toyota Tundra. Specifically, the customer claims that, on unknown dates, the vehicle suddenly unintentionally accelerated when the brake was depressed. Customer claims that the acceleration occurred when the vehicle was already in motion.
1444	TACOMA	2006	11/2/2007	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that when her son is driving the vehicle, the vehicle occasionally lunges forward. A Field Technical Specialist (FTS) inspected the vehicle.
1445	ES350	2007	11/5/2007	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle accelerated and jumped the curb as he went to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1446	4RUNNER	2005	11/5/2007	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on November 2, 2007, her accelerator pedal became stuck. Customer states that the pedal became stuck while she was driving on the highway. Customer states that the vehicle continued to accelerate despite application of the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1447	Camry	2007	11/6/2007	Customer claims that the vehicle fails to accelerate when the gas pedal is depressed. The failure to accelerate occurs when the pedal is pressed 1/4 of the way down, at both slow speeds and when driving 30-40 mph in the city. When continuing to depress the throttle past 1/4 of the way down the vehicle would abruptly downshift and accelerate much faster than expected. FTS inspected the vehicle and found that it had the most current calibration file from bulletin EG036-07 installed. FTS test drove the vehicle and noted that the vehicle operated consistently with other Camrys that had the EG036-07 installed. FTS recorded a snapshot using tech stream of acceleration events for review. No repairs were attempted, the vehicle has the most current ECU calibration.
1448	PRIUS	2007	11/6/2007	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date before she had oil changed, she had mileage of 58-60; after, customer claims the vehicle was running poorly, and cannot get over 46mpg. Customer further claims that when vehicle stopped, vehicle wanted to lunge forward, even though customer was on the brake. Customer further claims that engine was revving loudly, and that she heard the transmission changing gears a lot. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1449	CAMRY	2004	11/6/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that on November 6, 2007 the vehicle sudden accelerated causing an accident. The customer further claims the engine will surge at random intervals. Customer claims that the acceleration and surging occurs while the vehicle is in already in motion and when completely stopped.
1450	TACOMA	2007	11/7/2007	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle revved up when he was at a stop and almost drove through an intersection. Customer claims that sudden acceleration occurred when the vehicle was at a full stop.
1451	TACOMA	2007	11/7/2007	Customer called regarding his company's 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while he was driving on the highway without cruise control on. Customer further claims that he hit the brake pedal and the vehicle continued to accelerate, and that he was able to regain control the vehicle by putting it into neutral, which caused the engine to rev highly, and pumping the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1452	TUNDRA	2007	11/8/2007	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle's rpms were too high in first gear.
1453	TACOMA	2007	11/8/2007	Customer called regarding her 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle lunged and accelerated on its own.
1454	CAMRY	2003	11/8/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, the vehicle suddenly surged while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1455	CAMRY	2003	11/9/2007	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates, her vehicle surged while sitting at stops. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1456	CAMRY	2007	11/10/2007	Customer called regarding his 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle experienced issues with the navigation system. Customer further claims that the vehicle jumped from 25 to 35 MPH. Customer further claims that the wiring harness had to be replaced and the vehicle bounced and jolted. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1457	SEQUOIA	2004	11/12/2007	Customer called regarding her 2004 Toyota Sequoia. Specifically, customer claims that on unknown dates her vehicle surged and lunged forward when she was coming from a stopped position before pressing the accelerator pedal.
1458	CAMRY	2008	11/12/2007	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 11/09/2007 his vehicle suddenly accelerated while driving on the highway and that he could not slow down the vehicle by pressing the brake and shifting to neutral.
1459	TACOMA	2007	11/12/2007	Customer called regarding his company's 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while he was driving on the highway without cruise control on. Customer further claims that he hit the brake pedal and the vehicle continued to accelerate, and that he was able to regain control the vehicle by putting it into neutral, which caused the engine to rev highly, and pumping the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1460	CAMRY	2007	11/12/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the brakes on the vehicle failed. Customer further claims that the vehicle went up over the curb into a garden even though he did not touch the accelerator. Customer claims that sudden acceleration occurred while vehicle was already in motion.
1461	CAMRY	2007	11/14/2007	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on November 10, 2007, his daughter was driving on the interstate when the vehicle suddenly accelerated, causing her to side swipe another vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
1462	CAMRY	2006	11/14/2007	Customer's husband called regarding customer's 2006 Toyota Camry. Specifically, customer claims that on unknown dates when the vehicle was idling at a stop light, the vehicle surged forward.
1463	CAMRY	2007	11/15/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he has had acceleration issues since purchasing the vehicle. Details of the underlying incident are unavailable.
1464	CAMRY	2003	11/15/2007	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on October 5, 2007, her vehicle accelerated at maximum speed causing an accident.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1465	TACOMA	2007	11/15/2007	Customer called regarding his 2007 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on an unknown date the vehicle accelerated on its own from 10 mph to 20 mph while he was driving in a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1466	CAMRY	2008	11/15/2007	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that vehicle surges when in reverse.
1467	RX 330	2005	11/16/2007	Customer called regarding her 2006 Lexus RX 330. Specifically customer claims that on November 15, 2007 her vehicle's accelerator became stuck and the brakes gave out causing her to reverse into a sign pole. Customer further claims that when she put the vehicle into drive, the brakes did not work and she struck some mail boxes and another vehicle.
1468	COROLLA	2008	11/17/2007	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that she feels that there is not enough room between the brake and gas pedals. Customer further claims that on an unknown date, she was at a stop sign and applied the brake pedal, but believes she also applied the gas pedal; customer states that the vehicle wanted to accelerate and she had to apply the emergency brake.
1469	CAMRY	2007	11/20/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he was in an accident. It is unclear whether this accident was due to unintended acceleration. Customer further claims that even before the accident, the vehicle would hesitate and would not accelerate. Customer stated that after the accident the vehicle would not start.
1470	TACOMA	2006	11/20/2007	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on November 19, 2007, the vehicle lunged forward when the customer had his foot on the brake pedal. Customer further claims that this problem caused the vehicle to hit another vehicle in front of him. Customer claims that sudden acceleration occurred when vehicle was at a stop.
1471	IS350	2007	11/26/2007	Customer called regarding his 2007 Lexus IS 350. Specifically, customer claims that on unknown dates, the customer experienced unintended acceleration on five occasions.
1472	TACOMA	2006	11/26/2007	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on November 26, 2007 the vehicle took 5 minutes to lower to 1000 rpm after starting up. Customer further claims that every time he started up the vehicle, the idle seemed high. Customer further claims that when driving the vehicle on the street, he had to put it into neutral to stop the vehicle.
1473	CAMRY	2007	11/26/2007	Customer called regarding his 2007 Toyota Camry LE (V6). Specifically, the customer claims that on an unknown date the vehicle behaved erratically between 20-40 mph. Customer further claims that the vehicle constantly downshifted and surged forward instead of slowing down. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1474	CAMRY	2008	11/27/2007	Customer call regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged, jerked and RPMs shoot up. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1475	TACOMA	2006	11/27/2007	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims that the vehicle's RPMs suddenly increased, which caused an accident on 11/7/2007. It is unknown if FTS inspected the vehicle. The customer further claims the condition occurred when the vehicle was already in motion.
1476	CAMRY	2007	11/28/2007	Customer called regarding his 2007 Toyota Camry LE. Specifically, the customer claims that on an unknown date the vehicle would not slow down. The vehicle surged and revved and hit another vehicle. Customer further claims that the airbag did not deploy. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1477	CAMRY	2007	11/29/2007	Customer called regarding his 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle slipped during acceleration and surged. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
1478	FJ CRUISER	2007	11/29/2007	Customer called about his/her 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on unknown dates, the car surged when it is sitting at a stop light. Customer further claims that at the time of the accident he/she had his/her foot on the brake pedal. Customer claims the surge happened while the vehicle was at a full stop.
1479	CAMRY	2007	11/29/2007	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the motor races and the shifting is very rough. Customer further claims that the vehicle shifts when it shouldn't and hesitates for a long period of time when stepping on the gas pedal.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1480	HIGHLANDER	2006	11/30/2007	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that when she accelerates her vehicle, it hesitates and then surges.
1481	CAMRY	2005	12/3/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on unknown dates, the vehicle will jump. The customer further claims the vehicle's acceleration is unpredictable and that it will hesitate before jumping forward.
1482	AVALON	2008	12/4/2007	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on unknown dates the check engine light came on and the engine seized up and jerked while on the freeway. Customer further claims that after the vehicle was inspected and repaired, the vehicle was stalling out and surging ahead. A Field Technical Specialist inspected the vehicle.
1483	TACOMA	2008	12/5/2007	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle lunged forward and hit the vehicle in front of him while sitting in line at a restaurant drive-through. Customer further claims that the vehicle continued to move forward after he fully pressed the brakes. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1484	RX 400h	2007	12/5/2007	Customer called regarding her 2007 Lexus RX 400h. Specifically, Customer claims she had the vehicle in park and had trouble moving it to reverse. Customer further claims that she had her foot on the brake and finally got it out of park and the vehicle flew backwards and crashed. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1485	HIGHLANDER	2004	12/5/2007	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that in February 2006, he felt his transmission or engine surge when he accelerated after being stopped at a light.
1486	AVALON	2005	12/6/2007	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle hesitated, then surged and jerked forward when accelerating after coasting. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1487	TACOMA	2006	12/7/2007	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that he was at a stop sign when the vehicle lunged forward three times. Customer further claims that he "stomped" on the brake but that he could not stop the vehicle from moving. Customer claims that sudden acceleration occurred when the vehicle was at a full stop.
1488	CAMRY	2005	12/8/2007	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on an unknown date, the vehicle suddenly accelerated and the pedal became stuck in the floored position. It is unknown if the claimed issue occurred while the vehicle was already in motion.
1489	CAMRY	2006	12/8/2007	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the gas pedal went down without pressing on it, and if he pressed on the brake the gas pedal would not release.
1490	AVALON	2007	12/10/2007	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date he was driving in stop and go traffic and when he tried to accelerate there was a loss of power and a clunking feeling. A Field Technical Specialist inspected the vehicle.
1491	CAMRY	2007	12/10/2007	Customer called regarding 2007 Toyota Camry. The nature of the customer's specific complaint is unclear.
1492	AVALON	2008	12/12/2007	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on December 3, 2007, she was driving when the vehicle lurched forward and hit a tree. Customer further claims that the vehicle was jerking and jumping ahead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1493	HIGHLANDER	2008	12/12/2007	Customer called regarding his 2008 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle surged when he tried to stop the vehicle at stop signs. Customer further claims that the air circulation shut off after three minutes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1494	ES 330	2005	12/12/2007	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on unknown dates, her vehicle lurched forward.
1495	COROLLA	2008	12/13/2007	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on December 10, 2007, she was waiting at a traffic light, and when she stepped on the gas the vehicle launched forward into a curb, causing one of the tires to go flat.
1496	CAMRY	2007	12/15/2007	Customer called regarding his 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle slipped into neutral at 20 mph. Customer further claims that the RPMs revved up and the vehicle did not accelerate.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1497	CAMRY	2007	12/15/2007	Customer called regarding his 2007 Camry CE. Specifically, customer claims that on an unknown date the vehicle hesitated in acceleration. The customer further claims that the vehicle has lurched forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1498	CAMRY	2007	12/17/2007	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date that the vehicle was having a power surge problem. The customer further claims the vehicle would not take off from a complete stop. The customer further claims that the vehicle hesitated when accelerated. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1499	ES 330	2005	12/18/2007	Customer called regarding his 2005 Lexus ES 330. Specifically, Customer claims that on two unknown dates, his accelerator stuck and sped his vehicle up to 80-90 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1500	RAV 4	2007	12/19/2007	Customer's wife called regarding his 2007 Toyota RAV4. Specifically, customer's wife claims that on an unknown date the customer was driving on the highway, and the vehicle jumped forward. Customer's wife claims that the sudden acceleration occurred while the vehicle was already in motion.
1501	TACOMA	2007	12/19/2007	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that he was in the process of parking the vehicle in a garage when the vehicle suddenly lurched forward and struck a wall. Customer further claims that his foot was on the brake and not the gas pedal. Customer states that the vehicle made a strange grinding noise before it "shot" forward.
1502	COROLLA	2008	12/19/2007	Customer called regarding his 2008 Toyota Corolla. Specifically, customer claims that when he drives at 50mph, the vehicle will lunge forward. Customer further claims that when the vehicle slows and accelerates again, the lunge forward reoccurs.
1503	TACOMA	2007	12/20/2007	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on December 18, 2007 the vehicle lurched forward into his garage wall when he was in the process of parking the vehicle in his garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1504	Camry	2002	12/21/2007	Customer called about his 2002 Toyota Camry. Specifically, customer claims that on unknown dates, the car's light for speed control would appear on and when he and his wife tried to brake they have been in accidents. Customer further claims that at the time of the accident he and his wife had their feet on the brake pedal. These sudden accelerations have occurred both while the car is stopped and already in motion.
1505	SEQUOIA	2006	12/26/2007	Customer called regarding her 2006 Toyota Sequoia. Specifically, customer claims that on unknown dates his vehicle repeatedly jerked.
1506	SEQUOIA	2003	12/27/2007	Customer called regarding his 2003 Toyota Sequoia SR5. Specifically, Customer claims that on unknown dates when the vehicle was at a stop, the vehicle jumped forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1507	CAMRY	2002	12/28/2007	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on December 21, 2007, she put her vehicle into reverse and it overaccelerated, hitting a brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1508	CAMRY	2006	12/28/2007	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked forward when it was at a complete stop. Customer further claims that on December 26, 2007, she tried to put the vehicle in reverse and it would not go, then started to smoke from underneath the hood. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1509	TUNDRA	2006	12/28/2007	Customer called regarding his 2006 Toyota Tundra 4x2. Specifically, customer claims that on December 5, 2007 while his wife was driving the vehicle, the vehicle accelerated suddenly from 35 MPH to approximately 80 MPHs resulting in an accident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1510	CAMRY	2004	12/28/2007	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that on an unknown date, the vehicle suddenly accelerated and the pedal became stuck in the floored position. The customer claims the sudden acceleration occurred while the vehicle was at a complete stop.
1511	CAMRY	2008	1/2/2008	Customer called regarding her 2008 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle revs, red lined and has hesitation problems. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1512	ES 330	2004	1/2/2008	Customer responded to survey regarding his 2004 Lexus ES 330. Specifically, Customer claims that on unknown dates, the vehicle accelerated even though he was trying to brake, although on occasion he pressed the gas and then the brake and that solved the problem.
1513	ES350	2007	1/2/2008	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle locked up in an intersection on three occasions. Customer further claims that after the vehicle locked up she applied the accelerator and the vehicle's engine revved and then the vehicle went forward. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1514	SIENNA	2005	1/2/2008	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that, December 3, 2007, the vehicle lurched forward while his foot was on the brake in a parking lot. Customer further claims that the vehicle was in an accident as a result. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1515	CAMRY	2008	1/2/2008	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on January 2, 2008, the vehicle lurched forward and hit a post. Customer further claims that the RPMs revved up and accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1516	COROLLA	2006	1/3/2008	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated whenever he slowed the vehicle or brought it to a stop. Customer further claims that he had to use the parking brake to bring the vehicle to a stop, and that he has come close to rear ending other vehicles.
1517	GX 470	2007	1/4/2008	Customer called regarding her 2007 Lexus GX 470. Specifically, customer claims that on January 2, 2008, she was stopped in the vehicle at an intersection when her vehicle accelerated on its own, causing an accident. Customer further claims that she heard the engine accelerate on its own a week earlier. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1518	TACOMA	2006	1/4/2008	Customer called regarding her 2006 Toyota Tacoma. Specifically, customer claims that on January 3, 2007 the vehicle accelerated forward into her garage wall when she was pulling the vehicle into her garage with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1519	COROLLA	2008	1/4/2008	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on December 27, 2007, she was pulling out of a driveway when her vehicle suddenly accelerated, running into the neighbor's yard, mail box, another vehicle, and finally a neighbor's garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1520	CAMRY	2007	1/4/2008	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle hesitates from a stop and will jerk forward. Customer claims that the sudden acceleration occurred when the vehicle was at a full stop.
1521	CAMRY	2008	1/4/2008	Customer called regarding his 2008 Toyota Camry. Specifically, call claims that his vehicle high idles when it starts and surges when he starts to accelerate.
1522	GX 470	2006	1/4/2008	Customer called regarding his 2006 Lexus GX 470. Specifically, Customer claims that on an unknown date, the vehicle accelerated through an intersection and he could not stop the vehicle.
1523	CAMRY	2004	1/4/2008	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that on an unknown date, the vehicle suddenly accelerated and the pedal became stuck in the floored position. The customer claims the sudden acceleration occurred while the vehicle was at a complete stop.
1524	SIENNA	2007	1/5/2008	Customer called regarding his 2007 Toyota Sienna. Specifically, the customer claims that on unknown dates, the vehicle's RPM rises and falls without warning. Customer claims that the sudden acceleration occurred when the vehicle was at a complete stop and her foot was on the brake.
1525	TUNDRA	2007	1/7/2008	Customer called regarding his 2007 Toyota Tundra. Specifically, the customer claims that he has concerns regarding the acceleration and that on several unknown dates, the acceleration has occurred without warning. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1526	CAMRY	2007	1/8/2008	Customer called regarding her 2007 Toyota Camry XLE. Customer claims that on an unknown date the vehicle surged forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1527	COROLLA	2006	1/9/2008	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on January 8, 2008, the vehicle accelerated into a ditch when she pushed the brake pedal down, and the vehicle continuously made a jerking feeling and the RPM went up and then went right back down. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1528	TACOMA	2004	1/9/2008	Customer called regarding his 2004 Toyota Tacoma Prerunner (V6). Specifically, Customer claims that on January 2, 2008, he was driving the vehicle 35 mph and stepped on the gas to avoid a rear-end collision. Customer further claims that the throttle was then red-lining. Customer claims that he applied the brakes but still hit the vehicle in front of him. Customer claims the vehicle continued to rev, even after impact with his foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1529	CAMRY	2007	1/9/2008	Customer emailed regarding her 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates her vehicle hesitated.
1530	CAMRY	2007	1/9/2008	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle powers down unexpectedly and has almost caused some accidents. Customer further claims that the only way to get the car to downshift is to press hard on the accelerator pedal, which causes the vehicle to lunge to four or five thousand RPMs. Customer states that she perceives hesitation when accelerating.
1531	TACOMA	2007	1/9/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle had engine trouble and would stall. An FTS inspected the vehicle.
1532	CAMRY	2007	1/11/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he feels hesitation while accelerating and feels that this issue is dangerous. Customer further claims that he experiences the hesitation between 2000 and 2500 RPMs.
1533	ES350	2007	1/14/2008	Insurer called on behalf of customer. Customer complains regarding 2007 Lexus ES 350. Customer claims that on an unknown date, while backing out of garage, the vehicle surged, hitting a snowbank and tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1534	ES350	2007	1/14/2008	Customer called about his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date when his wife was driving the vehicle, the car suddenly accelerated.
1535	COROLLA	2005	1/14/2008	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on January 12, 2008, the vehicle's accelerator got stuck and the vehicle ran into her house. A Field Technical Specialist (FTS) inspected the vehicle.
1536	CAMRY	2007	1/15/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that the vehicle hesitates when she accelerates.
1537	CAMRY	2007	1/15/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he presses on the gas pedal, the RPM goes up although the car doesn't accelerate. Customer further claims that this generally happens after he has stopped the vehicle.
1538	CAMRY	2007	1/16/2008	Customer called regarding her 2007 Toyota Camry LE (V6). Customer claims that the vehicle jumped. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1539	SIENNA	2005	1/16/2008	Customer called regarding her 2005 Toyota Sienna. Customer claims that on December 3, 2007, while parking, the vehicle lurched forward although her foot was on the brake, hitting a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1540	CAMRY	2007	1/17/2008	Customer called regarding his 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1541	CAMRY	2002	1/18/2008	Customer called regarding his 2002 Toyota Camry LE (V6). Specifically, Customer claims that on January 16, 2008, while he was stopped, his vehicle unintentionally accelerated causing him to crash into another vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1542	CAMRY	2005	1/18/2008	Customer called regarding his 2005 Toyota Camry. Specifically, the customer claims that on January 17, 2008 the vehicle sudden accelerated while her foot was on the brake. The customer further claims the engine will surge at random intervals. Customer claims that the acceleration and surging occurs while the vehicle is in already in motion.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
1543	TACOMA	2007	1/22/2008	Customer called regarding his 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle's engine revved up when he applied the brakes. Customer further claims that he had to swerve to avoid hitting a vehicle, and that he put the vehicle in neutral to shut it down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1544	GS 300	2006	1/22/2008	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on an unknown date, his vehicle took off as he was pulling into a parking spot, causing him to hit a pole. Customer further claims he had acceleration problems on two other occasions.
1545	SCION tC	2008	1/22/2008	Customer called regarding her 2008 Scion TC. Specifically, Customer claims that on three unknown dates, while the vehicle was at a stop, the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a complete stop.
1546	CAMRY	2004	1/22/2008	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that an unknown date the vehicle sudden accelerated while her foot was on the brake. The customer further claims the engine will surge at random intervals. Customer claims that the acceleration and surging occurs while the vehicle is in already in motion.
1547	CAMRY SOLARA	2006	1/22/2008	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked when accelerating in the first three gears.
1548	COROLLA	2006	1/24/2008	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle lurched forward and accelerated. Customer further claims that this has happened about 11 times and happens at least once a month.
1549	CAMRY	2007	1/25/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that when trying to accelerate, the vehicle takes off. Customer appears to believe that this problem relates to a sensor in her tire.
1550	CAMRY	2007	1/25/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her accelerator is sensitive and appears to want to "peel out."
1551	CAMRY	2005	1/26/2008	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on January 25, 2008 the vehicle suddenly lunged forward. The customer further claims the engine will lunge at random intervals. Customer claims that the acceleration occurs while the vehicle is in already in motion.
1552	CAMRY	2007	1/28/2008	Customer's wife called regarding customer's 2007 Toyota Camry. Specifically, customer's wife claims that she was reversing the vehicle in the driveway and put her foot on the brake, but the vehicle went faster the more she braked, causing her to go through a fence and a basketball hoop. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1553	CAMRY	2007	1/29/2008	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues. Customer further claims that the vehicle jerked. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1554	CAMRY	2007	1/30/2008	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that the vehicle hesitated when accelerated from stop to start and between 18-20 mph. Customer further claims that the vehicle surged after a 4 second delay. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop and already in motion.
1555	COROLLA	2007	1/30/2008	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that in September 2007 and on January 28, 2008 the vehicle was involved in two accidents. Customer further claims that the accidents were caused by the vehicle over accelerating.
1556	CAMRY	2008	1/31/2008	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle jumped ahead. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1557	TACOMA	2006	1/31/2008	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated 1/5/2008. It is unknown if FTS inspected the vehicle. It is unknown if the claimed acceleration occurred while the vehicle was already in motion.
1558	TUNDRA	2005	1/31/2008	Customer called regarding his 2005 Toyota Tundra SR5 (V8). Specifically, Customer claims that on unknown dates, his vehicle over-accelerated when he depressed the gas pedal.
1559	COROLLA	2006	2/4/2008	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on February 3, 2008 the vehicle surged forward over a curb and into the front glass of a laundromat while she was turning into a parking space with her foot on the brake.

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1	Model	Model Year	Report or claim date	Summary
1560	TACOMA	2008	2/4/2008	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer claims that on February 2, 2008 the vehicle's throttle slammed to the floor and the engine revved while she was driving around 10 mph. Customer further claims that she had to put the vehicle in neutral and shut off the ignition to shut it down. Customer further claims that on an unknown prior date the vehicle's accelerator got stuck in the floor mat. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1561	CAMRY	2006	2/4/2008	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on January 12, 2008, she pulled into a parking lot and put her foot slightly on the gas when the vehicle accelerated too much and crashed into a building. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1562	CAMRY	2007	2/4/2008	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle intermittently jerked. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1563	COROLLA	2007	2/5/2008	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's engine surged and the gas pedal almost hit the floor.
1564	CAMRY	2007	2/6/2008	Customer called regarding her 2007 Toyota Camry SE (V6). Specifically, customer claims that on an unknown date the vehicle jerked really hard. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1565	CAMRY	2004	2/6/2008	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, his vehicle took off, causing him to collide with a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1566	ES350	2007	2/6/2008	Customer called regarding her 2007 Lexus ES 350. Customer claims that on an unknown date, the vehicle accelerated and she had to drive into a ditch to slow it. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1567	CAMRY	2007	2/7/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer wants to know whether there were any recalls on her vehicle. Customer further claims that she is not pleased with the acceleration and shifting in her vehicle. The details of any underlying incident(s) are unclear.
1568	CAMRY	2007	2/7/2008	Customer called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle surged. Customer further states that the vehicle dragged and released while driving 40-50 mph. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1569	ES 300	2003	2/7/2008	Customer called regarding his 2003 Lexus ES 300. Specifically, Customer claims that on an unknown date, as he was stepping on the gas to come out of a driveway, the vehicle took off and sped across the street, hitting a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1570	AVALON	2007	2/7/2008	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on an unknown date the transmission did not respond when she pressed the accelerator pedal. Customer further claims that the vehicle lurched or stayed in neutral then jerked forward.
1571	4RUNNER	2006	2/7/2008	Customer called regarding her 2006 Toyota 4Runner. Specifically, customer claims that on an unknown date while driving on the freeway, her gas pedal became stuck, causing the vehicle to accelerate. Customer claims that the gas pedal would not disengage, and that she had to "ride" her brakes to stop the vehicle.
1572	TUNDRA	2008	2/8/2008	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that vehicle idles at 1600 RPMs, which he feels is too high.
1573	YARIS	2007	2/9/2008	Customer called regarding his 2007 Toyota Yaris. Specifically, the customer claims that on February 2, 2008 the vehicle began to jerk while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1574	TUNDRA	2006	2/11/2008	Customer called regarding his 2006 Toyota Tundra 4x2. Specifically customer claims that on an unknown his vehicle accelerated 30-40 MPH on its own causing him to strike a tree. The customer claims this sudden acceleration occurred while the vehicle was already in motion.
1575	TACOMA	2007	2/11/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle lurched forward when at a stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1576	TACOMA	2007	2/11/2008	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims to have experienced a loss of throttle control in 2008. It is unknown if FTS inspected the vehicle. It is also unknown if the claimed loss of control occurred while the vehicle was already in motion.

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1577	AVALON	2006	2/12/2008	Customer called regarding his 2006 Toyota Avalon Touring. Specifically, customer claims that on an unknown date, four months after the vehicle's purchase, he felt a slight hesitation upon acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1578	YARIS	2007	2/12/2008	Customer called regarding his 2007 Toyota Yaris. Specifically, the customer claims that, on unknown dates, the accelerator sticks.
1579	CAMRY	2007	2/13/2008	Customer called regarding his 2007 Toyota Camry XLE. Customer claims that the vehicle surges and does not accelerate properly.
1580	RX 330	2005	2/15/2008	Customer called regarding her 2005 Lexus RX 330. Specifically, Customer claims that on two unknown dates, the engine of her vehicle jumped and revved.
1581	CAMRY	2007	2/15/2008	Customer called regarding her 2007 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date the vehicle slowed down and then accelerated. Customer further states that the vehicle jerked. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop.
1582	ES350	2007	2/19/2008	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, he experienced an acceleration issues.
1583	CAMRY	2007	2/20/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he presses the gas pedal, there is a delay before the vehicle accelerates. Customer further claims that there is a noise coming from the dashboard area.
1584	TACOMA	2007	2/21/2008	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, which caused an accident on 2/19/2008. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was at a complete stop.
1585	CAMRY	2007	2/21/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that the vehicle hesitates when he accelerates. Customer further claims that he drove on the freeway and the hesitation became very strong, and now he is concerned about lower speeds as well.
1586	PRIUS	2007	2/21/2008	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date, the vehicle lurched forward without pressing the accelerator, resulting in a collision with parked van despite engaging the emergency brake.
1587	CAMRY	2006	2/25/2008	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates after startup her vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1588	RAV 4	2006	2/26/2008	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle lunged forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1589	TACOMA	2005	2/26/2008	Customer called regarding 2005 Toyota Tacoma Prerunner L/B. Specifically, customer claims that he experiences a "hard bump" when starting the car from a stop. Customer further claims that this issue happens frequently.
1590	CAMRY	2002	2/27/2008	Customer called regarding her 2002 Toyota Camry XLE. Specifically, Customer claims that on January 31, 2008, her gas pedal stuck, possibly due to her floor mat, causing her to hit a concrete pylon. An FTS inspected the vehicle.
1591	TUNDRA	2008	2/27/2008	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that his vehicle idles too fast. Customer further claims that when he applies the brakes, the idle seems to increase and the vehicle lunges forward. Customer states that the idle is even greater when the vehicle is cold.
1592	RAV 4	2007	2/28/2008	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the throttle stuck and the vehicle continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1593	CAMRY	2006	2/28/2008	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle revved to over 7000 RPMs while parked or stopped at a stop sign. Customer futher claims that the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1594	PRIUS	2007	2/29/2008	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the customer's child had 2 asthma attacks while in the car due to smell that cannot be eliminated. Customer further claims that he heard a clicking noise when braking, and when stopped (in park and drive), vehicle would lurch forward when shifting from electric to battery mode, especially when in park and a/c is on. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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1595	CAMRY	2008	2/29/2008	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle lunged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1596	PRIUS	2008	3/3/2008	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle lost control while in reverse and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1597	TUNDRA	2008	3/4/2008	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own.
1598	AVALON	2006	3/4/2008	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle idled too high. Customer further claims that the vehicle hesitated while accelerating around turns.
1599	LAND CRUISER	2004	3/5/2008	Customer called about his/her 2004 Toyota Land Cruiser. Specifically, customer claims that on an unknown date, the car roared backward. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1600	ES 300	2003	3/5/2008	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates, her vehicle has lurched forward while making left turns, even when the brakes are being applied. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1601	FJ CRUISER	2007	3/10/2008	Customer called about his 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on three unknown dates, the car, while stopped and idling, revved from 0 to 3000 rpms. Customer claims the sudden acceleration happened while the vehicle was at a full stop.
1602	SCION TC	2005	3/11/2008	Customer called regarding her 2005 Scion TC. Specifically, Customer claims that on two unknown dates, the vehicle accelerated while she was braking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1603	TUNDRA	2008	3/13/2008	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that the idle speed on the vehicle goes up to 2000 RPM and that the vehicle lunges when put into gear.
1604	RAV 4	2007	3/17/2008	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that the accelerator pedal stuck. Customer further claims that he engine revved up.
1605	CAMRY	2008	3/17/2008	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that vehicle sometimes hesitates and other times accelerates like she has hit the accelerator pedal.
1606	COROLLA	2007	3/18/2008	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on March 12, 2008, the vehicle accelerated as she was driving around a downhill curve at about 15 mph with her foot on the brake, causing her to run off the road into some trees and briars. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1607	CAMRY	2007	3/18/2008	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle hesitated and then accelerated. Customer further states that the vehicle jerked. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop.
1608	TACOMA	2006	3/20/2008	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle revved too hard and idled too high. An FTS inspected the vehicle.
1609	SEQUOIA	2006	3/21/2008	Customer called regarding 2006 Toyota Sequoia. Specifically, customer claims that on an unknown date his wife was driving the vehicle on the freeway with the cruise control on when the vehicle kept accelerating.
1610	TACOMA	2008	3/24/2008	Customer called in regarding a 2008 Toyota Tacoma. The customer claims the vehicle revs and suddenly unintentionally accelerates but does not specify a specific date. FTS did not inspect the vehicle. The customer claims the vehicle was moving at the time it unintentionally accelerated.
1611	RX 350	2008	3/25/2008	Customer called regarding his 2008 Lexus RX 350 (V6). Specifically, Customer claims that on an unknown date, his wife put the vehicle into park, but the accelerator stuck, causing the vehicle to lurch into a wall. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1612	TACOMA	2005	3/26/2008	Customer called regarding her 2005 Toyota Tacoma. Specifically, customer claims that on February 26, 2008 the vehicle accelerated suddenly while she was braking to a stop behind two other vehicles at a traffic light. Customer further claims that the vehicle's engine revved and the vehicle lurched forward before coming to a stop, causing her to run into the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1613	ES 350	2008	3/28/2008	Customer claims that around 40 mph, the vehicle jerks when reaccelerating. Vehicle road tested and condition confirmed. Fluid level checked. Vehicle is performing the same as other like vehicles.
1614	AVALON	2005	3/28/2008	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jumped forward upon acceleration. Customer further claims that the steering wheel was loose even after she tightened it.
1615	CAMRY	2007	3/28/2008	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that the vehicle jerked when accelerated. Customer states that the the sudden acceleration occurred while the vehicle was at a full stop.
1616	CAMRY	2007	3/31/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she experiences hesitation when she attempts to accelerate. Customer further claims that infrequently this happens as she is cruising at approximately 60 to 65 miles per hour on flat ground. Customer states that she has to cancel the cruise control or adjust the cruise control to a lower speed in order to stop the hesitation.
1617	HIGHLANDER	2005	3/31/2008	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that there is an acceleration issue when she presses on the gas, and the vehicle will not drive uphill.
1618	RAV 4	2005	4/1/2008	Customer called regarding his 2005 Toyota RAV4. Specifically, customer claims that on an unknown date the RPM rosed on its own and vehicle moved at 5 mph. Customer claims that the sudden acceleration occurred while the car was at a full stop.
1619	TACOMA	2007	4/1/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on March 31, 2008 the vehicle's accelerator jumped two times. Customer further claims that on April 1, 2008 the vehicle accelerated on its own and surged when he was turning into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1620	ES350	2008	4/1/2008	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle made engine noise for 5 to 10 minutes after it starts. Customer further claims that the vehicle jerked when he drove it.
1621	RAV 4	2006	4/2/2008	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, customer was driving in a parking garage and the vehicle lurched forward, causing her to hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1622	PRIUS	2007	4/2/2008	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when vehicle was at a stop, the engine came on and races forward when going down a hill, with the brakes on. Customer further claims that there was a rattle noise in the body of the car. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1623	RAV 4	2006	4/2/2008	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, customer was driving in a parking garage and the vehicle lurched forward, causing her to hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1624	COROLLA	2005	4/2/2008	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle surged forward while driving. A Field Technical Specialist (FTS) inspected the vehicle.
1625	Camry	2005	4/4/2008	Customer claims that there is a surge on moderate to heavy acceleration between 30-50 mph. Vehicle test-driven and customer's complaint verified. Heath check performed; A/F sensor voltage found to be erratic when all other monitors were linear. After A/F sensor was disconnected the concern was no longer present.
1626	LS 460	2007	4/4/2008	Customer claims that when applying the brake at 20 to 30 miles per hour, the car will start to brake, after which it jerks and lunges forward approximately five (5) feet before stopping. Customer further claims that this has happened three (3) times. Vehicle was driven in an attempt to verify and duplicate the concern. Although a slight surge in the car was felt as the car slowed, the concern could not be duplicated.
1627	CAMRY	2007	4/4/2008	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1628	AVALON	2006	4/4/2008	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while his wife was backing down the driveway the vehicle suddenly went into full throttle, causing her to crash into the garage. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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1629	TUNDRA	2007	4/5/2008	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle always revs up to 1800 RPM when it is first turned on. Customer further claims that if he does not keep his foot on the brake when shifting from reverse to drive, the vehicle will surge forward. Customer states that gas pedal is sensitive and causes the vehicle to surge forward, and that when the vehicle goes down a steep hill, it will downshift for no reason. Customer claims that sudden acceleration occurred both while the vehicle was at rest and when it was already in motion.
1630	CAMRY	2007	4/7/2008	Customer call regarding his 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle revved up. Customer futher claims that the vehicle hesitated and then jumped forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1631	TACOMA	2006	4/9/2008	Customer called regarding 2006 Toyota Tacoma Prerunner. Specifically, customer claims that vehicle lurches forward when it is at a stop. Customer claim that sudden acceleration occurs while the vehicle is at a full stop.
1632	TACOMA	2007	4/9/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged slightly when travelling at highway speeds, and the vehicle's engine seemed to lag when going 25 to 40 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1633	TACOMA	2007	4/9/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged, and that the vehicle had problems with air distribution. An FTS inspected the vehicle.
1634	Prius	2008	4/9/2008	Customer called about her 2008 Toyota Pirus. Specifically, customer claims that on unknown date, the car has a slight shudder when at a stop light and accelerates to go forward. Customer claims the sudden acceleration happened while the vehicle was at a full stop.
1635	TACOMA	2007	4/10/2008	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that his vehicle sometimes surges or lurches forward when coming to a stop. Customer further claims that the vehicle feels like it's being pushed forward. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
1636	CAMRY	2003	4/10/2008	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates, her vehicle has accelerated on its own. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and already in motion.
1637	Tacoma	2006	4/11/2008	An Investigation Report from the United States issued on April 15, 2008 concerning a 2006 Toyota Tacoma states that the customer complained that at times the vehicle's idling speed rose to 1800 - 2000 RPM (target level for warm engine is 700 rpm). Dealer states that this is the second time the vehicle has been in the shop. A reenactment was performed but no DTC code appeared. The air flow sensor, engine ECU and throttle were replaced in the past but the problem was not eliminated. The phenomenon has been confirmed on other models in 1SE while maintaining a half-clutch position while the vehicle is stopped. It is suspected that the condition is caused by the excessive learning effect of the electronic throttle ISC. The condition was not reproduced during further testing. The customer's driving pattern is unclear but it is suspected that the learning effect of the electronic throttle ISC is the cause of the problem.
1638	ES350	2007	4/11/2008	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle lunged forward when she drove it. Customer further claims that the vehicle's engine idled loudly like a diesel engine.
1639	ES 350	2008	4/14/2008	Customer claims that when vehicle goes from 50 to 30mph and then reaccelerates, transaxle jerks. Transaxle fluid level inspected. Fluid procedure performed and ECT memory reset.
1640	CAMRY	2003	4/14/2008	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on April 3, 2008, her vehicle revved and surged as she was parking, with her foot on the brake and about to shift into park. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1641	ES350	2007	4/14/2008	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, while driving the vehicle, she felt a jolt of acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1642	CAMRY	2006	4/15/2008	Customer emailed regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date his wife was driving slowly into the garage when the vehicle suddenly accelerated and slammed into a shelf. Customer further claims that on an unknown date his daughter hit a vehicle in front of her while stopping at a light. Customer further claims that on an unknown date his wife expreienced sudden acceleration again. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1643	TACOMA	2007	4/16/2008	Customer called regarding 2007 Toyota Tacoma Prerunner L/B. Specifically, customer claims that on April 15, 2007, his employee shifted the vehicle into reverse and the vehicle lunged backwards when the employee's foot was not on the accelerator pedal. The vehicle allegedly collided with a loading dock, causing damage to the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1644	CAMRY	2007	4/16/2008	Customer called regarding his 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle surged. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1645	ES 330	2005	4/18/2008	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates, his accelerator sticks, causing the vehicle to speed to 80-90 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1646	IS250	2008	4/21/2008	Customer called regarding his 2008 Lexus IS 250. Specifically, customer claims that on an unknown date while his wife was driving the vehicle, the vehicle suddenly started accelerating from about 60mph to 80 mph. Customer claims that that his wife put the vehicle into park.
1647	IS250	2008	4/21/2008	Customer called regarding his 2008 Lexus IS 250. Specifically, customer claims that on an unknown date, while driving, his vehicle accelerated from 60 mph to 80 mph. Customer claims that he put the vehicle in neutral.
1648	AVALON	2008	4/21/2008	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on an unknown date there were slight jerks from gear to gear when he accelerated the vehicle. Customer further claims that the vehicle vibrated when at a stop or in reverse.
1649	COROLLA	2006	4/22/2008	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated unintentionally while he was pulling into a parking facility, causing him to run into another vehicle twice. Customer further claims that he then put the vehicle in neutral and that the vehicle redlined until he shut off the ignition. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1650	ES 330	2005	4/24/2008	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on March 18, 2008, his wife was driving the vehicle when it suddenly accelerated, causing her to hit some shrubs and railway ties.
1651	RX 330	2006	4/28/2008	Customer called regarding his 2006 Lexus RX 330. Customer claims that on an unknown date, the accelerator stuck while driving. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1652	TACOMA	2006	4/28/2008	Claimant called in regarding a 2006 Toyota Tacoma. The customer claims the vehicle suddenly unintentionally accelerated in September of 2007 and caused a non-injury accident. FTS did not inspect the vehicle. The customer claims the vehicle accelerated suddenly, but it is unknown if the vehicle was moving prior to the accident.
1653	FJ CRUISER	2008	4/29/2008	Customer called about his 2008 Toyota FJ Cruiser. Specifically, customer claims that on three unknown dates, his was driving the car when it suddenly accelerated. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1654	LX 570	2008	4/29/2008	Customer called regarding her 2008 Lexus LX 570. Specifically, Customer claims that while driving on the highway, the vehicle suddenly accelerated and continued to do so even after letting off the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1655	COROLLA	2005	4/30/2008	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's acceleration was not smooth and the vehicle took off and jumped forward. Customer further claims that the problem was worse when driving downhill.
1656	TACOMA	2005	4/30/2008	Customer called regarding her 2005 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and took off when she applied the brakes while pulling into a parking space in a parking garage. Customer further claims that she hit the wall of the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1657	AVALON	2008	5/1/2008	Customer emailed regarding his 2008 Toyota Avalon. Specifically, customer claims that on unknown dates he felt a loss of engine compression when the transmission was downshifting as if it had gone into neutral rather than a lower gear.
1658	PRIUS	2006	5/1/2008	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on 5/01/08, the vehicle just took off and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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1659	SCION tC	2008	5/1/2008	Customer called regarding her 2008 Scion TC. Specifically, Customer claims that on April 14, 2008, Customer's husband was driving and the vehicle accelerated when the brakes were depressed, causing an accident. Customer further states the brakes didn't engage right away after the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1660	CAMRY	2007	5/1/2008	Customer called regarding his 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle jumped gears and hesitated at 25 mph and then surged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1661	SEQUOIA	2007	5/2/2008	Customer called regarding his 2007 Toyota Sequoia. Specifically, customer claims that on unknown dates his vehicle has, on repeated occasions, surged after stopping with the brakes applied.
1662	PRIUS	2007	5/2/2008	Customer called regarding her Toyota Prius Touring Edition. Customer claims that on an unknown day in April 2008, she was pulling into a parking spot when the vehicle lurched forward. Customer further claims that on August 16, 2009, as she was pulling into a parking space, the vehicle lurched forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1663	HIGHLANDER	2008	5/5/2008	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1664	SCION TC	2005	5/6/2008	Customer called regarding her 2005 Scion TC. Specifically, customer claims that on unknown dates, her vehicle lurched when steadily pressing the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1665	CAMRY	2008	5/6/2008	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that the vehicle will sometimes decelerate and other times accelerate by itself while he is driving it on the highway.
1666	ES 330	2005	5/6/2008	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on an unknown date, his wife was driving the vehicle when it suddenly accelerated, causing her to hit a rail. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1667	COROLLA	2007	5/9/2008	Customer emailed regarding his 2007 Toyota Corolla. Specifically, customer claims that on May 5, 2008, the vehicle continued forward when he took his foot off of the gas pedal while pulling into a parking spot, causing him to run into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1668	SIENNA	2006	5/12/2008	Customer called regarding his 2006 Toyota Sienna. Specifically, the customer claims that on unknown dates, the vehicle will hesitate when the accelerator is depressed and then launches forward.
1669	CAMRY	2007	5/14/2008	Customer called regarding his 2007 Toyota Camry SE (V6). Specifically, customer claims that on an unknown date the vehicle hesitated when accelerated and jerked forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1670	COROLLA	2007	5/19/2008	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle's gas pedal started to stick while he was going into a parking lot, causing him to almost run into a tree.
1671	COROLLA	2005	5/19/2008	Customer's mother called regarding customer's 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle switched into a gear that felt like it was on cruise control and accelerated at high speeds without pressing on the accelerator pedal.
1672	LS 400	1998	5/19/2008	Customer called regarding her 1998 Lexus LS 400. Specifically, Customer claims that on an unknown date, the vehicle suddenly accelerated as it was slowly pulling into a parking space, causing it to go over a curb and hit a wall. Customer further claims that the vehicle continued to rev after it hit the wall and returned to idle after being put into park. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1673	SIENNA	2008	5/19/2008	Customer called regarding his 2008 Toyota Sienna. Specifically, the customer claims that on unknown dates, the vehicle will go forward on its own when downshifting. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1674	TACOMA	2006	5/19/2008	Customer called regarding her 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle revved up very high when starting up and made a loud noise when backing up.

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1675	LAND CRUISER	2008	5/20/2008	Customer called about his 2008 Toyota Land Cruiser. Specifically, customer claims that on unknown dates, the car's accelerator got stuck to the floor mat.
1676	RX 400h	2006	5/22/2008	Customer called regarding his 2006 Lexus RX 400h Hybrid. Specifically, customer claims that on unknown dates, his vehicle has surged while pressing either the gas pedal or brake pedal. On one such occasion, the vehicle surged into a pole, causing bumper damage. A FTS inspected the vehicle.
1677	TACOMA	2008	5/22/2008	Customer called in regarding a 2008 Toyota Tacoma. The customer claims the vehicle does not return to idle position after accelerating but did not provide a specific date. FTS did not inspect the vehicle. The customer claims this occurs at highway speeds.
1678	CAMRY	2005	5/22/2008	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on May 4, 2008 the vehicle suddenly unintentionally accelerated, which caused a minor accident in a parking lot. Customer claims that the acceleration occurred while the vehicle was already in motion.
1679	AVALON	2007	5/23/2008	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on May 22, 2008, she attempted to stop when she notice a vehicle ahead of her but when she applied the brakes the vehicle surged and hit the other vehicle. Customer further claims that on unknown dates before the accident the vehicle was lurching and surging and she took the vehicle to the dealer on May 17, 2008 to complain. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1680	CAMRY	2009	5/24/2008	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving, he accelerated to get onto a freeway onramp, and when he took his foot off of the accelerator the throttle locked and raced. Customer further states that he stood on the brake and switched the shift lever into neutral, but the engine still continued to race. Customer claims that during this time, the vehicle was accelerating uncontrollably, and that after about 30 seconds of the engine racing (while still depressing the brake pedal very hard) he switched the shift lever back into drive, which caused the engine to regain throttle control.
1681	ES350	2007	5/27/2008	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, his vehicle pulled into the right hand lane, and accelerated without intention. Customer claims that that he hit the emergency brake, but the vehicle did not stop. Finally, he claims, that after 3 miles of steering past vehicles, he was able to shift the vehicle into reverse, then neutral bringing the vehicle to a stop.
1682	COROLLA	2006	5/27/2008	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle wanted to take off on her when she was at a dead stop.
1683	TACOMA	2008	5/29/2008	Customer called regarding his 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle experienced uncontrolled acceleration and climbed over the curb and into an embankment. Customer further claims that he pressed the brake hard and that his foot was on the brake the whole time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1684	PRIUS	2007	5/29/2008	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while at a stop sign or just before a turn, when car was traveling at 5-10 mph, more commonly on a downhill incline and when pavement is irregular or bumpy, the vehicle transitioned from electric to gasoline power and made a sudden lunge forward lasting 1-2 seconds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1685	TACOMA	2008	5/29/2008	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on May 29, 2008 the vehicle revved and pulled forward as he was pulling into a traffic lane from a parking lot, causing him to collide with the vehicle in front of him. Customer further claims that the vehicle continued to move forward after he fully pressed the brakes, and that the tires were screaming and smoking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1686	TACOMA	2007	6/2/2008	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle kept moving on its own when cruise control was initiated.
1687	TACOMA	2007	6/2/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle idled high upon first starting it up in the morning.
1688	CAMRY	2004	6/3/2008	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that he experienced an instance of unintended acceleration. Customer claims that on an unknown date, he started up his car and put it into drive when the vehicle started to roar. Customer further claims that the accelerator pedal went straight to the floorboard and the brake didn't work.
1689	RAV 4	2006	6/3/2008	Customer called about his/her 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, the car suddenly accelerated causing an accident.

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1690	CAMRY	2008	6/3/2008	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged to 80 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1691	TACOMA	2007	6/3/2008	Customer called regarding her 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle surged and was hard to start and lacked power.
1692	ES 330	2004	6/4/2008	Customer called regarding her 2004 Lexus ES 330. Customer claims that she feels that vehicle accelerates and brakes at the same time.
1693	TACOMA	2005	6/4/2008	Customer called regarding her 2005 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle's engine made a loud noise, and when she went to pull over, the brakes did not work. Customer further claims that she was able to stop the vehicle by shifting into a lower gear and applying the emergency brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1694	PRIUS	2006	6/5/2008	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on an unknown date in 2008 the vehicle was stopped in a parking spot when it lurched forward over the parking barrier. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1695	CAMRY	2007	6/5/2008	Customer's wife called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle experienced hesitation issues and jumped when coming to a full stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1696	TUNDRA	2007	6/5/2008	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle's engine idles very high and makes a noise. Customer further claims that the vehicle vibrates when driving on the freeway. A Field Technical Specialist (FTS) inspected the vehicle.
1697	RX 330	2004	6/5/2008	Customer called regarding her 2004 Lexus RX 330. Specifically, Customer claims that on April 9, 2008, while driving, the vehicle started pulling to the left and accelerating, causing Customer to lose control and hit a mailbox. Customer further claims that the issue occurred again later. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1698	SEQUOIA	2008	6/5/2008	Customer emailed regarding her 2008 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle had a fast idle upon starting up, and that she wanted to slow down the start up idle.
1699	MATRIX	2009	6/5/2008	Customer called regarding her 2009 Toyota Corolla. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1700	TACOMA	2007	6/6/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's throttle stuck for approximately 20 seconds when driving at altitudes above 4000 feet.
1701	CAMRY	2003	6/7/2008	Customer called regarding her 2003 Toyota Camry LE. Specifically, Customer claims that on unknown dates the vehicle lunged forward after coming to a complete stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1702	CAMRY	2008	6/10/2008	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that vehicle accelerates slightly when driving without pressing the accelerator pedal. Customer claims that he has been waiting over two months for a Field Technical Specialist (FTS) to inspect his vehicle.
1703	4RUNNER	2007	6/10/2008	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle lunged while his foot was on the brake.
1704	TACOMA	2007	6/13/2008	Customer called regarding 2007 Toyota Tacoma Prerunner L/B. Specifically, customer claims that he was stepping on the brake and trying to shift the vehicle into reverse when he noticed that the RPMs went up very high. Customer claims that he heard a clunk when the vehicle jerked forward. Customer further claims that the vehicle accelerated forward, hitting a wall even though he had his foot on the brake. A Field Technical Specialist (FTS) failed to inspect the vehicle. Customer claims that sudden acceleration occurred whiel the vehicle was at a full stop.
1705	TACOMA	2008	6/13/2008	Customer emailed regarding his 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle seemed to surge when stopped with the brakes applied.
1706	HIGHLANDER	2007	6/16/2008	Customer called regarding her 2007 Toyota Highlander. Specifically, customer claims that on June 13, 2008, she was reversing out of her driveway and had her foot on the brake when the vehicle "floored" and hit the building wall. Customer further claims that she had a similar incident where she lost control of the vehicle two weeks earlier.

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1707	CAMRY	2007	6/20/2008	Customer's wife called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle experienced a hesitation issue and then takes off. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1708	SEQUOIA	2007	6/20/2008	Customer called about her 2007 Toyota Sequoia 2WD. Specifically, customer claims that on June 19, 2008, the car jumped from 0 to 60. Customer further claims that everytime she took her foot off the brake the car swerved out of control. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1709	TUNDRA	2005	6/20/2008	Customer called about his/her 2005 Toyota Tundra. Specifically, customer claims that on an unknown date, the car lurched forward while stopped at light. Customer further claims that at the time of the accident he/she had his/her foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was at a full stop.
1710	HIGHLANDER	2004	6/23/2008	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on an unknown date, the vehicle was idling at approx. 1 mph when it surged and almost hit another vehicle. Customer further claims that her foot was not on the accelerator at the time, and that she stopped the vehicle by slamming on the brakes.
1711	AVALON	2007	6/23/2008	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the RPM went up to 2000 at start up, and when put into gear the vehicle jerked because it was idling too high.
1712	CAMRY	2008	6/23/2008	Customer called regarding his 2008 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date the vehicle surged on a hill while in cruise control and at times lost power. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1713	MATRIX	2005	6/25/2008	Customer called about his/her 2005 Toyota Corolla Matrix XR. Specifically, customer claims that on an unknown date, the car suddenly accelerated causing him/her to hit the front wall of a home. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1714	SCION tC	2008	6/25/2008	Customer called regarding his 2008 Scion TC. Specifically, Customer claims that on unknown dates, the vehicle accelerated and the brakes wouldn't slow the vehicle down. He was forced to turn the vehicle off immediately to avoid having it lunge forward or to make it stop. Customer further claims that on unknown dates, he braked and the vehicle red-lined. Customer further claims that on an unknown date, he was driving approximately 30 mph and attempted to brake to stop at a stop sign and the engine revved so high that he was unable to stop at the stop sign and was forced to shut off the ignition to stop the vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1715	GS 300	2006	6/27/2008	Customer called regarding his 2006 Lexus GS 300. Specifically, Customer claims that on an unknown date, he pulled out of a parking space, placed the car into drive and when he pushed the gas pedal, it stuck to the floor. Customer further claims he hit the brakes, but the vehicle hit a building. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1716	CAMRY	2008	7/1/2008	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged while in cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1717	IS350	2007	7/1/2008	Customer called regarding his 2007 Lexus IS 350. Specifically, customer claims that on an unknown date, the vehicle accelerated causing damage to the passenger side wheel.
1718	CAMRY	2009	7/2/2008	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates the vehicle surges when accelerating out of a stop. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
1719	SIENNA	2004	7/3/2008	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on July 2, 2008, she was pulling into a parking space when the vehicle lurched forward while the brakes were pressed, causing her to crash through three ceramic pillars and a flower pot. Customer further claims that a teenage boy was injured. A Field Technical Specialist (FTS) inspected the vehicle.
1720	RX 350	2007	7/3/2008	Customer called regarding his 2007 Lexus RX 350. Specifically, customer claims that on June 27, 2008, his vehicle unexpectedly accelerated in his garage, crashing into his house.

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1721	CAMRY	2005	7/8/2008	Customer called regarding her 2005 Toyota Camry. Specifically, the customer claims that on July 2, 2008 the vehicle suddenly unintentionally accelerated, which caused a minor accident in a parking lot. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was in already in motion.
1722	COROLLA	2005	7/9/2008	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on July 2, 2008, the vehicle accelerated very fast on its own and the brake pedal got stuck while she was parked, causing her to run into a house. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1723	CAMRY	2002	7/14/2008	Customer called regarding his 2002 Toyota Camry LE (V6). Specifically, Customer claims that on an unknown date, he put his foot on the brake to shift from park to drive and the vehicle had a sudden acceleration, causing him to run into the garage. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1724	CAMRY	2007	7/15/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he takes his foot off the gas pedal, the car does not slow down. Customer further claims that when he puts his foot on the brake the car slows down, but that after he takes his foot off the brake the car goes back to its former speed. Customer claims that this condition happens three to four times per week. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
1725	AVALON	2007	7/16/2008	Customer called regarding his 2007 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, the customer heard a noise in the brakes and the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1726	CAMRY	2007	7/16/2008	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that there are acceleration problems with his vehicle. The details of any underlying incident(s) are unclear.
1727	CAMRY	2004	7/17/2008	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that on July 17, 2008 the vehicle suddenly unintentionally accelerated, which caused a minor accident in a parking lot. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was in already in motion.
1728	CAMRY	2009	7/18/2008	Customer (car rental company) called regarding a 2009 Toyota Camry. Specifically, customer claims that on an unknown date an unauthorized driver was driving the vehicle when its throttle became stuck open, thereby causing an accident.
1729	TACOMA	2005	7/19/2008	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle jerked forward by itself when coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1730	TACOMA	2008	7/21/2008	Customer called regarding her 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on July 16, 2008 the vehicle accelerated on its own to 60 mph when going over a hill. Customer further claims that she pressed the brakes and that it took 1 mile for the vehicle to stop. Customer further claims that the same thing happened on the same date when her father picked up and drove the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1731	GS 300	2003	7/21/2008	Customer called regarding her 2003 Lexus GS 300. Specifically, Customer claims that on unknown dates, when she slowed down to park or stop, the engine suddenly revved really fast, and if she didn't apply the brake really hard, the car lunged ahead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1732	YARIS	2008	7/22/2008	Customer called regarding his 2008 Toyota Yaris. Specifically, the customer claims that on an unknown date, the vehicle's accelerator became stuck open on full. The customer further claims that she has owned many Toyotas and her experience is congruent with similar reports she has seen on the internet.
1733	RAV 4	2007	7/24/2008	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she was traveling at 55-60 mph and the engine roared going uphill, but then stopped. Customer further claims that on an unknown date while she was driving on the highway, the vehicle accelerated on its own, and she had to engage the emergency brake to stop the vehicle. Customer further claims that on 7/6/08 she was driving in cruise control and the engine revved up and the vehicle also had problems shifting. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1734	SCION tC	2008	7/24/2008	Customer called regarding her 2008 Scion TC. Specifically, Customer claims that on July 3, 2008, her son was driving the vehicle and it started vibrating while he was going approximately 20 mph. Customer further states her son applied the brakes, but the vehicle kept going, causing an accident. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1735	CAMRY	2006	7/25/2008	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he was pulling into a parking space when the vehicle raced forward and hit a brick wall. Customer further claims that similar incidents happened on two other occasions. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1736	COROLLA	2009	7/26/2008	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claimed that on unknown dates the vehicle would lurch out of the parking spot and would not drive faster than idle speed of 5-10 mph. Customer further claims that the check engine light was on.
1737	TACOMA	2008	7/28/2008	Customer called regarding his 2008 Toyota Tacoma Prerunner. Customer claims that on July 16, 2008, his daughter was driving when the vehicle accelerated on its own from 50 to 60 MPH. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1738	RAV 4	2006	7/31/2008	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that on 7/18/08, she backed up the vehicle in a parking lot and the accelerator pedal stuck, causing the vehicle to jolt backwards and causing her to hit two vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1739	TUNDRA	2008	7/31/2008	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that the vehicle does not shift properly and gets stuck in second gear when shifting. Customer further claims that the vehicle will not shift out of park. Customer states that when he drives down hill and accelerates, the vehicle engine's RPMs rev and the vehicle feels as if it has slipped into neutral. A Field Technical Specialist (FTS) inspected the vehicle.
1740	IS-F	2008	8/1/2008	Customer called regarding his 2008 Lexus IS-F. Specifically, customer claims that on an unknown date, his vehicle's gas pedal sticks when he depresses it.
1741	COROLLA	2007	8/4/2008	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated or slowed down on its own without him moving his foot.
1742	COROLLA	2009	8/5/2008	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates the vehicle sped up and the RPM increased when the brakes were pressed.
1743	HIGHLANDER	2008	8/5/2008	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1744	HIGHLANDER	2006	8/9/2008	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that when she presses on the brake pedal, the vehicle lurches forward before braking.
1745	4RUNNER	2007	8/11/2008	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle revved very high while idling. Customer further claims that when this happened and he placed the vehicle in gear, the vehicle lurched.
1746	AVALON	2006	8/11/2008	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on August 7, 2008, while in a parking lot, the vehicle accelerated on its own. Customer claims that the brakes were applied the entire time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1747	CAMRY	2003	8/13/2008	Customer called regarding her 2003 Toyota Camry XLE. Specifically, Customer claims that while her husband was driving up the driveway, he pressed the pedal slightly and the vehicle zoomed through furniture and the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1748	TUNDRA	2007	8/14/2008	Customer called regarding her 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that she was braking but that the vehicle was revved up. Customer further claims that she was able to stop, but that the tires were smoking and the brakes were burning. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1749	HIGHLANDER	2006	8/14/2008	Customer emailed regarding her 2006 Toyota Highlander Hybrid. Specifically, customer claims that when she stops her vehicle, she experiences a forward surge and lurching of the vehicle when it transitions from the battery power to the engine. Customer further claims that she has experienced several incidents of such acceleration. A Field Technical Specialist inspected the vehicle.

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1750	CAMRY	2004	8/15/2008	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that on August 15, 2008 the vehicle suddenly unintentionally accelerated, which caused a minor accident. Customer claims that the acceleration occurred while the vehicle was in already in motion, but that his foot was on the brake.
1751	COROLLA	2007	8/18/2008	Customer's wife called regarding customer's 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle lunged forward and idled high and the RPM were high.
1752	PRIUS	2008	8/19/2008	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on August 17, 2008, her vehicle got stuck in acceleration mode when she was driving on the freeway. Customer further claims that she was driving with cruise control engaged at 75 mph and then accelerated to pass a vehicle when the unintended acceleration happened. Customer further claims she was eventually able to come to a stop by braking against the acceleration. Finally, customer claims that on three different occasions her vehicle would suddenly accelerate when she would shift into drive. Customer claims that the sudden acceleration occurred both while the vehicle was already in motion and while it was at a full stop.
1753	CAMRY	2009	8/21/2008	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on unknown dates the car experiences a hesitation. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
1754	FJ CRUISER	2007	8/22/2008	Customer called about her 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on an unknown series of dates, the car intermittently lunged forward when it is in drive and foot is on brake. Customer further claims that this happens when he/she has his/her foot on the brake pedal and when he/she take his/her foot off the brake.
1755	TUNDRA	2008	8/23/2008	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that when the vehicle slows to a stop, it jerks as if it has been bumped from behind. Customer further claims that this happens during acceleration as well.
1756	CAMRY	2006	8/26/2008	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an August 24, 2008, she was backing into a parking space when the vehicle took off and began spinning, causing her to hit two other vehicles. Customer further claims that her foot was on the brake the entire time, and stopped the vehicle by turning off the engine. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1757	TUNDRA	2007	8/27/2008	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that in August 2008, the emergency lights on the dashboard illuminated and the engine shuttered and bucked.
1758	MATRIX	2005	8/27/2008	Customer called about his/her 2005 Toyota Corolla Matrix XR. Specifically, customer claims that on an unknown date, the car vehicle was experiencing concerns when accelerating.
1759	CAMRY	2007	8/29/2008	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on August 27, 2008, she was traveling on the highway at approximately 65 miles per hour when the vehicle made a noise as if the gears were shifting. Customer further claims that the vehicle began to accelerate to 95 miles per hour on its own. Customer claims that it took her two minutes to slow the vehicle to 65 miles per hour, and that she had both of her feet on the brake pedal. Customer states that the vehicle was shaking and that she was able to pull over and shut the vehicle off. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1760	PRIUS	2007	8/29/2008	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when vehicle was at a complete stop and customer was depressing brake, vehicle surged forward. Customer further claims he felt a shimmy under the hood when braking/coming to a full stop. The FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1761	TACOMA	2007	9/2/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle did not slow down fast enough when he removed his foot from the gas, and continued to go 20 mph on the highway. Customer further claims that the vehicle did not shift to a lower gear when coasting downhill and that the vehicle sometimes lurched forward when he removed his foot from the brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1762	CAMRY	2009	9/2/2008	Customer called regarding his 2009 Toyota Camry CE. Specifically, customer claims that on various unknown dates the vehicle hesitates and is bucking when decelerating downhill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1763	ES 330	2004	9/4/2008	Insurer called on behalf of customer called regarding his 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, his vehicle had unintended acceleration, causing him to hit a building.
1764	4RUNNER	2007	9/5/2008	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates when the air conditioner was turned on, the engine's RPMs increased and decreased. Customer further claims that when the engine cycled on, its RPMs increased from 200 to 300. Customer claims that because of this, it took a lot of effort to hold the car back when it was stopped. Customer states that there was a lot of clunking and jerking when he drove the vehicle and that it attempted to lurch ahead when it cycled on. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1765	HIGHLANDER	2005	9/5/2008	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that his is experiencing intermittent acceleration surge with his vehicle. Customer further claims that these acceleration surges occur both when he accelerates from a stop and from a low speed.
1766	SIENNA	2006	9/8/2008	Customer called about his/her 2006 Toyota Camry Sienna CE. Specifically, customer claims that on an unknown date, the car's accelerator was stuck.
1767	CAMRY	2004	9/8/2008	Customer called regarding his 2004 Toyota Camry. Specifically, the customer claims that, on an unknown date, he was reversing the vehicle when it lunged forward. The customer further claims the vehicle hit a curb and that the vehicle's alignment and steering column were damaged as a result of the incident. The customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1768	4RUNNER	2007	9/9/2008	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that in September 2008 his wife was driving the vehicle on the freeway when she attempted to pass another vehicle by accelerating. Customer claims that the vehicle then suddenly accelerated into full throttle. Customer claims that in order to stop the vehicle, his wife had to apply the brake for approximately one quarter of a mile. Customer also claims that the engine was revving during this time. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1769	4RUNNER	2005	9/11/2008	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates he had a recurring acceleration concern with his vehicle. Customer further claims that in one instance, he was moving the vehicle in reverse when the vehicle accelerated, but that he was able to control the vehicle by pressing on the brake. Customer states that he had to turn off the vehicle's engine. Customer feels that floor mats were the cause of the sudden acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1770	SIENNA	2006	9/11/2008	Customer called regarding his 2006 Toyota Sienna. Specifically, the customer claims that on September 10, 2008, the vehicle was involved in a minor accident and he feels the cruise control was involved. The customer further claims that the accident occurred when the vehicle accelerated while stopped in traffic. The customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1771	FJ CRUISER	2007	9/13/2008	Customer called about his 2007 Toyota FJ Cruiser SR5. Specifically, customer claims that on several unknown dates, the car will not go when he presses gas, then it will take off. Customer claims the sudden acceleration happened while the vehicle was at a full stop.
1772	TUNDRA	2006	9/15/2008	Customer called regarding his 2006 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates, his vehicle will lunge forward while coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1773	PRIUS	2008	9/15/2008	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on September 4, 2008, the transmission revved up as she was driving up a hill, turning into a driveway. Customer claims the vehicle did not respond to pressing on the brakes, and the vehicle hit a brick wall and was damaged. Customer further claims the airbags did not deploy. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1774	RX 330	2005	9/16/2008	Customer claims that the vehicle jerks and hesitates upon hard acceleration. Engine control system inspected with Techstream for malfunctions; none found. Vehicle test driven and confirmed that vehicle operates as designed. Update performed per TSIB TC005-03.
1775	TUNDRA	2007	9/19/2008	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that once the car is put in drive, it makes an intermittent ticking noise. Customer further claims that when the vehicle slows to 30 miles per hour, it will downshift. Customer claims that when he gives the vehicle gas, it will jerk.

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1776	PRIUS	2008	9/22/2008	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1777	FJ CRUISER	2008	9/22/2008	Customer called about his 2008 Toyota FJ Cruiser SR5. Specifically, customer claims that on unknown dates, the car idled very rough and when shifting from neutral to drive the car accelerated on its own.
1778	CAMRY SOLARA SE	2004	9/23/2008	Customer called regarding her 2004 Toyota Camry Solara SE (V6). Specifically, Customer claims that on an unknown date, she pulled into a parking space, placed her foot on the brake, and her vehicle lunged forward, causing the vehicle to go through a glass window and brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1779	GS 300	2006	9/23/2008	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on unknown dates, his vehicle has surged, especially when slowing down or stopped. A FTS inspected the vehicle.
1780	SCION TC	2005	9/23/2008	Customer called regarding her 2005 Scion TC. Specifically, customer claims that on unknown dates, her vehicle jumped forward when the vehicle would stop and then accelerate.
1781	TUNDRA	2007	9/24/2008	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when he tries to slow down and speed up, the vehicle makes a jerking motion and surges forward after a delay. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
1782	COROLLA	2009	9/24/2008	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on September 15, 2008 the vehicle accelerated unintentionally when she was pulling up to her driveway at 5 mph. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1783	ES 350	2008	9/24/2008	Customer called about her 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, when she was turning to park the vehicle jumped a curb and hit her house. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
1784	AVALON	2008	9/25/2008	Customer called regarding her 2008 Toyota Avalon Limited. Specifically, customer claims that on September 10, 2008, while driving on the New Jersey Turnpike, the vehicle accelerated on its own. Customer claims that the vehicle eventually, stopped without incident. A Field Technical Specialist reported that they were unable to find anything wrong the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1785	TUNDRA	2007	9/26/2008	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle leaps forward when he applies the brakes. Customer further claims that the drive line is leaking and that he can hear the gears making sounds when the vehicle slows down.
1786	HIGHLANDER	2005	9/26/2008	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that his vehicle accelerates too rapidly from a full stop: when the customer presses the gas, the vehicle will lurch forward.
1787	CAMRY	2003	9/26/2008	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on September 26, 2008, her vehicle gunned when she put her foot on the brake as she was pulling into a parking spot, causing her to run over the curb and hit a truck. Customer further claims that at the time of the accident she had her foot on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1788	AVALON	2007	9/30/2008	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while traveling at approximately 40 mph, the vehicle accelerated to about 100 mph. Customer claims that she applied the emergency brake. FTS has been involved and it was advised it could have been the floor mat that caused the vehicle to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1789	RX 330	2006	10/2/2008	Customer called regarding his 2006 Lexus RX 330. Specifically, customer claims that on unknown dates, his vehicle has accelerated unexpectedly, causing small accidents and slight dings in the bumper. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1790	CAMRY	2007	10/8/2008	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and jumped a curb. The Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1791	CAMRY	2007	10/9/2008	Customer called regarding his 2007 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle gave too much power without stepping on the gas pedal. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1792	CAMRY	2007	10/10/2008	Customer called regarding his 2007 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle lagged and then lurched forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1793	CAMRY	2005	10/10/2008	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date she was pulling into a parking space with her foot off the accelerator when the vehicle suddenly accelerated.
1794	RAV 4	2008	10/13/2008	Customer's husband called regarding their 2008 Toyota RAV4. Specifically, customer claims that on October 12, 2008 he was pulling out of a car wash when the vehicle suddenly accelerated and collided with another vehicle. A Field Technical Specialist (FTS) inspected the vehicle.
1795	TUNDRA	2007	10/13/2008	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle has power surges. Customer further claims that when stepping on the gas pedal, the vehicle takes off.
1796	CAMRY	2009	10/13/2008	Customer called regarding his 2009 Toyota Camry SE. Specifically, customer claims that on various unknown dates the engine, when the vehicle is stopped, revs so high that the vehicle will move forward unless he holds down the brake tightly. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
1797	GS 350	2007	10/13/2008	Customer called regarding his 2007 Lexus GS 350. Specifically, customer claims that on an unknown date, his vehicle has accelerated unexpectedly directly after shifting from park into reverse. He nearly struck his neighbor. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1798	YARIS	2008	10/16/2008	Customer called regarding his 2008 Toyota Yaris. Specifically, the customer claims that, on October 15, 2008, he was in an accident at 10am in the morning. Customer claims that he ent through a car wash and that vehicle was in Nuetral gear, when the vehicle changed to second gear without him pressing the gas pedal. Customer further claims that the vehicle made a sudden acceleration. Customer further claims that he took control of the wheel and made a right turn and a left turn hitting a fence. FTS inspected the vehicle. Customer claims that this sudden acceleration took place while the vehicle was at a full stop.
1799	COROLLA	2005	10/16/2008	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on October 15, 2008, the vehicle accelerated out of control to 25 mph when she was parking the vehicle in a parking lot at around 10 mph, causing her to run into a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1800	COROLLA	2006	10/17/2008	Customer called regarding his 2006 Toyota Corolla LE. Customer claims that on August 16, 2006 the vehicle's brakes failed to stop acceleration. Customer furthers claims this lead to a collision with the car in front of him, damaging the vehicle. Customer claims that the sudden acceleration occured while the vehicle was already in motion.
1801	HIGHLANDER	2004	10/20/2008	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that he and his wife have experienced three incidents of the gas pedal sticking and not releasing.
1802	CAMRY	2003	10/20/2008	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates, her vehicle has lurched forward while either stopped at a red light (first incident) or decelerating into a garage (second incident). During the second incident the car slammed into a refridgerator. A FTS inspected the vehicle.
1803	TACOMA	2006	10/20/2008	Customer called regarding her 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on October 17, 2008 the vehicle accelerated while her son was driving on a mountain. Customer further claims that the vehicle's brakes or steering did not respond, and that her son jumped out of the moving vehicle because he was afraid the vehicle would go over the cliff. Customer further claims that the vehicle's wheels turned and the vehicle stopped, and that upon restarting the vehicle the engine revved hard and high. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.

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1804	RAV 4	2007	10/22/2008	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that his wife was driving the vehicle on the highway, and the accelerator pedal stuck. Customer claims that the sudden acceleration occurred while the car was already in motion.
1805	GS 350	2008	10/23/2008	Customer claims that the vehicle surges forward when stopped. Customer further claims that this problem has happened four (4) times to him and once to his wife. Vehicle was test driven and the condition did not present itself. A DTC check was performed, and no DTCs were present.
1806	RX 350	2008	10/23/2008	Customer claims that when slowing down to go through a yield sign and then reaccelerates, the vehicle hesitates, jerks, and slams into gear. Vehicle was test driven and normal operation observed.
1807	ES350	2008	10/23/2008	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date his wife was in an accident while she was pulling into a parking space. Customer claims that that the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1808	GX 470	2008	10/24/2008	Customer called regarding his 2008 Lexus GX 470. Specifically, customer claims that on unknown dates, his vehicle has idled highly and tried to move forward as he pressed the brake.
1809	TACOMA	2008	10/27/2008	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that when coming to a stop or downshifting, the vehicle will suddenly surge or accelerate. Customer further claims that that the vehicle sometimes jumps up several RPMs. Customer claims that sudden acceleration occurs while vehicle is already in motion.
1810	CAMRY	2007	10/28/2008	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle jumped forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1811	PRIUS	2005	10/29/2008	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1812	TACOMA	2007	10/29/2008	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle does not have much traction, and that when the vehicle is at a stop light it lunges forward. Customer claims that sudden acceleration occurs when the vehicle is at a full stop.
1813	CAMRY	2008	10/30/2008	Customer called regarding his 2008 Toyota Camry XLE (V6) Specifically, customer claims that on October 29, 2008, the vehicle surged and hit another vehicle. The Field Technical Specialist (FTS) inspected vehicle on November 11, 2008. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1814	COROLLA	2009	10/30/2008	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle would hesitate when going from reverse into drive and jerked hard when going into gear. Customer further claims that the vehicle was idling high when she was not touching the gas pedal.
1815	RX 400h	2006	10/31/2008	Customer called regarding his 2006 Lexus RX 400h. Specifically, customer claims that on unknown dates, he has experienced sudden acceleration.
1816	TACOMA	2006	10/31/2008	Customer emailed regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle lurched forward at stops, even with the brakes applied. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1817	TACOMA	2007	11/1/2008	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle did not slow down fast enough when he removed his foot from the gas, and continued to go 20 mph on the highway. Customer further claims that the vehicle did not shift to a lower gear when coasting downhill and that the vehicle sometimes lurched forward when he removed his foot from the brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1818	PRIUS	2001	11/3/2008	Customer called regarding his 2001 Toyota Prius 4-Door Hybrid. Specifically, customer claims that the gas pedal gets stuck. But he makes no claim that this results in unintended acceleration. Potentially unresponsive.
1819	ES 330	2004	11/3/2008	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, her vehicle took off after putting it into reverse and tapping the gas. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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1820	CAMRY	2007	11/3/2008	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date the vehicle accelerated in reverse and he was unable to control the vehicle. The Field Technical Specialist (FTS) did not inspect vehicle, because customer traded the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1821	ES 350	2008	11/4/2008	Customer claims that the transmission jerked while driving in stop and go traffic. The vehicle was test-driven with Techstream and the transaxle downshifted hard from third to second gear when using moderate throttle, and it was easier to duplicate with the transaxle temperature below about 100 degrees F. The vehicle was compared with another 2008 ES 350 with 10,583 mi and it felt the same as the customer's vehicle.
1822	TACOMA	2004	11/4/2008	Customer called regarding her 2004 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date, her vehicle moved forward while applying brakes.
1823	RAV 4	2007	11/4/2008	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on three unknown dates, his vehicle surged when stopped. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1824	CELICA GT	2003	11/4/2008	Customer called regarding her 2003 Toyota Celica GT. Specifically, customer claims that on unknown dates, her vehicle has accelerated on its own and would not stop.
1825	IS250	2007	11/5/2008	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on the Friday prior to November 5, 2008, the vehicle experienced unintended acceleration and sped up to 80 mph. Customer claims that that his wife tried to apply the brakes but they did not work.
1826	LS 460	2007	11/6/2008	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on an unknown date in November of 2008, his vehicle sounded as if it was about to surge as he was stopped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1827	CAMRY	2007	11/6/2008	Customer called regarding her 2007 Toyota Camry LE (V6). Specifically, customer claims that on November 1, 2008, her vehicle accelerated quickly on its own when she was leaving a parking lot and making a right hand turn at a slow speed, causing her vehicle to jump a curb and collide with a lightpole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1828	TACOMA	2005	11/6/2008	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle idled at 1500 RPM, and the vehicle's RPM jumped up by 500 or 600 when shifting.
1829	TACOMA	2009	11/6/2008	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle seemed to be in neutral then took off when he took his foot off of the gas pedal. An FTS inspected the vehicle.
1830	AVALON	2005	11/6/2008	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on October 17, 2008 the vehicle surged and clipped another driver in the front before stopping approximately 100 yards down the road. Customer further claims that the vehicle continued to surge after she applied the brakes. Customer further claims that on unknown dates the vehicle accelerated on its own three or four times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1831	TACOMA	2006	11/7/2008	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on September 8, 2008 the vehicle accelerated and ran into his garage before he cut off the engine. Customer further claims that he applied the brakes with no success. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1832	TACOMA	2008	11/10/2008	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that when coming to a stop or downshifting, the vehicle will suddenly surge or accelerate. Customer further claims that that the vehicle sometimes jumps up several RPMs. Customer claims that sudden acceleration occurs while vehicle is already in motion.
1833	4RUNNER	2007	11/12/2008	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that while driving down the street he was not able to control his acceleration and that he was unable to brake. Customer further claims that he tried to shut the vehicle off but he could not. Customer claims that he then heard a loud noise and that his vehicle started smoking. Customer claims that sudden acceleration occurred while the vehicle was already in motion.

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1834	4RUNNER	2008	11/13/2008	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that in September 2008, the vehicle accelerated on its own, going from a speed of 70 miels per hour to a speed of 90 miles per hour. Customer claims that he had to ride the brakes in order to stop the vehicle. Customer further claims that on October 11, 2008, the same problem occurred again. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the udden acceleration occurred while the vehicle was already in motion.
1835	COROLLA	2009	11/18/2008	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date he was pulling into a parking space when the vehicle jerked and raced, then went up a slope and hit a boulder. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1836	LS 400	2000	11/19/2008	Customer called regarding his 2000 Lexus LS 400. Specifically, customer claims that on an unknown date, his vehicle lurched forward when he put his foot on the brake as he was pulling into a parking spot, causing him to run into a pole and damage his driver side fender. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1837	CAMRY	2004	11/19/2008	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that in February of 2009 the vehicle suddenly "took off." The customer further claims that this caused a minor accident. Customer claims that the acceleration occurred while the vehicle was in already in motion.
1838	COROLLA	2008	11/21/2008	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on November 10, 2008, she was preparing to enter a parking garage and placed her foot on the brake, when the vehicle lunged forward and crashed through the gate. Customer further claims that she believes the gas pedal was stuck. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1839	COROLLA	2008	11/24/2008	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on an unknown date, she was sitting at a stop light when the vehicle attempted to accelerate. Customer further claims that she experiences jerking when she attempts to drive in reverse. Customer also states that when she has her foot on the throttle, the vehicle will accelerate faster than normal.
1840	SIENNA	2004	11/24/2008	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on an unknown date she was operating the vehicle when the gas pedal became stuck and that she had to force the vehicle into park to stop it.
1841	COROLLA	2009	11/26/2008	Customer emailed regarding his 2009 Toyota Corolla S. Specifically, customer claims that on unknown dates the vehicle's RPM stayed over 3000 when shifting out of 5th gear.
1842	PRIUS	2006	11/26/2008	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle slips and jerks. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1843	TACOMA	2008	11/26/2008	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that when coming to a stop or downshifting, the vehicle will suddenly surge or accelerate. Customer further claims that that the vehicle sometimes jumps up several RPMs. Customer claims that sudden acceleration occurs while vehicle is already in motion.
1844	4RUNNER	2006	12/1/2008	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that on November 27, 2008, the vehicle was totaled when the vehicle moved forward on its own, causing an accident. A Field Technical Specialist (FTS) inspected the vehicle.
1845	CAMRY SOLARA	2008	12/1/2008	Customer called regarding her 2008 Toyota Camry Solara SE (V6). Specifically, customer claims that on unknown dates, vehicle jumped, bucked & accelerated too fast. Customer further claims that floats in the gas tank caused inaccurate fuel reading, and that she felt a pop when making a sharp turn.
1846	CAMRY	2008	12/3/2008	Customer called regarding his 2008 Toyota Camry LE (V6). Specifically, customer claims that on an unknown date the vehicle jerked. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1847	GX 470	2004	12/5/2008	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on an unknown date, her vehicle lunged forward as she parked in her driveway, causing her to hit her house. Then, as the tow truck loaded the vehicle, it lunged again, further damaging the vehicle. A FTS inspected the vehicle.
1848	CAMRY	2007	12/8/2008	Customer call regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle lurched forward. Customer further claims that shifting down and up when coasting down a hill at speeds of 35-43 mph. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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1849	MATRIX	2009	12/8/2008	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates the vehicle jumped when the gas pedal was pressed slightly.
1850	CAMRY	2005	12/9/2008	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 26, 2008, she was driving slowly into a parking lot when the vehicle suddenly accelerated, causing her to hit a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1851	CAMRY	2007	12/11/2008	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically, customer claims that on 12/8/08 the vehicle surged ahead. Customer further claims that she could not control the vehicle and drove into an embankment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1852	PRIUS	2007	12/12/2008	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1853	IS350	2006	12/16/2008	Customer called regarding her 2006 Lexus IS 350. Specifically, customer claims that on an unknown date, while his wife was pulling into a parking lot, she put the vehicle in drive and the vehicle revved up, causing her to hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1854	TACOMA	2006	12/18/2008	Customer called in regarding a 2006 Toyota Tacoma. The customer claims the vehicle unintentionally accelerated on 12/18/2008. FTS did not inspect the vehicle. The customer claims the vehicle was revving and attempting to accelerate while his foot was on the brake and he was stopped.
1855	ES350	2008	12/22/2008	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle's motor constantly rushed the vehicle forward, and that he was almost in two accidents.
1856	CAMRY SOLARA SLE	2004	12/22/2008	Customer called regarding his 2004 Toyota Camry Solara SLE. Specifically, customer claims that on either December 10, 2008 or December 17, 2008, his wife was driving the vehicle into the driveway when it accelerated into the house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1857	TACOMA	2005	12/22/2008	Customer called in regarding a 2005 Toyota Tacoma. The customer claims that on 12/20/2008 the vehicle unintentionally accelerated and almost caused an accident. The customer further claims that the vehicle had accelerated unintentionally a number of times. FTS did not inspect the vehicle due to the fact that the customer repeatedly avoided the inspection. The customer claims that the revving occurred while the vehicle was completely stopped.
1858	TACOMA	2008	12/22/2008	Customer called regarding his 2008 Toyota Tacoma Prerunner. Customer calims that on December 22, 2008, he stopped at a light when the vehicle accelerated by itself, rear-ending another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1859	CAMRY	2002	12/29/2008	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on December 26, 2008, his vehicle accelerated as he depressed the brake, almost causing an accident. Customer further states that this incident occurred twice before. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1860	HIGHLANDER	2008	12/30/2008	Customer called regarding his 2008 Toyota Highlander. Specifically, customer claims that on unknown dates the engine revved and was slow, and there was a lag when he tried to accelerate.
1861	CAMRY	2003	1/5/2009	Customer called regarding her 2003 Toyota Camry LE. Customer claims that on January 4, 2009 her car surged forward while she attempted to pull into a church parking lot. Customer further claims that the vehicle ran over a parking sign and jumped the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1862	SIENNA	2004	1/5/2009	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on unknown dates her vehicle hesitated and then took off when she lightly touched the gas pedal.
1863	TUNDRA	2007	1/5/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the vehicle jumps too much when the vehicle is being driven over 50 miles per hour on the highway.
1864	COROLLA	2007	1/5/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle surged in reverse when her foot was on the brake. Customer further claims that this has happened three times.

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1865	AVALON	2008	1/6/2009	Customer emailed regarding her 2008 Toyota Avalon. Specifically, customer claims that on January 2, 2009, she was stopped in traffic and released her foot from the brake, and before she touched the accelerator, the vehicle lunged forward and hit another vehicle. Customer further claims that on other unknown dates the car has lunged forward and seemed to have an engine surge that she could not stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1866	PRIUS	2006	1/7/2009	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1867	CAMRY	2004	1/7/2009	Customer called regarding her 2004 Toyota Camry. Specifically, the customer claims that on January 4, 2009 the vehicle suddenly lunged forward. The customer further claims the vehicle has lunged on a number of occasions. Customer claims that the acceleration occurred while the vehicle was in already in motion.
1868	COROLLA	2009	1/8/2009	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates the vehicle's engine revved high and the RPM rate was too high while traveling at highway speeds.
1869	AVALON	2008	1/8/2009	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on January 8, 2009, he was backing out of his garage, then stopped the vehicle and shifted into drive. The vehicle lunged forward and smashed into the garage, and kept lurching when he stepped on the brakes. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1870	CAMRY	2009	1/8/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on various unknown dates the vehicle pauses when accelerating. When traveling uphill the vehicle will lunge and begin to bounce. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1871	CAMRY	2003	1/10/2009	Customer called regarding his 2003 Toyota Camry LE. Customer claims that while his wife dropped his daughter off at school on an unknown date, the vehicle surged forward. Customer further claims the brakes failed to stop the acceleration. Customer further claims the car jumped the curb and crashed into the building.
1872	MATRIX	2007	1/12/2009	Customer called about his 2007 Toyota Corolla Matrix XR. Specifically, customer claims that on several unknown dates, the car varied in speed tremendously and the car did not perform normal engine deceleration. Customer claims the acceleration happened while the vehicle was already in motion.
1873	ES 330	2005	1/12/2009	Customer called regarding her 2005 Lexus ES 330. Customer claims that on January 8, 2009 her vehicle's gas pedal got stuck causing her to accelerate and have an accident. Customer further claims that she struck a tree. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1874	RX 330	2005	1/14/2009	Customer's insurance representative called regarding her 2005 Lexus RX 330. Customer claims the vehicle suffered from unwanted acceleration on an unknown date.
1875	CAMRY	2009	1/15/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while easing his foot off the brake pedal, the vehicle accelerated too much. Customer further claims that the torque or idle should be adjusted, and that when he drove in reverse the vehicle accelerated too much.
1876	CAMRY	2003	1/15/2009	Customer called regarding his 2003 Toyota Camry LE. Customer claims that while his wife dropped his daughter off at school on an unknown date, the vehicle surged forward. Customer further claims the brakes failed to stop the acceleration. Customer further claims the car then struck the school.
1877	ES350	2007	1/20/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, while his wife was driving the vehicle accelerated on its own up to 60 miles per hour and the vehicle would not brake. Customer further claims that his wife had to almost stand up on brakes for vehicle to stop.
1878	TUNDRA	2006	1/20/2009	Customer called regarding his 2006 Toyota Tundra SR5. Customer claims that on January 17, 2008 his vehicle surged forward when he attempted to put the vehicle into park. The customer further claims that the vehicle went over the curb, hit a post and wall, and cracked all the windows in an office. Customer claims this sudden acceleration occurred while the vehicle was stopped.
1879	TUNDRA	2007	1/20/2009	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that vehicle lunges forward when it is shifted into drive. Customer further claims that vehicle kicks while driving.

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1880	CAMRY	2003	1/21/2009	Customer called regarding his 2003 Toyota Camry XLE. Customer claims that on January 21, 2009 while parked in a garage his vehicle surged forward when he put it into gear. Customer further claims the vehicle clipped the house next door and vehicle. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was at a stop.
1881	CAMRY	2008	1/27/2009	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that while driving the vehicle accelerates on its own.
1882	TUNDRA	2008	1/27/2009	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that she experiences vibration and bouncing when the vehicle is driven between 55 and 65 miles per hour. Customer further claims that the vehicle surges too strongly and too late after the accelerator is pressed.
1883	AVALON	2009	1/27/2009	Customer called regarding his 2009 Toyota Avalon XL. Specifically, customer claims that while accelerating, the engine continues to rev after releasing the accelerator. Customer claims that on one occasion, had the had to turn the vehicle off to stop eng revving. Customer claims that he experienced this incident on more than one occasion. Dealer investigated the condition. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1884	CAMRY	2007	1/27/2009	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle lunged and jumped gears. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1885	SIENNA	2007	1/28/2009	Customer called regarding his 2007 Toyota Sienna. Specifically, the customer claims that on December 24, 2008 the vehicle suddenly accelerated while executing a U-turn. The customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1886	CAMRY SOLARA SE	2002	1/29/2009	Customer called regarding her 2002 Toyota Camry Solara SE. Specifically, customer claims that on an unknown date, she was backing into her neighbor's driveway and when she put the vehicle in reverse, it flew across the road. Customer further claims that she then put the vehicle in drive and it flew across the road again.
1887	COROLLA	2008	1/29/2009	Customer called regarding his 2008 Toyota Corolla. Specifically, customer claims that on an unknown date, he was pulling out of a parking space and had turned his steering wheel to the left when the vehicle accelerated. Customer further claims that he pressed on the brake pedal five times before the vehicle stopped.
1888	GS 430	2002	1/29/2009	Customer called regarding her 2002 Lexus GS 430. Specifically, customer claims that on an unknown date her vehicle lunged out of a car wash and accelerated suddenly. Customer further claims that she struck a light pole and a fast food order box. A Field Technical Specialist (FTS) inspected the vehicle.
1889	TACOMA	2006	1/29/2009	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle experienced intermittent instances of the rpm increasing and the vehicle does not actually accelerate. Customer further claims that on one occasion he was driving at 2 mph and the engine went up to 2000 rpm. Customer further claims that on another occasion he was driving at 60 mph and the vehicle's engine went up to 5500 rpm. Customer further claims that he had to put the vehicle in neutral to lower the rpm. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1890	TUNDRA	2007	1/30/2009	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle pushed forward when he braked.
1891	IS250	2007	1/30/2009	Customer called regarding 2007 Lexus IS 250. Specifically, customer claims that for one year he experienced some concerns. Customer claims that that the vehicle jumps from 4 or 5 rpms even when braking and vehicle feels like it is jerking, but it does not actually move forward.
1892	COROLLA	2008	1/31/2009	Customer caller regarding her 2008 Toyota Corolla CE. Customer claims that on November 19, 2008, while backing out of a parking space, she shifted into reverse and the vehicle shot backward, even though the brake was still applied. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1893	ES 330	2006	2/2/2009	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on an unknown date, she removed her foot from the gas pedal but the vehicle accelerated, causing her to hit a pole. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1894	PRIUS	2005	2/2/2009	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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1895	LX 470	2006	2/2/2009	Insurance broker called on behalf of customer regarding her 2006 Lexus LX470. Customer claims that on an unknown date, while stopped, her vehicle made a roaring sound and lurched forward. Customer further claims the car struck a pole before stopping. Customer claims that this sudden acceleration occurred while the vehicle was at a stop.
1896	TUNDRA	2007	2/3/2009	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle's throttle stuck when he was driving on a back road. Customer further claims that the vehicle still accelerated when he pressed the brakes. Customer further claims that the only way to stop the vehicle was to shut off the ignition. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1897	CAMRY	2006	2/3/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates when he stepped on the gas pedal, the vehicle jerked.
1898	MATRIX	2008	2/4/2009	Customer called about his 2008 Toyota Corolla Matrix STD. Specifically, customer claims that on an unknown date, the car suddenly accelerated causing him to crash into his own garage. Customer further claims that the same issue occurred when his wife was driving on two separate occasions.
1899	CAMRY	2002	2/5/2009	Customer called regarding his 2002 Toyota Camry LE. Customer claims that while his wife was driving the vehicle, it accelerated rapidly upon entering a store parking lot. Customer further claims that the vehicle struck a beauty supply store at 50mph. Customer further claims that this was the 2d time the car accelerated on its own. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1900	TACOMA	2003	2/5/2009	Customer called regarding his 2003 Toyota Tacoma. Specifically, the customer claims that on February 5, 2009 he was in a minor accident when the accelerator stuck. FTS inspected the vehicle. The customer further claims the vehicle was already in motion at the time of the acceleration.
1901	AVALON	2008	2/9/2009	Customer called regarding 2008 Toyota Avalon XL. Specifically, customer claims that on January 30, 2009, while driving the brake pedal would not work. A Field Technical Specialist inspected the vehicle, and repaired the accelerator sensor.
1902	GX 470	2006	2/9/2009	Customer called regarding her 2006 Lexus GX 470. Customer claims that on an unknown date, the gas pedal on the vehicle got stuck and the vehicle lurched forward. Customer further claims that on February 5, 2009 the vehicle again accelerated on its own. Customer further claims the vehicle rear ended her mother's truck, causing damage. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1903	ES350	2007	2/10/2009	Customer called about his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, the car suddenly accelerated. Customer further claims that it took 1.5 miles of hard braking to stop the vehicle. An FTS inspected the vehicle. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
1904	IS250	2007	2/10/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, while driving on the highway, the vehicle accelerated unintentionally. Customer claims that the sudden unintended acceleration occurred while the vehicle was already in motion.
1905	RAV 4	2008	2/10/2009	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on February 8, 2008 he was reversing his vehicle into his garage when the vehicle would not stop and hit an air conditioning unit. A Field Technical Specialist (FTS) inspected the vehicle.
1906	HIGHLANDER	2006	2/11/2009	Customer called regarding her 2006 Toyota Highlander LTD. Customer claims that on an unknown series of dates her vehicle accelerated before slowing down while pressing the brakes. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
1907	IS-F	2008	2/12/2009	Customer called regarding his 2008 Lexus IS-F. Customer claims that on an unknown date his vehicle engaged in unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1908	FJ CRUISER	2008	2/12/2009	Customer called about his/her 2008 FJ Cruiser SR5. Specifically, customer claims that on an unknown date, the car intermittently lurched forward. Customer claims the sudden acceleration happened while the vehicle was at a full stop.

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1909	PRIUS	2007	2/17/2009	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on February 5, 2009, while turning to pull into a parking space, the vehicle jumped forward and hit a pole supporting six ft chain link fence and vehicle proceeded over wall/embankment; nose of vehicle hit the ground on other side of fence, while the rear of the vehicle was on other side of wall/lodged on fence above. Customer further claims that vehicle would not stop and had foot on brake. Customer further claims there were witnesses and photos taken, and one witness hear gas engine still running while vehicle was pivoting up on top of fence/wall. Customer further claims car was totaled. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1910	ES350	2007	2/18/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, there was an incident. Dealer and a Field Technical Specialist inspected the vehicle and found the vehicle operated as designed.
1911	IS250	2006	2/19/2009	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on unknown dates, the engine idle is hard at a stop lights. Customer further claims that the transmission is jerky.
1912	TACOMA	2008	2/19/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, the customer claims that, on an unknown date, the vehicle will idle high and rev when the engine is cold. The customer further claims the revs cause sudden acceleration. FTS did inspect the vehicle. The customer claims the sudden acceleration occurred while the vehicle was already in motion and at a full stop.
1913	CAMRY	2009	2/19/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicles acceleration pedal has about a half-inch give, then the vehicle suddenly accelerates. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
1914	TACOMA	2008	2/19/2009	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that in the morning when the car is cold, it runs at an excessive RPM rate and that customer experiences strong forward thrust when the vehicle goes into gear. Customer claims that the sudden acceleration occurs when the vehicle is at a full stop.
1915	RAV 4	2008	2/20/2009	Customer called regarding his 2008 Toyota Rav 4. Specifically, customer claims that on February 16, 2009, he stopped to merge and his vehicle lurched forward into traffic. An FTS inspected the vehicle.
1916	PRIUS	2009	2/23/2009	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
1917	COROLLA	2009	2/24/2009	Customer emailed regarding his 2009 Toyota Corolla S. Specifically, customer claims that on an unknown date the vehicle's accelerator got stuck at a high acceleration speed after he rocked the vehicle back and forth in order to back out of a parking space in the snow, causing him to almost run into another parked vehicle. Customer further claims that on an unknown date the vehicle's accelerator got stuck again upon turning on the ignition while in park. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1918	TUNDRA	2006	2/24/2009	Customer called regarding her 2006 Toyota Tundra. Customer claims that on an unknown series of dates the vehicle moves forward while coming to a stop. Customer claims this sudden acceleration occurred while the vehicle is already in motion.
1919	CAMRY	2006	2/24/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date she was backing into her driveway when the gas pedal got stuck, causing her to crash into a snowbank in front of her home. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1920	COROLLA	2005	2/25/2009	Customer called about her 2005 Toyota Corolla LE. Specifically, customer claims that on an unknown date, the car lurched forward and the steering wheel has locked when in reverse. Customer claims the lurching happened while the vehicle was already in motion.
1921	HIGHLANDER	2006	2/26/2009	Customer called regarding her 2006 Toyota Highlander. Customer claims that on an unknown series of days, the vehicle lunged forward when trying to brake. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
1922	HIGHLANDER	2007	2/27/2009	Customer called regarding her 2007 Toyota Highlander. Specifically, customer claims that her vehicle surges forward when she drives and does not apply the brakes.
1923	CAMRY	2006	2/27/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on February 27, 2009, he was at a stop sign with his foot on the brake when the vehicle suddenly accelerated on its own and hit the vehicle in front of him. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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1924	CAMRY SOLARA	2007	3/2/2009	Customer called regarding his 2007 Toyota Camry Solara SLE (V6). Specifically, customer claims that on February 28, 2009, while making a left turn and proceeding through a stoplight, the vehicle's rpms jumped, the engine was racing, and he hit another vehicle and had to use the curb to slow the vehicle down. Customer further claims that after the vehicle came to a halt, she started the vehicle again and the rpms revved and vehicle unintentionally accelerated. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1925	CAMRY	2006	3/3/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on February 27, 2009, she was backing into the her garage when the vehicle sped up and hit a brick wall, then lunged forward and hit her neighbor's garage door. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1926	CAMRY	2003	3/5/2009	Customer called regarding her 2003 Toyota Camry LE. Customer claims that on March 5, 2009 her vehicle surged forward while her foot was on the brake. Customer claims this sudden acceleration occurred while the vehicle was at a complete stop.
1927	LS 460	2007	3/9/2009	Customer called regarding his 2007 Lexus LS 460. Specifically, on unknwn dates, customer claims that on three different occasions his vehicle accelerated when he had his foot on the brake.
1928	TUNDRA	2007	3/13/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that the engine revs high. Customer further claims that the ABS locks in snowy conditions.
1929	TUNDRA	2007	3/13/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when she comes to a stop, the vehicle does not seem to finish downshifting. Customer further claims that sometimes the vehicle can jump forward. Customer states that this has been happening for four to six months. Customer further claims that when she had her foot on the brake pedal, the transmission clunked.
1930	MATRIX	2009	3/16/2009	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates when her husband tried to accelerate when the vehicle was hot, the vehicle started to jerk and the RPM went higher. Customer further claims that the transmission started slipping. Customer further claims that her husband has almost been involved in a couple of accidents. A Field Technical Specialist failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1931	TACOMA	2008	3/16/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle had a vibration at high speeds, and lunged and took off at a stop light.
1932	LS 460	2008	3/16/2009	Customer called regarding his 2008 Lexus LS 460. Specifically, customer claims that on an unknown date his vehicle idles too fast. Customer further claims that on February 17, 2009, customer was travelling at 20 miles per hour and took his foot off the gas, yet the vehicle continued to travel at 20 miles per hour for 40 blocks.
1933	RAV 4	2005	3/18/2009	Customer called regarding her 2005 Toyota RAV4. Specifically, customer claims that on March 15, 2009 the vehicle started to slide and she lost control while pulling out of a parking lot with her foot on the brake.
1934	TUNDRA	2007	3/18/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when he is coming to a complete stop and removes his foot from the brake pedal, he hears a clunking soon and feels the vehicle jerk forward. Customer claims that sudden acceleration occurs while the vehicle is at a full stop.
1935	HIGHLANDER	2006	3/19/2009	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that on March 16, 2009 the vehicle accelerated like an airplane and took off after she went forward after bumping into a tree while backing out. Customer further claims that the vehicle went up an 8 foot embankment, flew across the embankment and 250 feet over a canal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1936	HIGHLANDER	2006	3/20/2009	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that on March 16, 2009 the vehicle accelerated like an airplane and took off after she went forward after bumping into a tree while backing out. Customer further claims that the vehicle went up an 8 foot embankment, flew across the embankment and 250 feet over a canal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1937	CAMRY	2007	3/23/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates when he came to a complete stop and then pressed on the gas pedal, the vehicle jumped forward. Customer further claims that there was a hesitation in shifting. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1938	CAMRY SOLARA	2008	3/23/2009	Customer called regarding her 2008 Toyota Camry Solara SE (V6). Specifically, customer claims that on February 25, 2009, she was pulling into a parking space and put her foot on the brake pedal to park when the vehicle jumped unexpectedly and accelerated forward. The vehicle came to a stop when it hit two concrete bars on ground. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1939	ES350	2008	3/23/2009	Customer called about his 2008 Lexus ES 350. Specifically, customer claims that on March 12, 2009 his wife was driving the vehicle when the accelerator got stuck and the car took off when she pulled out of a parking lot. Customer further claims the car came to a stop when it hit another vehicle. Customer claims this incident happened while the vehicle was already in motion.
1940	TUNDRA	2007	3/23/2009	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle over revved when taking off. Customer further claims the ABS locked up in snow, and that the MPG display is inaccurate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1941	CAMRY	2005	3/24/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates, on three occasions, his vehicle began to surge. On one occasion, customer claims that his vehicle began to surge and his brakes were unable to stop while in traffic. Customer claims that on other occasions it has happened while at slow speeds and pulling into parking spaces. Customer claims that the sudden acceleration occurred while the vehicle is already in motion.
1942	ES 330	2005	3/25/2009	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on an unknown date that her vehicle accelerated as she was turning into a parking lot and slowing down. Customer further claims that on an unknown date her vehicle hit two cars and a brick planter. A Field Technical Specialist inspected the vehicle. Customer claims that the acceleration occurred while the vehicle was already in motion.
1943	GS 300	2006	3/25/2009	Customer called regarding her 2006 Lexus GS300. Specifically, customer claims that on March 21, 2009 she put her foot on the gas and the vehicle lurched forward and hit the vehicle parked in front of her. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
1944	YARIS	2007	3/25/2009	Customer called regarding his 2007 Toyota Yaris. Specifically, customer claims that on a downhill, the engine accelerates, requiring him to press the brake pedal hard to stop the vehicle.
1945	CAMRY	2007	3/26/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on March 24, 2009 the vehicle took off and lurched forward and collided with another vehicle when she barely touched the gas pedal while accelerating away from a stop sign. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1946	CAMRY	2004	3/26/2009	Customer called regarding her 2004 Toyota Camry LE (V6). Customer claims that, on an unknown date, while pulling into a parking structure, the vehicle accelerated and she hit a wall causing front-end damage to her vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1947	HIGHLANDER	2008	3/26/2009	Customer called regarding his 2008 Toyota Highlander Sport. Specifically, customer claims that on March 25, 2009, his son was driving the vehicle when the accelerator stuck and the vehicle accelerated from 30 mph to 70 mph. Customer further claims that his son put both feet on the brake and they began to smoke. He then shifted into neutral and the engine continued to race. Customer further claims that when his son restarted the vehicle, the engine raced again. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1948	CAMRY	2003	3/27/2009	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on March 25, 2009 she had her foot on the break but the engine revved up. Customer further claims that her vehicle then lurched forward and took off 25 feet across a sidewalk until she hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1949	AVALON	2007	3/27/2009	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle accelerated on its own, and that the engine was noisy. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1950	AVALON	2008	3/30/2009	Customer emailed regarding his 2008 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle raced by itself when he was driving on the highway. Customer futher claims that the vehicle sometimes skipped like something was wrong with the transmission. Customer further claimed that there were problems with the speaker system, the trim and the paint on the steering wheel.

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1951	CAMRY	2009	3/30/2009	Customer called regarding his 2009 Toyota Camry Hybrid. Specifically, customer claims that on March 30, 2009, he put the vehicle into reverse and it accelerated quickly. Customer further claims that he put his foot on brake pedal and the vehicle would not stop and hit the corner of a house. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
1952	CAMRY	2007	3/31/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked intermittently when slowing down and while driving.
1953	MATRIX	2006	4/1/2009	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that he pulled the vehicle over and it turned off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1954	TACOMA	2009	4/1/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle redlined when he stepped on the clutch. Customer further claims that excessive smoke came from the vehicle's hood. A Field Technical Specialist inspected the vehicle.
1955	TUNDRA	2008	4/2/2009	Customer called about his 2008 Toyota Tundra 4X2 SR5. Specifically, customer claims that his car surged at take off on an unknown date. Customer further claims that the tires spun as the vehicle was accelerating. Customer claims this happened when the vehicle was at a full stop.
1956	TACOMA	2009	4/2/2009	Customer called regarding 2009 Toyota Tacoma Prerunner. Specifically, customer claims that the engine races when he starts the vehicle and that the RPM goes up to 1500 after which it gradually slows.
1957	CAMRY	2009	4/3/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated on its own from 60 mph to 100 mph. Customer further claims that the engine revved at 4000-5000 RPM, and continued to rev after he put the vehicle in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1958	CAMRY	2003	4/3/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on March 30, 2009 she was pulling into a handicap parking spot when the gas pedal got stuck and the break pedal did not engage. Customer further claims that her vehicle hit another vehicle in the parking lot.
1959	TACOMA	2009	4/4/2009	Customer called regarding his 2009 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date the vehicle idled at a high rpm. Customer further claims that the vehicle jerked forward or backward when pulled into gear, depending on the gear selected. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1960	TACOMA	2006	4/6/2009	Customer called about his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on April 4, 2009, the rpm went all the way up as he pressed on the accelerator to pick up speed and he landed in a ditch. Customer further claims that at the time of the accident he had his foot on the brake pedal. Customer claims this incident happened while the vehicle was already in motion.
1961	LS 460	2008	4/6/2009	Customer called regarding his 2008 Lexus LS 460. Specifically, customer claims that on an unknown date that his vehicle does not slow down when he takes his foot off the gas pedal.
1962	TUNDRA	2007	4/6/2009	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that the vehicle's throttle got stuck and the brakes would not work. Customer further claims that he was traveling at 80 miles per hour and he had to throw the vehicle in reverse in order to stop the vehicle. Customer states that he heard a noise prior to the event. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1963	PRIUS	2006	4/8/2009	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on 4/8/2009, the vehicle revved when going downhill. Customer claims that the sudden acceleration occurred while the vehicle was going downhill.
1964	TACOMA	2009	4/8/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on March 25, 2009 the vehicle's transmission wouldn't downshift while turning. Customer further claims that the transmission revved up on acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1965	TACOMA	2006	4/9/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle jumped when coming to a stop or when driving after a stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.

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1966	PRIUS	2008	4/9/2009	Customer called regarding his 2008 Toyota Prius . Specifically, the customer claims that on 12/14/2009, the vehicle experienced an accelerator issue and feels vehicle is unsafe and a lemon.
1967	IS250	2007	4/9/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on unknown dates, customer was having issues with both her transmission and engine. Customer further claims that the condition happened three times since he took the vehicle to the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion
1968	PRIUS	2007	4/10/2009	Customer called regarding his 2007 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle would lunge forward after coming to a stop. Customer further claims that there were problems with the headlights, times and trim. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1969	TACOMA	2006	4/14/2009	Customer's father called regarding customer's 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on April 12, 2009 the vehicle revved loudly and shot forward 40 to 50 feet into a shed when he put the vehicle in drive after he finished backing it up. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1970	SIENNA	2005	4/14/2009	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on April 9, 2009, she was driving at 5-7 mph when another vehicle hit the left side of her vehicle and her vehicle began to spin and immediately accelerated. She stepped on the brake but the engine revved and continued to accelerate, causing her to hit another vehicle. Customer further claims that she attempted to put the vehicle in park, but when the gear shifter went over the reverse gear, the vehicle shot backwards, went over a curb and hit a tree. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1971	CAMRY	2009	4/14/2009	Customer called regarding his 2009 Toyota Camry SE. Specifically, customer claims that on unknown dates, his vehicle's engine races.
1972	TACOMA	2006	4/15/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on 4/15/2009, as well as on multiple, unspecified occasions, the vehicle suddenly accelerated without warning. Customer claims the sudden acceleration occurred while the vehicle was already in motion, as well as under normal acceleration.
1973	IS250	2006	4/15/2009	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle red lined for a minute and a half and the gas pedal went down on its own. Customer further claims that the vehicle may have been on cruise control.
1974	TACOMA	2006	4/16/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that while driving the vehicle, he noticed that the vehicle's RPM does not come down when he downshifts from fourth to third gear. Customer further claims that the vehicle holds for three (3) to four (4) seconds before shifting. Customer also claims he hears a noise from the brakes when reversing.
1975	TACOMA	2005	4/17/2009	Customer called regarding a 2005 Toyota Tacoma. Specifically, the customer claims that an accident occurred on 4/17/2009 when attempting to stop the vehicle in a post office parking lot. Customer further claims that the vehicle has suddenly accelerated on a number of instances, but that on this occasion a crash occurred resulting in at least \$1,000 in damage to the vehicle, as well as property damage. Customer claims the sudden acceleration occurred while the vehicle was already in motion. It is unknown if FTS inspected the vehicle.
1976	TACOMA	2005	4/18/2009	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle jerked or lunged a little when he stopped at a stop sign or stop light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1977	CAMRY	2007	4/18/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on April 17, 2009, she was driving on the highway at approximately 65-70 mph when she noticed the vehicle started going faster and making a loud sound. Customer further claims that the vehicle started swerving and she was unable to control the vehicle, and the vehicle initially did not respond to the brakes. The vehicle hit a guard rail and then the brakes started working and she slowed down. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1978	CAMRY	2002	4/20/2009	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on April 6, 2009 her vehicle accelerated on its own, would not stop, and ended up running into a wall. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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1979	4RUNNER	2007	4/20/2009	Customer called reagding his 2007 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle accelerated on its own up to 85 mph, and the customer shifted into neutral to get off the highway. Customer further claims that the acceleration mainly occurred during or after long trips.
1980	CAMRY	2002	4/21/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date after she reversed into the street and hit a trailer across the street, her vehicle lurched forward and went over her yard and into her neighbor's house. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
1981	COROLLA	2009	4/22/2009	Customer emailed regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, he got the feeling of unwanted acceleration. Customer further claims that the idle was high and he had to ride his brakes more often than he should have to. Customer claims that the sudden acceleration occured when the vehicle was already in motion.
1982	GS 450h	2008	4/22/2009	Customer called regarding his 2008 Lexus GS 450h. Specifically, customer claims that on an unknown date he was putting his vehicle into park when the accelerator engaged and pushed his car into two others. Customer claims that the sudden acceleration occurred while his vehicle was at a full stop.
1983	HIGHLANDER	2004	4/23/2009	Customer called regarding his 2004 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle clunked when shifting from 1st to 2nd gear and jerked forward when driving around corners.
1984	AVALON	2006	4/23/2009	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged and that the vehicle's brake lights did not come on when the cruise control was engaged.
1985	TACOMA	2009	4/24/2009	Customer called regarding 2009 Toyota Tacoma Prerunner. Specifically, customer claims that when he attempts to slow the vehicle to under 15 miles per hour and later accelerates, the vehicle does not seem to shift into the appropriate gear.
1986	CAMRY	2009	4/24/2009	Customer called regarding his 2009 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1987	AVALON	2007	4/24/2009	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on March 24, 2009 her vehicle accelerated on its own, causing her to go down a hill and hit a tree. Customer further claims her vehicle experienced sudden unintended acceleration and hit a tree on an unknown date. Customer claims that the first incident of sudden acceleration occurred while the customer was parking the vehicle.
1988	4RUNNER	2007	4/27/2009	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on an unknown date, when she applied the brakes the vehicle stopped and then began lunging forward through a stop sign and it took her a half block to get the vehicle to stop. Customer further claims that on another unknown date, she applied the brakes and was unable to stop the vehicle, so she drove off the road and put the vehicle in park, but the engine continued to rev extremely high. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
1989	COROLLA	2009	4/27/2009	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on April 27, 2009, the vehicle jerked forward after the vehicle was parked & hit the curb, causing a dent on the center of the fender. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
1990	TACOMA	2005	4/27/2009	Customer called regarding 2005 Toyota Tacoma Prerunner L/B. Specifically, customer claims that the vehicle will leap forward when stopped at a red light. Customer further claims that the vehicle shifts "hard."
1991	GS 300	2006	4/28/2009	Customer claims that that the idle surges when the vehicle is stopped. The problem was duplicated. It was verified idle surge at stop only with A/C on. Low side pressure fluctuating between 29 psi and 42 psi causing idle surge. The probable cause was internal compressor failure.
1992	CAMRY	2008	4/28/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer complains that on 4/25/2009 his vehicle ran away and hit the back of a truck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
1993	COROLLA	2009	4/28/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates engine revved and transmission jerked, slipped and banged when trying to put vehicle in gear between 30-40 mph, and was unresponsive when trying to pass other vehicles.

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1994	PRIUS	2007	4/28/2009	Customer called regarding his 2007 Toyota Prius . Specifically, the customer claims that on 4/28/2009, the vehicle jerked when the gas pedal is released.. Customer further claims that vehicle is unable to go to neutral from drive and is concerned with noise from driver side. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was coming to a stop.
1995	CAMRY	2007	4/28/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that for approximately 4 or 5 days, he has felt the vehicle jerk when stopping and starting the vehicle. Customer further claims that the problem only happens when the fuel economy gauge moves up or down. Customer also reports that his vehicle is making noises.
1996	TACOMA	2009	4/30/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine revved up but the vehicle did not move when accelerating from low speeds of approximately 10 mph. Customer further claims that he had to pump the gas pedal a few times to get the vehicle to up shift and accelerate. An FTS inspected the vehicle.
1997	TUNDRA	2008	5/1/2009	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle took off on its own. Customer further claims that he felt the vehicle was unsafe to drive.
1998	RAV 4	2008	5/1/2009	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on four unknown dates the vehicle surged when he applied the brakes. A Field Technical Specialist (FTS) inspected the vehicle.
1999	4RUNNER	2008	5/6/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on unknown dates his vehicle launched while he was trying to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2000	CAMRY	2005	5/6/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on April 30, 2009, her vehicle lunged forward and she hit the vehicle in front of her.
2001	PRIUS	2006	5/7/2009	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle had unintended acceleration at least five times. A Field Technical Specialist (FTS) inspected the vehicle.
2002	IS250	2008	5/8/2009	Customer called regarding his 2008 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle's engine raced when his wife started the car. Customer further claims that the vehicle jumped into the neighbor's hedges when his wife put it in reverse. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2003	CAMRY	2009	5/8/2009	Customer called regarding her 2009 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle lurched forward and idles high. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
2004	RAV 4	2008	5/8/2009	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle lunged forward and would not stop when she was making a left hand turn. Customer further claims that she put the vehicle in park to stop it, and almost hit the vehicle in front of her. Customer further claims that the same problem happened to her husband, and that he put the vehicle in neutral to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2005	COROLLA	2009	5/11/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle "wandered" at highway speeds.
2006	TACOMA	2008	5/12/2009	Customer called regarding a 2008 Toyota Tacoma. Specifically, the customer claims that on 5/12/2009 the vehicle continued to accelerate after the customer passed another vehicle. Customer further claims that the vehicle continued revving when placed in neutral. The customer claims that the sudden unintended acceleration occurred at highway speeds.
2007	TUNDRA	2008	5/12/2009	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date his vehicle was having acceleration and performance issues related to the vehicle's supercharger.
2008	IS250	2006	5/13/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on an unknown date, while driving 70 mph her vehicle would not accelerate. Customer claims that this has happened on previous occasions. A Field Technical Specialist investigated the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2009	PRIUS	2009	5/13/2009	Customer called regarding her 2009 Toyota Prius . Specifically, the customer claims that on 5/13/2009, the vehicle accelerated into a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2010	CAMRY	2007	5/14/2009	Customer called regarding her 2007 Toyota Camry. Specific details about the underlying incident are unclear.

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2011	TUNDRA	2008	5/14/2009	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that the vehicle takes off rapidly and the brakes are squeaking. Customer further claims that water leaks into the vehicle.
2012	CAMRY SOLARA	2008	5/14/2009	Customer called about her 2008 Toyota Camry Solara SE. Specifically, customer claims that on May 14, 2009, the car suddenly accelerated causing her to hit a home. Customer further claims that at the time of the accident she had her foot on the brake pedal.. Customer claims this incident happened while the vehicle was already in motion.
2013	SIENNA	2007	5/18/2009	Customer called regarding her 2007 Toyota Sienna. Specifically, customer claims that her vehicle stalls even though the throttle body was replaced. A Field Technical Specialist (FTS) inspected the vehicle.
2014	COROLLA	2005	5/18/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on May 15, 2009, customer's wife put the vehicle in reverse to back out of the driveway and had just touched the accelerator pedal when the vehicle flew into reverse at full speed and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2015	TACOMA	2009	5/18/2009	Customer wrote a letter regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates his vehicle experienced two instances of sudden acceleration. Customer further claims that the vehicle is defective and that he returned the vehicle because it is a lemon.
2016	TACOMA	2005	5/18/2009	Customer called regarding his 2005 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on an unknown date his vehicle experienced acceleration power loss, whether in or out of cruise control. Customer further claims that the vehicle's acceleration jumped from 700 rpm to 4500 rpm. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2017	PRIUS	2009	5/19/2009	Customer called regarding her 2009 Toyota Prius . Specifically, the customer claims that on 5/19/2009, the vehicle accelerated over a curb into a pole and tilted on its right side. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2018	CAMRY	2009	5/20/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date, while going down a steep hill, he stepped on the brake, and the engine RPMs went from 2000 to over 3000 RPM's.
2019	RX 330	2004	5/21/2009	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date his wife was driving the vehicle when the vehicle surged and hit a tool box as well as his son and his bike. Customer further claims that this has occurred intermittently before, when he was putting the vehicle into park and when putting the vehicle into reverse.
2020	ES350	2007	5/26/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that in October of 2007 and on 5/25/2009 the vehicle just took off and accelerated with a loud sound. Customer claims that that no accident occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2021	TACOMA	2008	5/28/2009	Customer called regarding a 2008 Toyota Tacoma. Specifically, the customer claims that on 5/28/2009 the vehicle suddenly sped up while being driven by the customer's son. The customer claims the sudden unintended acceleration occurred at highway speeds and that the pedal did not stick.
2022	TACOMA	2009	5/28/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's RPM jumped from 2100 to 6000 when driving at 70 mph with cruise control.
2023	CAMRY	2004	5/28/2009	Customer claims that on an unknown date her 2004 Toyota Camry LE suddenly surged. Customer claims that her right foot was on the brake pedal when the incident occurred. Customer further claims that she had experienced a similar incident three months earlier.
2024	COROLLA	2005	6/2/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates when he lightly applied the gas pedal from a stop, the vehicle took off.
2025	CAMRY	2005	6/3/2009	Customer called regarding his 2005 Toyota Camry LE. Customer claims that while his wife was driving their vehicle, she experienced unintended acceleration. Specifically, customer claims that on an unknown date, she unintentionally accelerated, she hit a curb and the vehicle stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2026	COROLLA	2008	6/3/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle's accelerator got stuck and the engine revved and the rear tires were spinning.

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2027	PRIUS	2009	6/5/2009	Customer called regarding his 2009 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, he had a power surge at 490 miles on shut down. Customer claims he could feel the engine idling rough and shut down hard, and that the motor grabs when shutting off the gas engine, causing him to get motion sick. Customer further claims the vehicle jerked and surged while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2028	LX 570	2009	6/5/2009	Customer called regarding her 2009 Lexus LX 570. Specifically, customer claims on an unknown date that as she pulled into a parking lot at low speed, she took her foot off the accelerator to put on the brake, but the vehicle increased acceleration and went forward 5-6 feet into a ditch. An FTS inspected the vehicle.
2029	LS 400	1999	6/8/2009	Customer called regarding 1999 Lexus LS 400. Specifically, customer claims that on an unknown date that his vehicle jolts forward when he presses the accelerator. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
2030	CAMRY	2007	6/8/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her vehicle occasionally moves out of gear when the vehicle is traveling at 10 to 20 miles per hour and she takes her foot off the accelerator. Customer further claims that when she puts her foot back on the accelerator, the engine revs and goes out of gear again. Customer states that the problem was once intermittent but is now becoming more frequent. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2031	COROLLA	2009	6/8/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle's idle was too high. Customer further claims that when the a/c was on, the vehicle wanted to go forward and he had to press very hard on the brake pedal.
2032	COROLLA	2006	6/8/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date she was driving on the interstate and applied the brakes but the vehicle kept going and caused an accident. Customer further claims that on an unknown date she drove out of a driveway and put her foot on the brake when the vehicle wanted to take off.
2033	LS 460	2007	6/9/2009	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on an unknown date his vehicle accelerated without his using the accelerator.
2034	HIGHLANDER	2006	6/9/2009	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that on May 23, 2009, the vehicle was parked in the driveway and she got in to move it into the carport and put it in drive with her foot on the brake, at which point the vehicle accelerated through the car port and knocked down a gate, which knocked down her husband. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2035	TACOMA	2006	6/9/2009	Customer called regarding her 2006 Toyota Tacoma. Specifically, customer claims that in July 2008 the vehicle jumped and bumped into the vehicle in front of her when she pressed gently on the gas to accelerate at a stoplight. Customer further claims that on June 5, 2009 the vehicle made a screeching noise and accelerated right into a wall when she pressed lightly on the gas while turning into a parking space. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
2036	SEQUOIA	2007	6/11/2009	Customer called regarding his 2007 Toyota Sequoia. Specifically, customer claims that on June 11, 2009, the vehicle's throttle became stuck when on the highway. Customer further claims that he was able to stop the vehicle by hitting the brakes and driving onto the shoulder. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2037	CAMRY	2003	6/12/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that in mid April he put his foot on the brake but the vehicle raced and he could not stop it, causing him to nudge a truck up ahead.
2038	CAMRY SOLARA	2008	6/12/2009	Customer called regarding her 2008 Camry Solara SE (V6). Specifically, customer claims that on unknown dates, the entire vehicle felt like it jolted forward into the next gear, pinged and the stereo turned on by itself.
2039	PRIUS	2009	6/15/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on June 4, 2009, with about 420 mi on odometer, and while traveling at a low speed and braking while coming to a stop sign, the vehicle lurched forward. Customer claims she was able to step down on the brake hard, and no damage or accident or injury occurred. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2040	AVALON	2007	6/15/2009	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that on June 13, 2009, while pulling away from a red light, the vehicle took off by itself and would not stop. Customer further claims that the brakes would not work and the only way to stop the vehicle was to run into a curb and a parked vehicle. An Field Technical Specialist inspected the car at the dealer and determined that the floor mats and the all weather floor mats were installed incorrectly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2041	RX 450H	2010	6/16/2009	FTS notes that the vehicle exhibited a non-rhythmic surge at 65-75 mph. The vehicle was test-driven, and no other vehicles were available for comparison. No repairs.
2042	COROLLA	2009	6/16/2009	Customer called regarding his 2009 Toyota Corolla XLE. Specifically, customer claims that on June 15, 2009, he was pulling to a stop in a parking lot and the vehicle surged. He applied the brakes and the vehicle did not stop. Customer further claims that on an unknown date, he ran into the back of a pick up truck due to a surge. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2043	TACOMA	2008	6/16/2009	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle intermittently jerked forward when accelerating at a stop. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2044	LS 460	2007	6/17/2009	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on an unknown date his vehicle suddenly accelerated. An FTS inspected the vehicle.
2045	CAMRY	2007	6/19/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when he is driving at 40 miles per hour and slows the vehicle, the vehicle stays at a speed of 25 miles per hour. Customer further claims that his vehicle continues to travel when the vehicle is on an incline even when his foot is not on the accelerator.
2046	TACOMA	2006	6/19/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims that on 6/19/2009 he/she was involved in an accident when the vehicle suddenly unintentionally accelerated. FTS inspected the vehicle at the Toyota dealer. Customer claims the sudden acceleration occurred while the vehicle was at a complete stop with his/her foot on the brake.
2047	CAMRY	2008	6/24/2009	Customer emailed regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle had acceleration concerns.
2048	CAMRY	2002	6/24/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on June 5, 2009 his wife was backing out of driveway with his foot on the brake when the vehicle accelerated rapidly, shot across street into a neighbor's yard, jumped a curb and hit a tree.
2049	PRIUS	2008	6/24/2009	Customer called regarding her 2008 Toyota Prius. Specifically, customer claims that on an unknown date, the vehicle suddenly accelerated.
2050	RX 350	2010	6/25/2009	Customer called regarding her 2010 Lexus RX 350. Specifically, customer claims that on an unknown date, while driving, the vehicle accelerated on its own. Customer further claims that when starting the vehicle the engine revved full blast.
2051	RAV 4	2008	6/26/2009	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated by itself when he was stopping at a light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2052	TACOMA	2006	6/29/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle jerked when at a stop. An FTS inspected the vehicle.
2053	CAMRY	2009	7/7/2009	Customer's wife called regarding his 2009 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle jerked forward and RPMs went up and down. Customer further claims that the vehicle has stalled. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
2054	TUNDRA	2007	7/8/2009	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that when she drives the vehicle, the vehicle jerks when it is going slowly.
2055	CAMRY SOLARA	2008	7/8/2009	Customer called regarding his 2008 Toyota Camry Solara SE (V6). Specifically, customer claims that on June 21, 2009, his wife pulled up to a side curb to go to a restaurant and the vehicle was almost at a complete stop when suddenly it surged forward. She slammed on brakes but they did not work and vehicle ran into a brick building. Customer further claims on an unknown date, after putting vehicle from reverse to drive, it was able to go up driveway and down the street without touching gas pedal. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2056	ES350	2007	7/8/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that in April of 2009, his vehicle was towed in due to an alleged accelerator problem.

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2057	YARIS	2008	7/9/2009	Customer called regarding his 2008 Toyota Yaris. Specifically, customer claims that his wife was parking the vehicle and pressed on the brake when the vehicle accelerated. Customer further claims that his wife ran into a building because of the problem. Customer claims that the incident resulted in damage to the front bumper. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2058	RAV 4	2008	7/10/2009	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle did not decelerate quickly enough.
2059	PRIUS	2001	7/10/2009	Customer called regarding her 2001 Toyota Prius 4-Door. Specifically, customer claims that in 2006 her vehicle died on the freeway but then started in reverse and took off. Customer further claims that her vehicle still jumps in reverse.
2060	CAMRY SOLARA	2008	7/13/2009	Customer called regarding her 2008 Toyota Camry Solara SE (V6). Specifically, customer claims that on unknown dates, the entire vehicle felt like it jolted forward into the next gear, pinged and hesitated at acceleration. A Field Technical Specialist (FTS) inspected the vehicle.
2061	PRIUS	2007	7/15/2009	Customer called regarding her 2007 Toyota Prius. Specifically, customer claims that on an unknown date in 2007 the vehicle was stopped at a gate when the vehicle surged forward on its own and hit the gate. Customer further claims that on unknown dates the auxiliary battery was low and the vehicle was shaking after startup. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2062	TACOMA	2009	7/16/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date his vehicle went into full throttle when he was at a stop sign. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2063	SIENNA	2004	7/16/2009	Customer's insurer called regarding customer's 2004 Toyota Sienna. Specifically, customer claims that she had her foot pressed all the way down on the brakes, but that the vehicle kept accelerating. Customer further claims that she was involved in a collision with another vehicle as a result of the unintended acceleration. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2064	HIGHLANDER	2007	7/16/2009	Customer called regarding her 2007 Toyota Highlander. Specifically, customer claims that on July 5, 2009 the vehicle accelerated on its own into a parked van when she was turning right. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2065	LX 470	2004	7/20/2009	Customer called regarding her 2004 Lexus 4x4 SUV V8. Specifically, customer claims that on July 15, 2009 customer left car in park to attend to trunk when car ran downhill and hit pole. Customer further claims that parking brake was not engaged.
2066	RAV 4	2008	7/20/2009	Customer called regarding her 2008 Toyota Rav4. Specifically, customer claims that she was driving her vehicle downhill when the gas pedal became stuck to the floor. Customer further claims that the vehicle was revving to redline, and that putting the vehicle in neutral made the problem worse. Customer claims that the cruise control was on during this time. Customer states that when she was able to pull over to the side of the road and turn off the vehicle, she noticed that when the vehicle was turned back on it was still revving to redline. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2067	PRIUS	2004	7/21/2009	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on 7/21/2009, the vehicle accelerated on the road and would not stop when brakes were applied. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2068	Tacoma	2007	7/22/2009	Customer emailed regarding her 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates, her vehicle suddenly surged forward. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while already in motion at low speeds.
2069	RAV 4	2006	7/23/2009	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle's accelerator intermittently jumped and dragged, and that the accelerator pedal stuck.
2070	ES 330	2006	7/24/2009	Customer called regarding his 2006 Lexus ES 330. Specifically, customer claims that on an unknown date he was driving the vehicle when it suddenly accelerated on its own. Customer further claims that although he pressed the brake pedal, this did not slow the vehicle adequately.

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2071	TACOMA	2007	7/24/2009	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims that on 7/24/2009 he/she was involved in a single vehicle accident when the vehicle suddenly unintentionally accelerated, which it had done on prior occasions. FTS inspected the vehicle. Customer claims the sudden acceleration occurred at while the vehicle was already in motion.
2072	SIENNA	2004	7/25/2009	Customer called regarding 2004 Toyota Sienna. Specifically, customer claims that on July 24, 2009, customer was pulling into a parking space when the vehicle suddenly accelerated over a curb and hit a building. Customer further claims that she did not have her foot on the accelerator when the vehicle accelerated. Customer claims that she had her foot on the brake during the incident. Customer claims that the front bumper of the vehicle was damaged in the incident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2073	IS250	2007	7/27/2009	Customer called regarding her 2007 Lexus IS 250. Specifically, customer claims that on unknown dates, and on two occasions, his vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2074	ES350	2007	7/27/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, while in his driveway, customer's foot was on the brake when he shifted the car in reverse, and it accelerated into the neighbor's driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2075	CAMRY	2008	7/28/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer complains that on an unknown date his vehicle accelerated by itself.
2076	COROLLA	2009	7/28/2009	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates the vehicle was jerking during acceleration. Customer further claims the exhaust was too noisy, and there was a bad odor coming from catalytic converter. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2077	MATRIX	2009	7/28/2009	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle accelerated even when his foot was not on the accelerator. Customer further claims that when he approached a stop, the vehicle wanted to go forward and that when he placed the vehicle in neutral it revved to approximately 7000 RPM. Customer further claims that he had to replace the brakes multiple times due to this issue. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2078	IS250	2006	7/28/2009	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on 7/16/09, while trying to pass a vehicle on a country road, the vehicle started to accelerate and would not stop. Customer claims that that she was able to put the vehicle in neutral, but the vehicle would not shut off, she claims that she then put in park and that is when she was rear ended. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2079	IS250	2007	7/29/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on 7/28/09, she experienced unintentional acceleration. Customer further claims that while making a turn traveling at 15-20 mph when the vehicle accelerated to 80 mph. Customer claims that she was unable to stop the vehicle and eventually slammed it into park and shut the vehicle off. Customer claims that the engine revved up the odometer went into the red.
2080	VENZA	2009	7/29/2009	Customer called regarding her 2009 Toyota Venza. Specifically, customer claims that on unknown dates her vehicle's engine hesitates at times, and then revs fast into the next gear, in a jerking motion. Customer further claims that the vehicle's tire pressure monitoring system light came on for no reason. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2081	TACOMA	2006	7/30/2009	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates his vehicle intermittently experienced sudden accelerations.
2082	AVALON	2008	7/31/2009	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged when he was braking at a stop sign.
2083	TACOMA	2009	8/3/2009	Customer called regarding his 2009 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle's engine revved and grabbed when slowing down from making a turn.
2084	AVALON	2009	8/3/2009	Customer called regarding her 2009 Toyota Avalon XL. Specifically, customer claims that on an unknown date, while driving down a highway her vehicle suddenly accelerated and claims that it would not slow down and her vehicle was smoking. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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2085	IS250	2007	8/3/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on unknown dates, she had issues with sudden acceleration. A Field Technical Specialist scheduled an investigation. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2086	HIGHLANDER	2006	8/3/2009	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on August 2, 2009, he was parked on a steep grade and turned his wheels toward the curb, and when he took his foot off the brake, the vehicle accelerated and jumped the curb, jumped a wall, went across a yard and went into some bushes. Customer further claims that on unknown dates, the vehicle accelerated on its own while going downhill. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2087	Camry	2007	8/4/2009	An FTR from the U.S., issued on August 4, 2009, regarding a 2007 Toyota Camry, states that a customer complained of intermittent high RPMs. The FTS tested the vehicle and found that the RPM would occasionally remain high after applying then releasing the throttle pedal. No probable cause was determined. The accelerator sensor assembly was replaced.
2088	4RUNNER	2008	8/4/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on unknown dates when the vehicle was stopped, it idled fast with RPMs at 800-1100, and when the brake was released, the vehicle lunged. Customer further claims that this occurred most often when the a/c was turned on. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2089	4RUNNER	2005	8/4/2009	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates the vehicle jerked forward when it was stopped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2090	TACOMA	2009	8/5/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date his vehicle's transmission shifted directly from first gear to third or fourth when turning around corners. Customer further claims that the vehicle's engine revved up to approximately 2000 rpm before shifting up.
2091	PRIUS	2004	8/5/2009	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2092	TACOMA	2009	8/5/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle would keep running when he took the key out of it. Customer further claims that the front grille was improperly aligned and that the radio turns on by itself.
2093	AVALON	2006	8/6/2009	Customer called regarding his 2006Avalon XL. Specifically, customer claims that on that he is having major problems with his vehicle, stating that the engine revs when he's driving at a constant speed. Customer was advised that his car was not recalled, and should visit the dealer.
2094	TACOMA	2009	8/6/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's RPM jump but the vehicle would not move when accelerating after turning slowly. Customer further claims that he felt the engine surge when his foot was on the brake.
2095	SIENNA	2006	8/6/2009	Customer called regarding her 2006 Toyota Sienna. Specifically, customer claims that on May 28, 2009, she was pulling into a parking space when the vehicle accelerated while she was pressing the brake pedal. Customer further claims that this happened three (3) more times. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2096	PRIUS	2009	8/6/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the vehicle had unintended acceleration while braking for a right turn or a stop. Customer claims that when the vehicle surged, the ABS warning light came on, so she hits her brakes harder when it surged. Customer further claims that on an unknown date, she was pulling into her garage and the vehicle surged and hit her husband's work bench. Customer claims 8 incidents of unintended acceleration. The FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2097	COROLLA	2008	8/10/2009	Customer called regarding his 2008 Toyota Corolla CE. Specifically, customer claims on July 15, 2009 his vehicle accelerated as he pulled into a parking spot. Customer further claims this resulted in an accident when he ran into a tree. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.

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2098	AVALON	2006	8/10/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on July 29, 2009, his vehicle suddenly jumped during acceleration. Customer further claims that he has had a couple of accidents as a result of this condition. A Field Technical Specialist set up an inspection date, it is unknown if the inspection occurred. Customer claims that the sudden acceleration occurred repeatedly from the start position.
2099	SIENNA	2005	8/10/2009	Customer wrote regarding his 2005 Toyota Sienna. Specifically, customer claims that he has experienced an acceleration problem three (3) times in his vehicle. Customer claims that when he drives his vehicle down a mountain, the engine starts racing and increases the RPMs to 4000 even though he is braking.
2100	TACOMA	2009	8/10/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle maintained an idling rpm of 1200 when the clutch was engaged. Customer further claims that the vehicle's engine revved away when the clutch was engaged, and that when the clutch was in neutral the rpm increased without him pressing the accelerator.
2101	CAMRY	2009	8/11/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that an unknown date, while her vehicle was in Park, the vehicle's engine began to rev. Customer further claims that the rpms revved to 8000 twice. Customer claims that when she shut off the engine and started it again, the revving also started again. Customer claims that this revving occurred while the vehicle was stopped.
2102	CAMRY	2007	8/11/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that when vehicle is at a stop and he has his foot on the brake pedal, the vehicle can sometimes idle "almost out of control."
2103	RX 350	2010	8/12/2009	Customer called regarding his 2010 Lexus RX 350. Specifically, customer claims that on an unknown date he was driving on the highway when the throttle got stuck and vehicle picked up speed. Customer further claims that when he turned the vehicle back on, the vehicle revved to a high RPM. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2104	HIGHLANDER	2006	8/12/2009	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on August 2, 2009 the vehicle accelerated when he was attempting to park on a steep grade, causing the vehicle to go up a wall on its right two wheels and go approximately 60 feet before coming to rest in his neighbor's bushes. Customer further claims that his foot was on the brake the whole time. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2105	LS 430	2004	8/12/2009	Customer called regarding his 2004 Lexus LS 430. Specifically, customer claims that starting on July 27, 2009 he has had problems with the gas pedal and acceleration.
2106	CAMRY	2008	8/12/2009	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle idled high. Customer further claims that that the vehicle surged forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
2107	SIENNA	2006	8/12/2009	Customer called regarding her 2006 Toyota Sienna. Specifically, customer claims that on May 28, 2009, she was pulling into a parking space when the vehicle accelerated while she was pressing the brake pedal. Customer further claims that this happened three (3) more times. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2108	SIENNA	2009	8/13/2009	Customer called regarding his 2009 Toyota Sienna. Specifically, customer claims that he is having an issue with his transmission. Customer claims that when he attempts to stop the vehicle, the vehicle goes faster instead of slowing down. Customer further claims that this problem happens consistently. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
2109	CAMRY	2003	8/13/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on August 9, 2009 his brother-in-law was driving when the vehicle accelerated by itself and hit the wall of a restaurant. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2110	CAMRY	2004	8/13/2009	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on unknown dates, the acceleration on his vehicle began to fluctuate wildly. Customer believes his ECM and accelerator pedal failed simultaneously.
2111	4RUNNER	2004	8/13/2009	Customer called regarding his 2004 Toyota 4 Runner SR5. Specifically, customer claims on July 22, 2009 his car revved forward upon shifting to drive. This caused him to accelerate to approx. 30 mph and crash into a garage. Customer claims that the sudden acceleration occurred while the vehicle was in a parked position.

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2112	PRIUS	2005	8/15/2009	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates when he turned a corner and applied the brakes, the vehicle surged forward. Customer further claims that if the vehicle hit a pothole or a bump, the vehicle accelerated and it was hard to slow down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2113	HIGHLANDER	2008	8/17/2009	Customer called regarding his 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally had the RPM go up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2114	TACOMA	2005	8/17/2009	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates and runs hot. The customer claims the vehicle has done so for some time, though a specific date is not given. It is unknown if FTS inspected the vehicle. The customer claims the sudden unintended acceleration occurred while the vehicle was already in motion.
2115	TUNDRA	2007	8/18/2009	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle's rpm increased to 2500-3000 as customer was braking while going down a hill. Customer further claims that the vehicle accelerated when he pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2116	PRIUS	2010	8/21/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on two separate occasions on unspecified dates. No accident occurred on either occasion. FTS did inspect the vehicle, but did not take any action. The customer claims one that one incident occurred while the vehicle was operated at highway speed and that one occurred while the vehicle was stopped, with her foot on the brake.
2117	COROLLA	2007	8/24/2009	Customer's husband called regarding customer's 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle experienced unintended acceleration. Customer further claims that on one occasion the vehicle hit a workbench in a garage, and on another occasion it hit a gate. Customer further claims that the unintended acceleration happened both going forward and going backward.
2118	TACOMA	2005	8/24/2009	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims that the vehicle suddenly unintentionally accelerated which caused an accident on 8/11/2009. It is unknown if FTS inspected the vehicle. The customer claims the vehicle suddenly accelerated while already in motion.
2119	TACOMA	2009	8/25/2009	Customer called regarding his 2009 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle would not accelerate when he slowed down to 5-10 mph and then pressed the gas pedal. Customer further claims that he heard the engine rev and make noise for 1-2 seconds.
2120	CAMRY	2009	8/26/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle lunged forward and hit a tree. Customer further claims that the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2121	PRIUS	2008	8/27/2009	Customer called regarding his 2008 Toyota Prius Hybrid. Specifically, customer claims that on August 13, 2009, after he filled vehicle with gas, the vehicle's warning lights came on. Customer further claims that on August 15, 2009, when he tried to pull the vehicle out of the driveway to take to dealer, it died, and when he started it up again, he pushed gas pedal and at first, the vehicle did not move. Then the vehicle lunged forward suddenly and hit a pole. The FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2122	ES350	2007	8/28/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, she experienced unintended acceleration and she rear ended another vehicle. A Field Technical Specialist set up an appointment for inspection. Customer claims that the sudden acceleration occurred while the vehicle while the vehicle was already in motion.
2123	RAV 4	2008	8/29/2009	Customer called regarding her 2008 Toyota Rav4. Specifically, customer claims that the vehicle accelerated on its own twice. The details of the underlying incidents are unclear.
2124	GS 300	2006	8/31/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date her pedal is sticking to the floor of the vehicle.
2125	PRIUS	2009	8/31/2009	Customer called regarding his 2009 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated when the vehicle goes over a bump. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2126	CAMRY	2009	8/31/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own. A Field Technical Specialist set up an appointment for inspection.
2127	CAMRY	2005	9/1/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer's brother-in-law called on her behalf claiming that she was recently involved in an accident. Customer claims that she does not remember a lot about the accident but while driving on the highway, her vehicle began spinning and she hit the rail. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2128	TACOMA	2008	9/3/2009	Customer called in regarding a 2008 Toyota Tacoma. The customer claims the vehicle unintentionally accelerated on two separate occasions, but did not specify the particular dates. No accident or damage occurred on either occasion. FTS did not inspect the vehicle. The customer claims the vehicle suddenly accelerated while already in motion, but that in one instance it occurred just after lifting his/her foot from the brake.
2129	CAMRY	2010	9/8/2009	Customer called regarding his 2010 Toyota Camry XLE. Specifically, customer claims that on various unknown dates the vehicle jerks when easing on the gas pedal, usually when the car is fighting gravity. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
2130	LX 470	2007	9/9/2009	Customer claims that the engine surges, especially when driving up an incline, and that condition is most noticeable when engine RPM is approximately 2200 RPM. Fuel pressure, fuel pump relay control voltage, and fuel pump resistor resistance inspected. Fuel pump replaced.
2131	CAMRY	2009	9/9/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle took a big jump when accelerating from a complete stop.
2132	TACOMA	2009	9/10/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine seemed to rev up and delayed for a few seconds when accelerating out of a turn at low speeds. An FTS inspected the vehicle.
2133	ES350	2008	9/10/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, while driving his vehicle he thinks he might have had an unintended acceleration situation, but he is not sure. There was no incident reported. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2134	GS 300	2006	9/10/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date she was close to getting in an accident and at the time thought that it was because she might have stepped on the gas.
2135	AVALON	2005	9/10/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on July 12, 2009, while her grandson was driving her vehicle, he was making a right, and accelerated very fast and then hit a stop sign. Customer claims that this may have been an unintended acceleration issue. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2136	TUNDRA	2006	9/10/2009	Customer called regarding his 2006 Toyota Tundra 4x2. Specifically, customer claims that on July 29, 2009 while he pulled into a parking the vehicle would not slow down when applied the brakes. Customer further claims his car then surged forward and struck a pole. Customer further claims that on October 24, 2009, the vehicle again accelerated on its own. A Field Technical Specialist (FTS) inspected the vehicle. Customer claim the sudden acceleration occurred while the vehicle was already in motion.
2137	CAMRY	2006	9/10/2009	Customer called regarding her 2006 Toyota Camry LE. Specifically, customer claims that on unknown dates, she had experienced some acceleration issues. Specifically, customer claims that the vehicle jerks ferociously when the speed descends and is coasting between 20 - 30mph.
2138	CAMRY	2010	9/14/2009	Customer called regarding his 2010 Camry LE. Specifically, customer claims that on various unknown dates the vehicle will suddenly accelerate when slowly stepping on the brakes around 15-20 mph, forcing him to step on the brake harder in order to slow down the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2139	PRIUS	2007	9/16/2009	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when braking or coming to a stop, his Prius will accelerate on its own slightly. Customer states he has never taken the car to the dealer, and will do so if problem recurs. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2140	HIGHLANDER	2008	9/17/2009	Customer called about her 2008 Toyota Highlander Sport. Specifically, customer claims that on September 15, 2009, the car suddenly accelerated causing him to drive onto someone's lawn. Customer further claims that at the time of the accident he had his foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2141	SCION tC	2008	9/17/2009	Customer called regarding her 2008 Scion tC. Specifically, customer claims that in July 2009, she was driving the vehicle on cruise control but when she tried to turn the cruise control off the vehicle sped up. Customer further claims that even when she is going 50 miles per hour the vehicle surges unexpectedly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2142	CAMRY	2007	9/17/2009	Customer called regarding his 2007 Toyota Camry. Customer claims that he experiences unintended acceleration. Other details regarding the alleged incident are unclear.
2143	CAMRY	2002	9/18/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on August 5, 2009 she was driving the vehicle and as she turned a corner it started to rev up but that she was able to slow it down. Customer further claims that when she turned into the garage, the vehicle revved up again and accelerated through the garage door and the garage wall before being stopped by a mud bank.
2144	ES 330	2004	9/18/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, her vehicle accelerated upon being turned on and drove itself into a building.
2145	ES 300	2003	9/18/2009	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date as he was moving up an on-ramp to get onto the freeway he experienced a sudden acceleration and hit another car. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2146	SIENNA	2004	9/19/2009	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on two occasions, dates unknown, his vehicle has accelerated on its own while stopped with the brakes applied.
2147	ES 300	2003	9/19/2009	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date as he was parking and pressing the brake, the vehicle lunged forward.
2148	CAMRY SOLARA	2008	9/21/2009	Customer called about her 2008 Toyota Camry Solara SLE. Specifically, customer claims that on September 18, 2009, the car suddenly accelerated causing her to hit a fence. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2149	IS250	2006	9/22/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on unknown dates, her vehicle shakes and accelerates and shuts off.
2150	CAMRY	2009	9/22/2009	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on September 12, 2009, she backed out the vehicle out of the garage and the car would not stop. She hit a fence, deck and utility house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2151	CAMRY SOLARA	2006	9/23/2009	Customer's husband called regarding customer's 2006 Toyota Camry. Specifically, customer claims that in June 2008, she had pulled into a parking space and pressed the brake when the vehicle leaped forward, went over the curb and through the plate glass of a shop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2152	CAMRY	2009	9/23/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 9/22/09 the vehicle suddenly accelerated forward, after backing up out of a parking space and putting the vehicle in drive. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
2153	CAMRY	2002	9/23/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on September 4, 2009, after tapping a telephone pole while backing up, the vehicle jerked and lurched forward despite his hitting the brakes. An FTS inspected the vehicle.
2154	CAMRY	2007	9/24/2009	Customer's husband called regarding customer's 2007 Toyota Camry. Specifically, customer claims that on September 22, 2009, she was pulling slowly into a parking space when the car took off on its own and went over two parking curbs and crashed into some bushes. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2155	YARIS	2009	9/24/2009	Customer called regarding her 2009 Toyota Yaris. Specifically, customer claims that, September 22, 2009, the vehicle accelerated while making a left turn hitting a guard rail. Customer further claims the vehicle is totaled. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2156	PRIUS	2010	9/24/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the vehicle jumped forward when braking if there is a bump in the road. Customer further claims that there were multiple blind spots on the vehicle and feels it is unsafe for his family. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2157	CAMRY	2002	9/25/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle's accelerator pedal on its own went down then came back up.
2158	CAMRY	2005	9/25/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on two occasions, her vehicle accelerated forward as she was parking. Customer claims that on September 23, 2009, the vehicle seemed to accelerate forward on its own as she was pulling into a parking space and the vehicle went over the cement barrier.
2159	LS 430	2004	9/28/2009	Customer called regarding his 2004 Lexus LS 340. Specifically, customer claims that on September 28, 2009 his car sped off rapidly after taking his foot off the brake. Customer further claims that he was forced to do an emergency stop. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
2160	4RUNNER	2007	9/28/2009	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that on September 26, 2009, he was driving the vehicle on the highway when he experienced unintended acceleration. Customer further claims that vehicle accelerated up to 90 miles per hour. Customer claims that he was not able to brake the vehicle. Customer states that he was able to get the car to the side of the road but that the vehicle jerked and bucked before stopping. Customer claims that he turned the vehicle off and back on but that the vehicle kept revving. Customer claims that cruise control was on during the incident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2161	Prius	2010	9/29/2009	Customer claims that when driving 15-25 mph and hitting a bump while braking, the vehicle accelerates. A Field Technical Specialist inspected the vehicle and duplicated the condition. Other vehicles were compared to customer's vehicle and operated in the same manner.
2162	CAMRY	2005	9/29/2009	Customer called regarding her 2005 Toyota Camry LE. Customer claims that on an unknown date, she had an experience in which her pedal got stuck. Customer further claims that she had a second related incident when backing up.
2163	Prius	2009	9/29/2009	Customer called regarding her 2009 Toyota Prius. Specifically, customer claims that on an unknown date, customer's vehicle was in an accident.
2164	RX 350	2010	9/30/2009	Customer claims that that the vehicle jerks when accelerating from a stop. The vehicle was tested, and the condition was confirmed. Replaced the ECM and test drove, and the condition was still present. Swapped the ECT and test drove, and the condition was still present.
2165	ES350	2007	9/30/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle experienced sudden acceleration while his wife was driving.
2166	CAMRY	2009	9/30/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on multiple unknown dates her vehicle has accelerated on its own. Customer further claims it is not due to the floor mats. Customer did not state how the sudden acceleration occurred.
2167	4RUNNER	2006	9/30/2009	Customer called regarding his 2006 Toyota 4Runner. Customer claims that on an unknown date he experienced the floor mat getting stuck in the accelerator.
2168	YARIS	2009	9/30/2009	Customer called regarding her 2009 Toyota Yaris. Specifically, customer claims that she is experiencing some concerns regarding her floor mats. Specifics are unclear.
2169	COROLLA	2005	9/30/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on September 28, 2009, she was driving on the highway when the vehicle started to decrease in speed so she tapped the gas pedal, at which point the vehicle accelerated to 80 mph and kept speeding up and going toward the left. Customer further claims that she was unable to stop the acceleration by taking her foot off the gas pedal and applying the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2170	CAMRY	2007	9/30/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on July 30, 2009, she was traveling at 50 miles per hour on the highway when she suddenly changed lanes. Customer claims that the vehicle began to speed up when she was in the right hand lane. Customer further claims that she could not move the steering wheel and that the vehicle began to circle clockwise, and that the brakes failed. Customer alleges that vehicle collided with center divider. Customer claims she sustained a fractured ankle, foot, and several minor injuries in the crash. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2171	RX 350	2007	9/30/2009	Customer called regarding her 2007 Lexus RX 350. Specifically, customer claims that on an unknown date she has experience problems with sudden acceleration.
2172	GS 350	2007	9/30/2009	Customer called regarding her 2007 Lexus GS 350. Specifically, customer claims that on an unknown date she was pulling into a parking space and the vehicle accelerated.
2173	Prius	2004	9/30/2009	Customer called regarding her 2004 Toyota Prius. Specifically, customer claims that on an unknown date, customer's vehicle was in an accident due to the accelerator and floor mat.
2174	CAMRY	2005	9/30/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims on unknown dates two or three years prior to this complaint (2009), her vehicle twice experienced unintended acceleration.
2175	LX 570	2008	9/30/2009	Customer called regarding her 2008 Lexus LX 570. Specifically, customer claims that on May 19, 2009 the pedal stuck to the floor.
2176	CAMRY	2006	9/30/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on September 28, 2009, he was driving in traffic and hit the brakes, but the vehicle would not stop, causing an accident. Customer further claims that on an unknown date he was pulling into a parking space with his foot on the brake, but the vehicle would not stop and he crashed into an apartment building. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2177	PRIUS	2008	9/30/2009	Customer called regarding his 2008 Toyota Prius. Specifically, customer claims that on September 20, 2009 the vehicle's accelerator pedal got stuck due to the floor mat and the vehicle lurched forward into a tree.
2178	SIENNA	2009	9/30/2009	Customer called regarding his 2009 Toyota Sienna. Specifically, customer claims that while he was driving on the highway, the vehicle began to accelerate.
2179	PRIUS	2010	9/30/2009	Customer called in regarding a 2010 Toyota Prius. The customer claims the vehicle unintentionally accelerates, but did not provide a specific date. No accident or damage occurred. It is unknown if FTS examined the vehicle. The customer claims the acceleration occurs while the vehicle is already in motion.
2180	CAMRY	2005	9/30/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, he could not stop his vehicle while pulling into a parking garage. Customer claims that he did everything he could to stop the vehicle, but he hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2181	RX 350	2010	9/30/2009	Customer called regarding her 2010 Lexus RX 350. Specifically, customer claims that on an unknown date she could not stop her vehicle at 100 miles per hour and had to slam on the brakes.
2182	TUNDRA	2006	9/30/2009	Customer called regarding his 2006 Toyota Tundra 4x4. Specifically, customer claims that three years ago he was driving the vehicle toward a yellow light when the floor mat slid down over the accelerator and he stopped by hitting the brake. Customer further claims that the vehicle went about a quarter of a mile before stopping after he put the vehicle into neutral and then turned it off. Customer further claims that he has experienced excessive speeds.
2183	CAMRY	2006	9/30/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he hit the gas pedal to pass another vehicle and hit a bump and the gas pedal got stuck.
2184	GS 300	1999	9/30/2009	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on approximately a dozen occurrences on unknown dates his vehicle accelerated while idling. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
2185	GS 300	2000	9/30/2009	Customer called regarding his 2000 Lexus GS300. Specifically, customer claims that on unknown dates his vehicle accelerated on its own. Customer further claims that this acceleration nearly caused him to get into accidents.
2186	CAMRY	2003	9/30/2009	Customer called regarding his 2003 Toyota Camry XLE. Customer claims that on unknown dates in 2003, he had issues with his floor mat.

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2187	CAMRY	2003	9/30/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on September 28, 2009 he was intending to move the vehicle a few feet when the accelerator stuck and the vehicle took off and ran into the house across the street. An FTS inspected the vehicle.
2188	COROLLA	2007	9/30/2009	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle had experiences of sudden acceleration. Customer further claims that the vehicle has not accelerated by itself since he removed the floor mat.
2189	RAV 4	2007	9/30/2009	Customer called regarding her 2007 Toyota Rav4 Limited (V6). Specifically, customer claims that on September 12, 2009, his floor mat got caught on his gas pedal. Customer claims that this occurred while the vehicle was already in motion.
2190	COROLLA	2005	9/30/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on September 26, 2009 the vehicle's gas pedal got stuck and the vehicle took off at around 40 mph as she was pulling out of a driveway, causing her to run into a wooden fence. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2191	COROLLA	2007	9/30/2009	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on an unknown date he was making a u-turn when the vehicle started zooming and he could not stop, causing him to hit a mailbox. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2192	IS 300	2001	9/30/2009	Customer called regarding his 2001 Lexus IS 300. Specifically, customer claims that last year on an unknown date his vehicle had unintended acceleration and blew up the motor.
2193	COROLLA	2008	9/30/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on August 21, 2009 the vehicle accelerated and the brakes did not function when she was pulling into an auto store for oil service. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2194	RX 330	2005	9/30/2009	Customer called regarding his 2005 Lexus RX 330. Specifically, customer claims that on unknown dates he experienced stuck floor mats and could not apply the brakes.
2195	SEQUOIA	2002	9/30/2009	Customer called regarding his 2002 Toyota Sequoia SRS. Specifically, customer claims that she has experienced problems with the floor mats in her car.
2196	ES 330	2004	9/30/2009	Customer called regarding her 2004 Lexus ES 300. Specifically, customer claims that in February 2009 her vehicle jumped and zoomed into her house because the floor mat caused the pedal to be stuck.
2197	SCION TC	2006	9/30/2009	Customer called regarding her 2006 Scion TC. Specifically, customer claims that on an unknown date, she was pulling the vehicle out of a parking spot and vehicle continued to accelerate. Customer further claims that she attempted to stop the vehicle but could not do so until she applied the emergency brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2198	CAMRY	2010	9/30/2009	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on an unknown date he was approaching a stop sign and began to press the brake, but the vehicle increased in speed and wouldn't slow down. The accelerator didn't release until the vehicle was turned to the right. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2199	COROLLA	2008	9/30/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on October 28, 2008 the vehicle took off and went into a building when she was pulling into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2200	CAMRY	2002	9/30/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date that she put the car into drive the floor mat went under the accelerator and the vehicle went out of control. Customer further claims that on a separate occasion where the mat went under the accelerator and the vehicle shot through the bay at an Alkaline location and may have hit a facility rep.
2201	Camry	2003	9/30/2009	Customer called regarding her 2003 Toyota Camry. Specifically, customer states that on unknown dates, her floor mat interfered with her gas pedal.
2202	TACOMA	2008	9/30/2009	Customer called in regarding a 2008 Toyota Tacoma. The customer claims the vehicle unintentionally accelerated on 9/20/2009, causing an accident. FTS did not inspect the vehicle. The customer claims the unintended acceleration occurred while the vehicle was already in motion.

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2203	SCION TC	2006	9/30/2009	Customer called regarding her 2006 Scion TC. Specifically, customer claims that on an unknown date, she was driving on the freeway and when she attempted to slow down to make a left turn, the vehicle shot forward and went to the right, causing her to drive off the freeway and up an embankment. Customer further claims that the vehicle continued to move until it choked out and rolled over two times. Customer further claims that she tried to hit the brakes but the vehicle wouldn't stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2204	Corolla	2009	9/30/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, customer's vehicle accelerated in a concerning way.
2205	COROLLA	2005	10/1/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the floor mat got caught in the accelerator and it caused the vehicle to accelerate on its own.
2206	COROLLA	2007	10/1/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on an unknown date the accelerator got stuck while she was backing up and she almost hit other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2207	CAMRY	2007	10/1/2009	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date she was driving about 20 mph and touched the brake pedal to stop and the vehicle surged forward to about 35 mph before customer could stop the vehicle. Customer further claims that she had to pump the brakes once to get the brakes to engage, and that she has had this experience three times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2208	AVALON	2007	10/1/2009	Customer's wife called regarding customer's 2007 Toyota Avalon. Specifically, customer's wife claims that on December 13, 2007 the vehicle took off when she was backing out of a parking spot at approximately 1 mph. Customer's wife further claims that she fell out of the vehicle and that the vehicle ran over her legs and hit another parked vehicle. Customer's wife claims that the sudden acceleration occurred while the vehicle was already in motion.
2209	Tacoma	2005	10/1/2009	Customer emailed regarding his 2005 Toyota Tacoma. Specifically, customer claims that on an unknown date, customer's floor mat caused his vehicle to accelerate.
2210	CAMRY SOLARA	2007	10/1/2009	Customer called regarding her 2007 Toyota Camry Solara SE. Specifically, customer claims that on or about July 22, 2009 or July 23, 2009, while parking and braking, the vehicle accelerated causing her to hit a wall. Customer claims that accident caused damage to the front bumper. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2211	GS 350	2007	10/1/2009	Customer called regarding her 2007 Lexus GS 350. Specifically, customer claims that on an unknown date, she was in an accident when her vehicle unintentionally accelerated.
2212	CAMRY	2004	10/1/2009	Customer called regarding her 2004 Toyota Camry LE. Customer claims that he has had an issue with unintended acceleration. Customer further claims that he has experienced unintended acceleration on two occasions. Customer claims that on September 6, 2009, his vehicle accelerated out of control.
2213	TUNDRA	2006	10/1/2009	Customer called regarding his 2006 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the floor mat caught under the accelerator pedal.
2214	AVALON	2007	10/1/2009	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on July 4, 2007 the vehicle accelerated and ran into a brick pillar when she was braking to pull into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2215	CAMRY	2006	10/1/2009	Customer called regarding her 2006 Toyota Camry LE. Specifically, customer claims that on more than one occasion, on unknown dates, he has experienced an issue where his vehicle would not slow when his brakes were applied.
2216	CAMRY	2009	10/1/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 9/19/09 she was pulling forward into a parking space when the vehicle suddenly leapt forward and to the right, when it hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2217	HIGHLANDER	2007	10/1/2009	Customer called on an unknown date inquiring as to whether his 2007 Toyota Highlander Limited was involved in the recall. Specifically, customer claims that back in 2008 he was involved in an accident due to concerns with the pedal. FTS inspected the vehicle.
2218	CAMRY	2003	10/1/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on September 27, 2009 she was pulling her vehicle into a parking spot when the vehicle suddenly accelerated and went over a cement island and hit a parked car. Customer claims the sudden acceleration occurred while the vehicle was already in motion.

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2219	CAMRY	2009	10/1/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 9/27/09 she was pulling into a parking space and pressed the brake pedal, which was stiff and would not depress. The vehicle continued forward over the concrete barrier; customer states that then, she meant to hit the brake, but slightly hit the accelerator, whence the vehicle surged forward into a wall. Customer further claims she then put car in reverse and slightly pressed the accelerator, and the vehicle again surged in reverse. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2220	CAMRY	2007	10/1/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claim that on unknown dates when she accelerated from a stop or was coming to a stop, the vehicle would intermittently surge. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2221	TUNDRA	2007	10/1/2009	Customer called regarding her 2007 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle was involved in two separate accidents. Customer claims that the accidents may have been caused by the floor mat issue. Customer claims that in the first accident, her husband was driving the vehicle and pressed on the brakes but that the engine rushed and the vehicle would not stop. Customer further claims that the vehicle was involved in a second accident, in which the customer's husband hit the brakes, but that the vehicle would not stop and ran into a tractor. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2222	PRIUS	2009	10/1/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, vehicle had a hard jerk in the back when vehicle is at a stop. Customer claims that the issue was intermittent. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2223	CAMRY	2004	10/1/2009	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on July 25, 2008, his wife was involved in an accident while in a drive-thru line. Customer claims that the vehicle took off on its own at approx 20 mph like a jet causing her to hit the side of the building. Customer claims that the sudden acceleration occurred while the vehicle was stopping and going.
2224	4RUNNER	2004	10/1/2009	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on September 17, 2009, she pulled into a parking spot and pressed the gas pedal to move forward a little bit when the vehicle accelerated "at zooming speed" and went through the wall of a store. Customer further claims that she applied the brakes but they did not work. A Field Technical Specialist failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2225	COROLLA	2005	10/1/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on July 22, 2009 the vehicle sped forward as she was backing out of a parking space, then the vehicle veered left, causing her to hit a tree and a parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2226	UNKNOWN	UNKNO WN	10/1/2009	Customer called regarding her 2006 or 2007 Toyota Highlander. Customer claims that on two occasions on unknown dates, her father was involved in accidents due to the accelerator sticking.
2227	TUNDRA	2008	10/1/2009	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle would not stop and rear-ended another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2228	YARIS	2007	10/1/2009	Customer called regarding her 2007 Toyota Yaris. Specifically, customer claims that on August 11, 2009, the floor mat bunched up, causing the vehicle to accelerate. Customer further claims that she hit the brakes, but it was too late and she rear ended another vehicle.
2229	CAMRY	2007	10/1/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she "experienced the issue with the floor mats" twice where the car accelerated uncontrollably. Customer seeks to find out what Toyota was doing for its customers who have experienced this problem with their Toyota vehicle.
2230	TACOMA	2007	10/1/2009	Customer called in regarding a 2007 Toyota Tacoma. The customer claims the vehicle unintentionally accelerated on several instances, but did not provide a date. It is unknown if FTS inspected the vehicle. The customer further claims that the sudden acceleration occurred while the vehicle was already in motion. No accident occurred at any time.
2231	RAV 4	2007	10/1/2009	Customer emailed regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she started to back the vehicle out of a driveway when the vehicle launched forward at high speed, hitting a light pole and a porch.

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2232	CAMRY	2006	10/1/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date customer's daughter was driving the vehicle and the floor mat got stuck under the pedal.
2233	COROLLA	2006	10/1/2009	Customer emailed regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the gas pedal did not disengage after downshifting.
2234	AVALON	2006	10/1/2009	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that in September 2009 the vehicle surged forward into a concrete pole while she was going approximately 10 mph in a parking lot. Customer further claims that the vehicle continued to hit the pole as if the accelerator was stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2235	HIGHLANDER	2004	10/1/2009	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on an unknown date her husband pulled into the garage and the vehicle suddenly lunged forward.
2236	COROLLA	2008	10/1/2009	Customer emailed regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the floor mat got stuck under the pedal.
2237	CAMRY	2002	10/1/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on September 15, 2009 she was driving 35-40 mph when vehicle accelerated on its own. Customer further claims that she tapped pedal and vehicle slowed down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2238	COROLLA	2008	10/1/2009	Customer emailed regarding his 2008 Toyota Corolla. Specifically, customer claims that on unknown dates, his wife was driving the vehicle and could not get it to stop when approaching an intersection.
2239	CAMRY	2002	10/1/2009	Customer called regarding his 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date his vehicle experienced unintended acceleration which almost caused an accident.
2240	Camry	2007	10/1/2009	Customer emailed regarding her 2007 Toyota Camry. Specifically, customer claims that on May 31, 2007 her daughter was driving the vehicle and was killed when her vehicle ran into a large truck.
2241	CAMRY	2005	10/1/2009	Customer called about her 2005 Toyota Camry LE. Specifically, customer claims that on three unknown dates, the car suddenly accelerated. Customer further claims that at the time of the accelerations he had his foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2242	CAMRY	2007	10/1/2009	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he/she experienced an instance of unintended acceleration. Customer further claims that he/she was able to stop the vehicle and that the floor mat and gas pedal were not interfering with each other. Customer further claims that vehicle has accelerated after braking on two occasions. Customer claims that sudden acceleration occurred after the vehicle was at a full stop.
2243	PRIUS	2008	10/2/2009	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerates. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2244	CAMRY	2005	10/2/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on September 24, 2009, while the vehicle was stopped in front of a garage door, his wife reached to turn the vehicle off, when it jumped or surged forward and hit the garage door. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2245	ES 330	2005	10/2/2009	Customer called regarding his 2005 Lexus ES 330. Customer claims that on an unknown date, the floor mat got stuck on the accelerator. Customer was able to stop after pulling out the mat. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2246	RAV 4	2007	10/2/2009	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on two unknown dates the vehicle accelerated after he hit the brake. Customer further claims that in the first instance, he was at a stop sign, and in the second, he was in his driveway.
2247	PRIUS	2008	10/2/2009	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated due to floor mats.
2248	CAMRY	2008	10/2/2009	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 10/01/2009 her vehicle accelerated by itself and hit the garage door. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2249	SC 430	2002	10/2/2009	Customer called regarding his 2002 Lexus SC 430. Specifically, customer claims that on an unknown date there was an issue with the floor mat.

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2250	COROLLA	2006	10/2/2009	Customer emailed regarding his 2006 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle's gas pedal got stuck.
2251	TACOMA	2008	10/2/2009	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer sought more information regarding the floor mat issue. Customer further claims that on unknown dates she sometimes felt that the vehicle accelerated or decelerated on its own.
2252	PRIUS	2005	10/2/2009	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2253	4RUNNER	2007	10/2/2009	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that he was put in a life-threatening situation when his vehicle accelerated. Customer seeks a replacement vehicle because of his concerns.
2254	4RUNNER	2008	10/2/2009	Customer wrote regarding her 2008 Toyota 4Runner. Specifically, customer claims that on unknown dates her accelerator has become stuck twice. Customer further claims that she was able to disengage the accelerator by putting one foot on the brake and one foot on the gas pedal.
2255	AVALON	2007	10/2/2009	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on that on September 24, 2009, she was in an accident because the accelerator allegedly got stuck. Customer had her vehicle repaired and now believes that her foot possibly slipped off the brake onto the accelerator. Customer's case was closed.
2256	GS 300	2002	10/2/2009	Customer called regarding her 2002 Lexus GS 300. Customer claims that on an unknown date, while parking her car, she pressed on the brake and the vehicle accelerated and she was unable to stop it. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2257	ES 330	2006	10/2/2009	Customer called regarding her 2006 Lexus ES 330. Customer claims that on unknown dates the vehicle twice accelerated on its own.
2258	CAMRY	2010	10/2/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates, the vehicle accelerated on its own. Customer further claims that on one occasion it happened after starting the engine in the morning after it had not been started for a couple of days. Customer claims that the vehicle goes from 1600-2100 RPMs in the morning but when its warmed up vehicle runs at about 750 RPM. Customer claims that the revving occurs when the vehicle is at a full stop.
2259	CAMRY	2005	10/2/2009	Customer called regarding his 2005 Toyota Camry XLE (V6). Specifically, customer claims that on September 26, 2009, his wife was involved in an incident in which the gas pedal got stuck causing her to back into a mailbox. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2260	HIGHLANDER	2006	10/2/2009	Customer called regarding her 2006 Toyota Highlander. Customer states that on an unknown day in March 2003, she was driving the vehicle up a small incline, moving slowly, when the vehicle took off, causing her to drive into a drainage ditch. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
2261	RX 330	2004	10/2/2009	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date, he was in an accident when he was parking his vehicle and it suddenly hit a wall.
2262	PRIUS	2005	10/2/2009	Customer emailed regarding his 2005 Toyota Prius. Specifically, customer claims that on an unknown date he was teaching his daughter to drive in a parking lot when the accelerator stuck and the vehicle crashed through a gate and sped across a field. Customer further claims that he could not stop the vehicle and he had to crank the wheel to get the vehicle onto the grass and keep it from going into an embankment, but the car went through two fences and up the embankment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2263	PRIUS	2005	10/2/2009	Customer emailed regarding his 2005 Toyota Prius. Specifically, customer claims that in late April 2009 the vehicle accelerated and his daughter lost control, causing her to run into a telephone pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2264	SEQUOIA	2005	10/3/2009	Customer called regarding his 2005 Toyota Sequoia. Specifically, customer claims that on an unknown date the gas pedal went down to the floor at 80 mph and he had to keep pumping the brakes.
2265	COROLLA	2007	10/5/2009	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on October 4, 2009, he was making a right turn onto a street and tried to stop for another vehicle but was not able to stop, causing him to hit the other vehicle. Customer further claims that after he tapped that vehicle, every time he tried to stop his vehicle it accelerated, and he then removed the key from the ignition and coasted into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2266	CAMRY	2010	10/5/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates, when she takes her foot of the pedal while the vehicle is stopped, the engine sounds like it is racing. Customer claims that this condition occurs while the vehicle is stopped.
2267	ES 330	2005	10/5/2009	Customer called regarding her 2005 Lexus ES 330. Specifically, customer states that on October 4, 2009, when she took her foot off accelerator the car continued to accelerate. The floor mat was not involved. Customer claims the sudden acceleration occurred while the vehicle was in motion.
2268	ES 330	2006	10/5/2009	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on July 29, 2009, she was in an accident. Customer further claims that she was pulling into a parking space when the vehicle suddenly lurched forward and hit a brick building. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2269	CAMRY	2008	10/5/2009	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date, his vehicle sped forward because he believes his vehicle's pedals were stuck. Customer claims that he was able to bring his vehicle to a stop.
2270	RAV 4	2009	10/5/2009	Customer called in regarding a 2009 Toyota Rav4. The customer claims the vehicle unintentionally accelerated on 10/4/2009. Customer further claims that no accident occurred. FTS did not inspect the vehicle. The customer claims the unintended acceleration occurred while the vehicle was already in motion.
2271	TACOMA	2005	10/5/2009	Customer called regarding his 2005 Toyota Tacoma PreRunner. Specifically, customer claims that on October 4, 2009 the vehicle's accelerator stuck when he was backing up. Customer further claims that he ran into his other vehicle, and that unintended acceleration possibly caused the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2272	CAMRY	2009	10/5/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date, while making a right turn, his vehicle accelerated on its own. Customer claims that he jumped the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2273	ES 300	2002	10/5/2009	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on an unknown date he almost got into an accident because the floor mat slid up under the accelerator pedal. Customer further claims that he has an ongoing issue with the floor mats.
2274	CAMRY	2009	10/5/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date, she was in an accident with her 2009 Camry and is not sure if it is related to the floor mat in her vehicle.
2275	IS250	2006	10/5/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on an unknown date, the pedal stuck. Customer claims that she was not touching the pedal and it was still accelerating. Customer further claims that she was able to un-stick the pedal after pulling off the road. FTS conducted an inspection of the vehicle, no manufacturing defects were found. All systems were operating as designed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2276	HIGHLANDER	2006	10/5/2009	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on an unknown date his wife was driving 25 mph when the accelerator pedal got hard and stuck; she hit the brake pedal but the vehicle did not stop, resulting in a collision. Customer further claims the vehicle is now making a noise in front.
2277	AVALON	2005	10/5/2009	Customer called regarding her 2005 Avalon. Specifically, customer claims that on August 27, 2008, while driving her vehicle, she was turing right and when she applied the brakes, her vehicle accelerated. Customer further claims she drove a block and she rear ended another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2278	GS 300	2006	10/5/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date while her husband was driving the vehicle the floor mat became stuck and the vehicle accelerated up to 85 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2279	AVALON	2006	10/5/2009	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on or about the week before October 5, 2009, her vehicle accelerated. Customer further claims that she had to turn off her engine to stop the vehicle. Customer took the vehicle to the dealer and the dealer advised the customer to remove the floor mats, and determined there were no concerns with the vehicle.
2280	HIGHLANDER	2008	10/5/2009	Customer called regarding his 2008 Toyota Highlander Ltd. Specifically, customer claims that in June 2009 the check engine light was on. Customer further claims that in July 2009 the vehicle was jerking. Customer further claims that in September 2009 the check engine light came on.

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2281	COROLLA	2005	10/5/2009	Customer emailed regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates, her vehicle suddenly accelerated. Customer further claims that when she released the gas pedal, the car roared and sped up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2282	CAMRY	2002	10/5/2009	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on unknown dates, her vehicle accelerated on its own.
2283	PRIUS	2004	10/5/2009	Customer called regarding her 2004 Toyota Prius. Specifically, customer claims that in June 2006 she was pulling into a parking lot when the vehicle began to roar and pick up speed. Customer further claims that the vehicle went over a curb and into a drainage ditch before hitting an iron gate. Customer further claims that she hit the brakes but they did not work and the vehicle only stopped because it hit the gate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2284	COROLLA	2008	10/5/2009	Customer emailed regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle experienced several instances of unintended acceleration when she did not press the gas or was coming to a stop.
2285	RX 400h	2006	10/5/2009	Customer called regarding her 2006 Lexus RX 400h. Specifically, customer claims that on an unknown date she was attempting to park when vehicle accelerated and she could not stop it and vehicle struck wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2286	ES 300	2002	10/5/2009	Customer called on an unknown date alleging that he had concerns about possible floor mat interference with the accelerator pedal.
2287	TACOMA	2005	10/5/2009	Customer called in regarding a 2005 Toyota Tacoma. The customer claims the vehicle suddenly unintentionally accelerated on 5/6/2009 which caused an accident. It is unknown if FTS inspected the vehicle. The customer claims the sudden acceleration occurred while the vehicle already in motion.
2288	LX 570	2008	10/5/2009	Customer called regarding his 2008 Lexus LX 570. Specifically, customer claims that on an unknown dates the vehicle's floor mat caused the engine to race.
2289	COROLLA	2007	10/5/2009	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on October 5, 2009 the vehicle did not stop when he applied the brakes while pulling up to a gas station pump, causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2290	TACOMA	2009	10/5/2009	Customer called about her 2009 Toyota Tacoma Prerunner Dbl Cab. Specifically, customer claims that on an October 5, 2009, her husband was driving the vehicle when the car lurched forward causing him to hit a building. Customer further claims that at the time of the accident he had his foot on the brake pedal. An FTS inspected the vehicle. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2291	CAMRY	2005	10/5/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that in October of 2006, while stationed in Korea, his vehicle accelerated in a similar way as described in the press release. Customer claims that, he pressed the brake, and put the vehicle into park to avoid a collision.
2292	CAMRY	2003	10/5/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on September 25, 2009 her vehicle accelerated in reverse while backing out of a carport, causing her to slam into a post. Customer further claims that when she put the vehicle in drive, it crashed into the front building. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was in motion.
2293	MATRIX	2009	10/6/2009	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while the customer was parking and she needed to slam on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2294	COROLLA	2006	10/6/2009	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that his wife was pulling into a parking spot when the vehicle unintentionally accelerated, causing her to knock over an HVAC unit, go through a fence and hit a tree.
2295	MATRIX	2005	10/6/2009	Customer called about his 2005 Toyota Corolla Matrix XR. Specifically, customer claims that on an unknown date, the car suddenly accelerated when he was backing up. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2296	IS250	2006	10/6/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on an unknown date, his daughters were involved in an accident that customer believes was the result of sudden acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2297	SCION TC	2005	10/6/2009	Customer called regarding her 2005 Scion TC. Customer states that on an unknown date, she removed floor mat because it was impeding the accelerator pedal.

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2298	PRIUS	2008	10/6/2009	Customer called regarding her 2008 Toyota Prius . Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2299	COROLLA	2005	10/6/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the accelerator pedal got stuck.
2300	CAMRY	2002	10/6/2009	Customer called regarding her 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date customer was moving through intersection when motor went of control and struck wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2301	CAMRY	2006	10/6/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on May 30, 2008, she was going into a driveway at 5 mph when the vehicle suddenly surged. Customer further claims that the vehicle went over a retaining wall and dropped into the yard while continuing to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2302	GS 300	2002	10/6/2009	Customer called regarding her 2002 Lexus GS 300. Specifically, customer claims that on an unknown date she had an accident and felt that the flor mats may have been the cause.
2303	ES 330	2005	10/6/2009	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on October 6, 2009, she was turning into a parking space when the vehicle accelerated and she hit the wall.
2304	MATRIX	2007	10/6/2009	Customer called regarding her 2007 Toyota Corolla Matrix STD. Specifically, customer claims that on several unknown dates, the car suddenly accelerated causing three accidents.
2305	RAV 4	2008	10/6/2009	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle lurched forward from a dead stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2306	4RUNNER	2006	10/7/2009	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that on October 6, 2009, he was driving the vehicle when it took off into an intersection and ran over an iron fence. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2307	SEQUOIA	2005	10/7/2009	Customer called regarding his 2005 Toyota Sequoia. Specifically, customer claims that his vehicle has been unintentionally accelerating because the floor mat folds underneath the accelerator.
2308	4RUNNER	2009	10/7/2009	Customer called regarding his 2009 Toyota 4Runner. Specifically, customer claims that on August 1, 2009, the accelerator became stuck. Customer further claims that her husband, who was driving the vehicle, was able to put the vehicle in neutral and pull the gas pedal up with his foot.
2309	CAMRY	2007	10/7/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has gotten into five (5) accidents which he feels have had something to do with the current recall. Customer claims that in one instance, he was unable to stop his vehicle despite depressing the brakes, which caused a collision with another vehicle. Customer further claims that in another instance, he was merging onto the highway and needed to stop his vehicle due to another vehicle stopping in front of him. However, customer claims the vehicle swerved instead of stopping.
2310	ES 350	2009	10/7/2009	Insurer called on behalf of customer regarding customer's 2009 Lexus ES 350. Specifically, customer claims that on an unknown date, her floor mat caused her gas pedal to stick, causing her to be in an accident.
2311	PRIUS	2008	10/7/2009	Customer called regarding his 2008 Toyota Prius . Specifically, the customer claims that on 10/7/2009, the vehicle unintentionally accelerated causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2312	SC 430	2005	10/7/2009	Customer called regarding his 2005 Lexus SC 430. Customer states that on an unknown date, he was backing into his garage when the vehicle suddenly sped up and hit the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2313	Venza	2009	10/7/2009	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on unknown dates, the floor mat caught on the accelerator and almost caused customer to be in 2 accidents.
2314	ES 330	2005	10/7/2009	Customer called regarding her parents' 2005 Lexus ES 330. Specifically, customer claims that on unknown dates the vehicle has been experiencing sudden acceleration.

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2315	TACOMA	2007	10/7/2009	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that he is only getting 15 miles on the gallon in his vehicle. Customer further claims that when he lets off the gas pedal, the vehicle feels as if it starts braking on its own. Customer states that when letting off the clutch or when braking, the vehicle jerks forward.
2316	PRIUS	2007	10/7/2009	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when the car in in cruise control set for 55, the speed increases to 68 when going up a hill; the speed also increases when going down a hill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2317	IS 350	2006	10/7/2009	Customer called regarding his 2006 Lexus IS 350. Specifically, customer claims that on an unknown date, he was in a car accident caused by his floor mat.
2318	CAMRY	2002	10/7/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on June 18, 2009 when parking her vehicle it lurched forward and struck another parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2319	SC 430	2005	10/8/2009	Customer called regarding his 2005 Lexus SC 430. Specifically, customer claims that on an unknown date he was backing into a garage when the vehicle suddenly sped up and struck the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2320	CAMRY	2002	10/8/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically customer claims that on October 2, 2009 while attempted to park, her gas pedal surged causing her vehicle to collide with a cement block. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2321	COROLLA	2006	10/8/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that in July 2008 she was in a bank drive through when the vehicle accelerated on its own and she was unable to stop it. Customer further claims that the vehicle crashed into a tree, causing front end damage and injuries.
2322	ES350	2007	10/8/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on October 3, 2009, she was involved in an accident she believes was due to unintended acceleration.
2323	ES 300	2002	10/8/2009	Customer called regarding her 2002 Lexus ES 300. Customer claims that while driving on March 18, 2009, her vehicle accelerated, causing her to swerve and hit a church. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2324	CAMRY	2007	10/8/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that when the vehicle is traveling at 60 miles per hour, the vehicle goes faster and slower by itself. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2325	CAMRY	2003	10/9/2009	Customer called regarding her 2003 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date vehicle's accelerator became stuck under floor mat and vehicle struck garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2326	CAMRY	2006	10/9/2009	Customer called regarding his 2006 Toyota Camry STD. Specifically, customer claims that on an unknown date, while at a light, the vehicle accelerated on its own. Customer claims that he put the foot on the brake, but the vehicle kept inching forward.
2327	CAMRY SOLARA	2005	10/9/2009	Customer called about her 2005 Toyota Camry Solara SE. Specifically, customer claims that on January 10, 2009, her daughter was driving the vehicle when it suddenly accelerated causing her to hit another car head on. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2328	COROLLA	2008	10/9/2009	Customer called regarding her 2008 Toyota Corolla. Customer claims that on unknown dates when she pressed the brake pedal the gas pedal accelerates as well. Customer alleges that she believes the cause may be the floor mat.
2329	TUNDRA	2007	10/9/2009	Customer called regarding his 2007 Toyota Tundra 4X2. Specifically, customer claims that in 2008, his foot got stuck between the gas and brake pedal, but took his foot out right away and without incident. Customer seeks to find out whether vehicle is involved in recall.
2330	CAMRY	2005	10/9/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, he was having some problems with the clips in his floor mats. Customer claims that the clips sometimes come out of the holes and the mat slides forward when he tries to break.

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2331	TUNDRA	2008	10/9/2009	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that there is a "thrust" when the vehicle is stopped. Customer further claims that the "thrust" moves the vehicle forward. Customer appears to claim that the sudden acceleration occurs while the vehicle is at a full stop.
2332	COROLLA	2006	10/10/2009	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the floor mat became stuck behind the gas pedal. Customer claims that on an unknown date when the mat was stuck, he had to pull over to the break down lane and turn the key off to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2333	ES 330	2005	10/12/2009	Customer called regarding her 2005 Lexus ES 330. Customer claims that on an unknown date, she was driving and suddenly could not stop the vehicle. Customer states that the incident occurred while the vehicle was already in motion.
2334	CAMRY	2004	10/12/2009	Customer called regarding her 2004 Toyota Camry SE (V6). Specifically, customer claims that on September 15, [2009], while backing out of the driveway, the accelerator got stuck. Customer claims that that he swerved and hit a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2335	COROLLA	2008	10/12/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on November 19, 2008 the vehicle shot backwards into a pillar when she was pulling out of a parking space with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2336	COROLLA	2009	10/12/2009	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date her accelerated jammed.
2337	CAMRY	2003	10/12/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on October 11, 2009, her accelerator got stuck.
2338	LS 460	2008	10/12/2009	Customer called regarding his 2008 Lexus LS 460. Specifically, customer claims that on an unknown date the vehicle's accelerator got stuck, causing the vehicle to strike customer's garage.
2339	TACOMA	2006	10/12/2009	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on September 24, 2009 the vehicle throttle stuck when he was backing up. Customer further claims that the vehicle accelerated when he was braking and that he ran into a brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2340	IS350	2006	10/12/2009	Customer called regarding her 2006 Lexus IS 350. Specifically, customer claims that in December 2008 her husband was involved in an accident that she believes had to do with unintended acceleration.
2341	ES 330	2004	10/12/2009	Customer called regarding his 2004 Lexus ES 330. Specifically, customer claims that on an unknown date, customer was parking vehicle and put the vehicle into park with brakes engaged when the vehicle accelerated and went through three bushes and a small embankment. An FTS inspected the vehicle.
2342	TACOMA	2009	10/12/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on October 10, 2009 the vehicle lunged forward into another vehicle when he was parking at 2 mph. Customer further claims that on August 4, 2009 the vehicle lunged forward. Customer further claims that on July 31, 2009 the vehicle experienced unintended acceleration when he was at a stop sign, and that he had to put the vehicle into neutral in order to stop it. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
2343	PRIUS	2008	10/13/2009	Customer called regarding his 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, he was traveling at 3-5 mph, put his foot on the brake, and felt the vehicle lunge forward. Customer further claims the vehicle then hit the wall of the building, and a water spigot punctured the front bumper. Customer states similar surge happened twice. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2344	TUNDRA	2005	10/13/2009	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that he is having concerns about his gas pedal sticking.
2345	PRIUS	2010	10/13/2009	Customer emailed regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while slowing to a stop, traveling at about 5 mph, the vehicle lurched forward under acceleration. Customer further claims the unintended acceleration was brief, but took the car half a car length further to stop than it should have. Customer further claims that when backing up before the engine turned on, the brakes got super sensitive; he just touched the brake pedal and the car stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2346	RX 330	2005	10/13/2009	Customer called regarding her 2005 Lexus RX 330. Specifically, customer claims that on October 9, 2009 her vehicle was in reverse and would not stop even when customer engaged brakes. Customer further claims vehicle stopped when it struck another parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2347	PRIUS	2007	10/13/2009	Customer called regarding his 2007 Toyota Prius . Specifically, the customer claims that on 8/25/09, the vehicle unintentionally accelerated into another car stopped at a red light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2348	TACOMA	2005	10/13/2009	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle jerked and accelerated even though he stepped on the brakes.
2349	HIGHLANDER	2007	10/14/2009	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claims that on October 13, 2009 the vehicle took off and accelerated into a parked vehicle when his wife was putting the vehicle in reverse. Customer further claims that the vehicle would not stop when his wife applied the brakes. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2350	COROLLA	2009	10/14/2009	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that in August of 2009, while driving on the highway, the brakes stopped working. Customer further claims on October 14, 2009, the RPMs went from 7 and 8. Customer claims that her acceleration/brake issues occurred while the vehicle was already in motion.
2351	TUNDRA	2007	10/14/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when he presses the gas pedal, the vehicle hesitates for a few seconds before it accelerates.
2352	GX 470	2008	10/14/2009	Customer called regarding his 2008 Lexus GX 470. Specifically, customer claims that on an unknown dates, occurring approximately five times, his vehicle accelerated on its own. Customer further claims that on one occasion the vehicle hopped a median and hit some shrubs. An FTS inspected the vehicle.
2353	PRIUS	2008	10/15/2009	Customer called regarding his 2008 Toyota Prius . Specifically, the customer claims that on 04/03/09, the vehicle unintentionally accelerated into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2354	ES 330	2004	10/15/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that twice, in June, 2008, and January, 2009, she pulled into a parking space and the car would not stop until she hit something. Customer further claims that the mat pushed the accelerator down and caused the problem. Customer claims that he sudden acceleration occurred while the vehicle was already in motion.
2355	AVALON	2006	10/15/2009	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on October 8, 2009, while leaving a parking space, the vehicle was spinning and only stopped once she hit a curb. The vehicle's front wheel was damaged. The vehicle was inspected by an Field Technical Specialist. Customer claims that the sudden acceleration occurred while the vehicle while the vehicle was in motion.
2356	RX 330	2005	10/15/2009	Customer called regarding his 2005 Lexus RX 330. Specifically, customer claims that on an unknown date, his wife was involved in an accident caused by the gas pedal being stuck.
2357	Camry	2007	10/15/2009	Customer emailed regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates, his accelerator got stuck. Customer further claims that he removed the vehicle's floor mat but the accelerator continued to stick. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2358	CAMRY	2007	10/15/2009	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date she was approaching a stop sign when she felt a surge and the hand brake and VSC lights came on. Customer further claims that on other unknown dates she experienced unintended acceleration randomly. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2359	SIENNA	2004	10/15/2009	Customer's insurance company called regarding customer's 2004 Toyota Sienna. Specifically, customer claims that the vehicle rear-ended another vehicle and caused an accident, and that this accident was the result of the floor mats interfering with the accelerator.
2360	GS 430	2004	10/15/2009	Customer called regarding her 2004 Lexus GS 430. Specifically, customer claims that on October 16, 2009 her vehicle surged forward violently and expelled a lot of exhaust. An FTS inspected the vehicle.

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2361	CAMRY	2007	10/16/2009	Customer called regarding her 2007 Toyota Camry. Specifically, the customer claims that she has experienced two instances of unintended acceleration. The customer claims that she first experienced the problem in December 2008, when the vehicle accelerated on its own, allegedly causing her to drive over a median. The customer claims that her second experience with the problem was in July 2009, when she was parking her vehicle and traveling at five miles per hour. The customer claims that the vehicle accelerated on its own and collided with a vehicle in front of her. A Field Technical Specialist (FTS) failed to inspect the vehicle.
2362	RAV 4	2006	10/16/2009	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on October 14, 2009 the vehicle sped up and the accelerator stuck when he was easing into a parking spot. Customer further claims that the vehicle failed to stop when he pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2363	COROLLA	2006	10/19/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates her vehicle had intermittent accelerator surging issues.
2364	GS 350	2008	10/19/2009	Customer called regarding his 2008 Lexus GS 350. Specifically, customer claims that on unknown dates the vehicle lurched forward upon acceleration.
2365	4RUNNER	2005	10/19/2009	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that in May 2009, while driving with cruise control on she accelerated to pass a truck and the accelerator stuck. Customer claims that the unintended acceleration occurred while the vehicle was already in motion.
2366	CAMRY	2010	10/19/2009	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on unknown dates, when starting the vehicle in the morning, the engine starts at 1800 rpms. Customer further claims that he hears a pump rattling sound every time he steps on the gas and puts the vehicle in the morning. Customer also claims that he hears a wind noise when driving down the freeway. Finally, Customer claims that that when he steps off the gas to move the vehicle gear, he hears the noise. A Field Technical Specialist confirmed all concerns customer was experiencing. Field Technical Specialist states that high RPM are normal operation of vehicle and the noises are all normal.
2367	ES350	2009	10/19/2009	Customer called regarding his 2009 Lexus ES 350. Specifically, customer claims that on an unknown date, he experienced unintended acceleration.
2368	CAMRY	2007	10/19/2009	Customer called regarding his 2007 Toyota Camry. Customer claims that his vehicle "wants" to spontaneously accelerate, and "wants" to move even when he does not depress the gas pedal.
2369	ES350	2009	10/19/2009	Customer called regarding his 2009 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle surged forward and he was unable to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2370	CAMRY	2008	10/19/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on October 18, 2009 the vehicle suddenly lurched and went over a fence and through some bushes and ran into a church rectory while his wife was parallel parking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2371	TUNDRA	2006	10/19/2009	Customer called regarding his 2006 Toyota Tundra 4x4. Specifically, customer claims that on October 19, 2009 his vehicle lunged forward while the customer had the brakes on. Customer further claims this caused his vehicle to strike the vehicle in front of it. The customer further claims that on an unknown later date, the vehicle's RPM jumped way up while at rest. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was at a stop.
2372	CAMRY	2005	10/19/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates he was involved in two incidents. Customer claims that the vehicle almost collided with other vehicle. Customer claims that he noticed the vehicle accelerated abruptly.
2373	TACOMA	2008	10/19/2009	Customer called regarding his 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on October 19, 2009 the vehicle's engine revved very high while he was at a red light. Customer further claims that he had to step on the brakes hard to keep the vehicle from moving. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2374	PRIUS	2007	10/19/2009	Customer called in regarding a 2007 Toyota Prius. The customer claims the vehicle unintentionally accelerated on 8/14/2009 which caused an accident. It is unknown if FTS inspected the vehicle. The customer claims the vehicle accelerated from a stop when she attempted to shift gears.

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2375	TACOMA	2008	10/20/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle would not stop while customer was driving on the freeway. Customer further claims that the brakes did not respond, that the vehicle reached a speed of 90 mph, and that he turned the ignition off and was able to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2376	ES350	2008	10/20/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on October 19, 2009, while pulling into a parking spot, the vehicle accelerated 3 feet and hit a masonry retaining wall.
2377	RX 350	2010	10/20/2009	Customer called regarding his 2010 Lexus RX 350. Specifically, customer claims that on an unknown date he was leaving a parking lot when the vehicle accelerated into the vehicle in front of him. Customer further claims that he depressed the brake but the vehicle accelerated and hit the other vehicle a second time.
2378	4RUNNER	2009	10/20/2009	Customer calims that the sudden acceleration occurred while the vehicle was already in motion. Customer called regarding his 2009 Toyota 4Runner.
2379	CAMRY	2010	10/20/2009	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on 10/13/09 she was backing out of the driveway when she took her foot off the brake and the vehicle surged, resulting in a collision. The Field Technical Specialist (FTS) inspected vehicle and could not duplicate the action. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
2380	GS 350	2007	10/20/2009	Customer called regarding his 2007 Lexus GS 350. Specifically, customer claims that on an unknown date, his vehicle unintentionally accelerated and caused him to be in an accident.
2381	CAMRY	2010	10/20/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on July 31, 2009, while pulling her vehicle into a parking lot, her brakes did not work. Customer claims that this incident occurred while the vehicle was already in motion.
2382	AVALON	2006	10/20/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on May 22, 2009 she had an accident that she believes was not related to the floor mats. Customer claims that while she was driving in reverse her brakes would not respond and she accelerated into a brick wall. Customer further claims that the sudden unintended acceleration occurred once before while her husband was driving. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2383	ES 330	2005	10/20/2009	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on an unknown date she was parked and put the car in drive when it suddenly lurched forward. Customer claims that the sudden acceleration occurred when the vehicle was at a full stop.
2384	CAMRY	2003	10/20/2009	Customer called regarding her 2003 Toyota CAMRY XLE. Specifically, customer claims that on September 28, 2009 customer's son was driving the vehicle in reverse when the pedal became stuck and the vehicle struck a well. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2385	CAMRY	2005	10/21/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates, his vehicle's throttle body is staying open.
2386	ES350	2008	10/21/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle shot forward when she started it up in the morning and placed it in first gear. Customer further claims that the same problem occurred when she put the vehicle in reverse, and that she had to keep her foot on the brakes at all times. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2387	GS 300	2006	10/21/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on four unknown dates her vehicle has surged without her control, causing one accident.
2388	CAMRY	2007	10/21/2009	Customer called regarding his 2007 Toyota Camry. Customer claims that on May 14, 2006, his wife was driving the vehicle when the car spontaneously accelerated and went into a ditch and through a fence, hitting a tree. Customer's wife was allegedly taken to the hospital. Customer suspects that the accident was due to a faulty floor mat. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2389	CAMRY	2005	10/21/2009	Customer called regarding her 2005 Toyota Camry XLE. Specifically, customer claims that on unknown dates, she has experienced concerns with throttle body staying open.
2390	ES350	2007	10/21/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, she thinks her vehicle may have accelerated unexpectedly. Customer further claims that she had multiple issues with the engine not starting when she attempted to start it. Customer claims that this issue first occurred in July 2008.

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2391	ES350	2009	10/21/2009	Customer called regarding her 2009 Lexus ES 350. Specifically, customer claims that on November 28, 2008, she was involved in an accident while pulling into a parking space. Customer claims that while she was pulling into a parking space the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2392	4RUNNER	2007	10/21/2009	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on an unknown date, she was driving on the freeway at 70 mph and the vehicle sped up to 100 mph. Customer further claims that she downshifted in order to slow the vehicle down and exit the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2393	Corolla	2009	10/22/2009	Customer claims that while driving, her vehicle's RPMs shot up to 70000. Customer further claims that the vehicle jumped forward and kept going. Customer claims that she turned her vehicle off, and started the car, and her vehicle idled at 9000. The vehicle was tested and the technician was not able to duplicate. The pedal was tested and noted return to complete idle position was not as smooth as comparable vehicles. Replaced accelerator pedal and sensor assembly for recovery and further inspection.
2394	CAMRY	2005	10/22/2009	Customer called regarding her 2005 Toyota Camry SE (V6). Specifically, customer called on behalf of her son-in-law. Caller claims that customer was involved in an accident in which he hitting a tree. Customer claims that her son-in-law died as a result of the accident. Caller claims customer's death was caused by the floor mat and unintended acceleration issues.
2395	Tacoma	2007	10/22/2009	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on an unknown date, when he slowed to 5 mph and braked, his vehicle lurched. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2396	CAMRY	2009	10/22/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on 10/22/09 he was driving in reverse out of a parking space; he hit the gas slightly and the vehicle took off, the brakes did not work and the vehicle hit a fence on his property. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2397	TACOMA	2009	10/22/2009	Customer emailed regarding his 2009 Toyota Tacoma PreRunner L/B. Specifically, customer claims that in July 2009 the vehicle's engine revved up when slowing down to turn around corners or when accelerating from a complete stop. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
2398	PRIUS	2010	10/22/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the vehicle's vsc traction lurched when going over a pot hole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2399	ES 330	2005	10/22/2009	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates vehicles continued to accelerate after his foot lets off the accelerator.
2400	CAMRY	2009	10/22/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on September 30, 2009, while slowing down to merge on an on-ramp, his vehicle failed to slow and kept accelerating. Customer claims that he hit a telephone pole and the vehicle rolled. Customer claims that that he had his foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2401	IS250	2006	10/22/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on or about three weeks prior to October 22, 2009, while her vehicle was decelerating, the RPMs stayed high.
2402	ES350	2007	10/23/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on May 21, 2009, she was involved in an accident. Customer claims that while her car was in reverse, she lightly put her foot on the gas to straighten out and it just shot forward and ran into the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2403	ES 330	2004	10/23/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date her vehicle lurched forward on its own.
2404	CAMRY	2007	10/23/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he was driving the vehicle at approximately 60 to 70 miles per hour, and that when he took his foot off the accelerator pedal the vehicle did not slow down. Customer further claims that the vehicle began to rev before slowing down. Customer claim that sudden acceleration occurred while the vehicle was already in motion.

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2405	CAMRY	2009	10/23/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on three occasions, on unknown dates, she experienced unintended acceleration. On one occasion, while on the highway, she heard a click and it stopped accelerating. On the other two occasions, customer claims that she had to smash her foot on the brake to get the vehicle to stop.
2406	CAMRY	2006	10/24/2009	Customer called regarding her 2006 Toyota Camry LE. Specifically, customer claims that on September 18, 2007, she was involved in a car accident. Customer claims that, while in reverse, the vehicle took off on its own.
2407	CAMRY	2007	10/26/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date he was stopped at a light and the engine started to rev, and when he put it in gear the vehicle lunged. Customer further claims that he has had this experience twice. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2408	AVALON	2008	10/26/2009	Customer called regarding her 2008 Toyota Avalon XLS. Specifically, customer claims that on October 24, 2009 while pulling into a parking space, she experienced sudden unintended acceleration, she used the brakes, but she damaged her vehicle. The dealer inspected the vehicle and concluded there was nothing wrong with the brake system. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2409	COROLLA	2006	10/26/2009	Customer emailed regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates when he took his foot off the gas pedal to slow down, the vehicle continued to travel at the same speed or accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2410	SIENNA	2005	10/26/2009	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that she was involved in two accidents in the vehicle, one in November 2008 and one in January 2009. Customer states that on both occasions, the accelerator sped up, causing the accidents. Customer further claims that the brakes did not stop the vehicle. Both times, customer claims that the vehicle hit a building, causing damage to the vehicle.
2411	RX 330	2004	10/26/2009	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date customer's wife was at a full stop in the vehicle when accelerator pedal became stuck, causing unintended acceleration and striking a wall.
2412	PRIUS	2010	10/27/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while braking, the vehicle jumped forward and the RPMs jumped, then the vehicle went back to normal. Customer claims he no longer feels safe to drive the vehicle. The FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2413	CAMRY	2003	10/27/2009	Customer called regarding his 2003 Toyota CAMRY LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and out of control.
2414	GS 300	2006	10/27/2009	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on an unknown date vehicle's gas pedal became stuck. An FTS inspected the vehicle.
2415	RAV 4	2009	10/27/2009	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates, when pressing accelerator, there was a delay and movement of about an inch before the engine engages and the vehicle then lurched forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2416	COROLLA	2005	10/27/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on August 14, 2009, he was pulling into a grocery store parking space at under 5 mph when he hit the brakes and the vehicle surged, causing him to hit a woman collecting shopping carts. Customer further claims that on August 24, 2009, he was in a parking lot and tried to stop the vehicle to avoid hitting a kid on a skateboard, but the vehicle surged and he hit the kid. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2417	CAMRY	2008	10/28/2009	Customer called regarding her 2008 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date the vehicle surged forward and ran into his garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2418	TACOMA	2006	10/28/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims that he has a reoccurring idle issue and the vehicle unintentionally accelerates at nonspecific times. FTS did not inspect the vehicle. The customer further claims that the issues occur at idle and while moving.

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2419	SIENNA	2007	10/28/2009	Customer wrote regarding her 2007 Toyota Sienna. Specifically, customer claims that on October 17, 2009, she was pulling into a parking space at approximately five (5) miles per hour when she felt that his van suddenly accelerated. Customer further claims that despite pressing the brake to the floor, the vehicle did not stop until it collided with another vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2420	CAMRY	2006	10/28/2009	Customer called regarding her 2006 Toyota Camry XLE. Specifically, customer claims that on while waiting in a line of cars, her vehicle revved and jumped forward and slammed him into the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was in stop-and-go traffic.
2421	PRIUS	2008	10/28/2009	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on October 26, 2009, as she was getting on expressway, another vehicle cut her off, so she had to accelerate, but the vehicle kept accelerating and would not slow down. Customer claims that eventually the vehicle slowed down. Customer further claims that on the same day, she was at a stop light and the vehicle jumped 6-7 inches, but did not go through the intersection. Customer claims that the sudden acceleration occurred both while the vehicle was already in motion and when the vehicle was at a full stop.
2422	HS 250h	2010	10/28/2009	Customer called regarding his 2010 Lexus HS 250h. Specifically, customer claims that on unknown dates the vehicle lurched ten to twelve feet with the slightest pressure on the accelerator.
2423	ES 350	2007	10/28/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, her vehicle suddenly accelerated and she had to press the brakes really hard to slow the vehicle down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2424	TACOMA	2006	10/28/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's accelerator got stuck wide open and that the vehicle has had a persistent idling problem.
2425	ES350	2007	10/28/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, she has had some concerns with the vehicle accelerating.
2426	CAMRY	2007	10/29/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle hesitated and jerked while driving.
2427	YARIS	2007	10/29/2009	Customer called regarding her 2007 Toyota Yaris. Specifically, customer claims that in 2007, her vehicle sped up and would not stop. Customer claims that she has not had this problem since then.
2428	AVALON	2007	10/29/2009	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on that on an unknown date, his vehicle accelerated causing him to run into the rear end of another vehicle. Customer was advised to remove his floor mats. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2429	Camry	2007	10/30/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date, his vehicle continued to accelerate when the customer tried to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2430	COROLLA	2009	11/2/2009	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on October 30, 2009, she turned vehicle on and the vehicle started to bounce. Customer further claims that on an unknown date her daughter started the vehicle and it lunged while still in park. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2431	ES350	2007	11/2/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, she was pulling into the driveway when the vehicle accelerated into her garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2432	PRIUS	2009	11/2/2009	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2433	CAMRY	2010	11/2/2009	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 10/31/09 the vehicle jerked while pressing on the gas pedal. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
2434	TUNDRA	2006	11/2/2009	Customer called regarding his 2006 Toyota TUNDRA 4X2. Specifically, customer claims that on an unknown date customer applied brakes but vehicle accelerated by itself causing vehicle to strike garage.

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2435	HIGHLANDER	2008	11/2/2009	Customer called regarding her 2008 Toyota Highlander . Specifically, the customer claims that on 10/30/09, the vehicle unintentionally accelerated while backing out of a driveway causing an accident with a wall/pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2436	AVALON	2006	11/2/2009	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that after hearing the reports in the news, he believes that an accident involving his vehicle that occurred in June 2008 while parking was related to the current recall. Customer claims that his vehicle accelerated and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2437	IS250	2008	11/2/2009	Customer called regarding his 2008 Lexus IS 250. Specifically, customer claims that on the Saturday evening prior to November 2, 2009, he experienced sudden acceleration. Customer claims that he hit a tree in order to stop the vehicle. Customer further claims that when he tried to back up the vehicle, the minute he put it back in gear he hit a tree again. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2438	ES350	2008	11/2/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on October 21, 2009 the vehicle lurched forward while she was stopped at a red light, causing her to hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2439	TACOMA	2005	11/2/2009	Customer called regarding his 2005 Toyota Tacoma PreRunner. Specifically, customer claims that on October 29, 2009 the vehicle started accelerating while his wife was driving. Customer further claims that his wife had to turn the engine off and run into a cement pole to stop the vehicle, because the brakes would not work. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2440	COROLLA	2009	11/2/2009	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on two occasions, on unknown dates, vehicle experienced sudden acceleration. Customer claims that she pressed her foot on the brake, and the vehicle stopped.
2441	PRIUS	2005	11/3/2009	Customer called regarding her 2005 Toyota Prius . Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2442	CAMRY	2007	11/3/2009	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he/she is experiencing instances of unintended acceleration. Customer states that the vehicle jerks forward and accelerates when it is idling and customer is not pressing on the gas pedal.
2443	COROLLA	2009	11/3/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on October 29, 2009, while changing lanes on the expressway, her vehicle's gas pedal became stuck and the vehicle began to idle high. Customer claims that she pulled to the side of the road and got the vehicle in neutral.
2444	TACOMA	2008	11/3/2009	Customer called regarding his 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle's engine revved up while his wife was driving it on the highway. Customer further claims that his wife was able to stop the vehicle by applying the brakes, but that the engine remained revved up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2445	PRIUS	2010	11/3/2009	Customer called regarding her 2010 Toyota Prius . Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the jerk acceleration occurred while the vehicle was already in motion.
2446	COROLLA	2007	11/3/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle increased in speed when she took her foot off the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2447	AVALON	2009	11/3/2009	Customer called regarding his 2009 Toyota Avalon Limited. Specifically, customer claims that on that on or about the week before November 3, 2009 while his was driving the brakes would not stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2448	CAMRY	2003	11/3/2009	Customer called regarding his 2003 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date his vehicle would not stop until he applied the brakes and turned off his vehicle.
2449	COROLLA	2009	11/3/2009	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on October 31, 2009, her daughter was driving and when she started to put the vehicle in park the vehicle jumped forward over the curb. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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2450	SIENNA	2004	11/3/2009	Customer called regarding 2004 Toyota Sienna. Specifically, customer claims that she was backing out of her driveway slowly when the vehicle took off "like a bullet." Customer claims that she was able to stop the vehicle without hitting anything. Customer further claims that the vehicle's floor mats were secured during the incident. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2451	ES 300	2002	11/3/2009	Customer called regarding her husband's 2002 Lexus ES 300. Specifically, customer claims that on unknown dates she may have had a couple of incidents with the accelerator having a sudden spurt of speed.
2452	CAMRY	2010	11/3/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date, when she first purchased her vehicle, she experienced some acceleration issues.
2453	PRIUS	2004	11/3/2009	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on 10/28/09, the vehicle unintentionally accelerated almost hitting a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2454	COROLLA	2007	11/3/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on November 2, 2009, the vehicle unintentionally accelerated, causing her to hit the garage door. Customer further claims that she put the vehicle in neutral and slammed on the brakes to stop the vehicle. A Field Technical Specialist inspected the vehicle.
2455	PRIUS	2010	11/3/2009	Customer called regarding her 2010 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle was bucking and jerking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2456	IS250	2008	11/3/2009	Customer called regarding her 2008 Lexus IS 250. Specifically, customer claims that on an unknown date, while driving the vehicle, it felt like it was on cruise control and it would not stop. Customer claims that she put the vehicle in neutral and it slowed down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2457	CAMRY	2004	11/3/2009	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on March 16, 2009, while parking his vehicle, with his foot on the brake, the vehicle began to speed up. Customer claims that the vehicle jumped the curb and she applied both of her feet to the brake.
2458	RAV 4	2008	11/3/2009	Customer called regarding his 2008 Toyota Rav4. Specifically, customer claims that his wife has experienced vehicle accelerations even while her foot is on the brake pedal.
2459	LX 470	2006	11/3/2009	Customer called regarding her 2006 Lexus LX 470. Specifically, customer claims that on January 31, 2009 she exited a car wash and was driving slowly when her vehicle accelerated on its own, striking a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2460	YARIS	2007	11/3/2009	Customer called regarding his 2007 Toyota Yaris. Specifically, customer claims that the floor mats in his vehicle caused the vehicle to accelerate. Customer further claims that he found out the vehicle had been sent to him with the wrong floor mats. Customer advises that the issue was resolved.
2461	4RUNNER	2006	11/3/2009	Customer called regarding her 2006 Toyota 4Runner. Customer claims that in June 2009, she was driving on the highway and had pressed the accelerator to go up a steep hill when the vehicle took off. Customer further claims that she pulled back the floor mat then pumped the accelerator and the vehicle began to decelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2462	COROLLA	2005	11/3/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the gas pedal got stuck and the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2463	4RUNNER	2008	11/3/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on unknown dates he experienced spontaneous acceleration, and that he was able to slow down and stop by pounding on the brake. Customer further claims that the acceleration occurred as he was trying to slow down when coming to an intersection. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2464	GS 300	2001	11/3/2009	Customer called regarding his 2001 Lexus GS 300. Specifically, customer claims that on unknown dates intermittently his vehicle accelerated and jumped forward.
2465	IS250	2009	11/3/2009	Customer called regarding her 2009 Lexus IS 250. Specifically, customer claims that on unknown dates and on two separate instances, the vehicle accelerated on its own. Customer claims that this happened once while the floor mats were in and once while the floor mats were removed.

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2466	RX 400h	2008	11/3/2009	Customer called regarding her 2008 Lexus RX 400h. Specifically, customer claims that on an unknown date, she was involved in a collision with a concrete barrier when the vehicle accelerated in a parking structure.
2467	ES 330	2005	11/4/2009	Customer called regarding her 2005 Lexus ES 330. Specifically, customer claims that on an unknown date her husband was entering an expressway when he said that the vehicle would not stop. Customer further claims that the husband applied the brake and the vehicle eventually stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2468	AVALON	2007	11/4/2009	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jerked and took off on its own.
2469	CAMRY	2002	11/4/2009	Customer called regarding his 2002 Toyota LE. Specifically, customer claims that on March 16, 2007 he applied his brakes and his vehicle accelerated into another vehicle. Customer further claims that the vehicle occasionally jerks forward a little.
2470	HIGHLANDER	2008	11/4/2009	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2471	RAV 4	2008	11/4/2009	Customer called regarding her 2008 Toyota Rav4. Specifically, customer claims that her gas pedal sticks in her vehicle. Customer further claims that she was getting on the highway and stepped on the gas pedal when the gas pedal became stuck. Customer states that she stepped on the brake pedal, but that the vehicle would not stop. Customer claims that the vehicle did this again twice on the same highway. Customer claims that she had to pull the gas pedal up with her toe in order to stop the engine. Customer claims that unintended acceleration occurred while the vehicle was already in motion.
2472	CAMRY	2009	11/4/2009	Customer called about his 2009 Toyota Camry LE. Specifically, customer claims that he has concerns with not being able to stop vehicle. This sudden acceleration occurred when the vehicle was already in motion.
2473	ES 330	2006	11/4/2009	Customer called regarding his 2006 Lexus ES 330. Specifically, customer claims that on September 21, 2009, he was parking the vehicle and it unintentionally accelerated. Customer further claims the brakes were unresponsive. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2474	GS 300	2006	11/4/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date the car accelerated on its own to 15 mph above what the driver intended. Customer further claims the car stopped after the driver placed the vehicle in neutral and turned off the engine. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2475	GS 300	2006	11/4/2009	Customer called regarding his 2006 Lexus GS 300. Customer claims that on an unknown date, his wife was parking the vehicle in a parking lot, and when she attempted to place the vehicle in park, the accelerator became stuck and the vehicle crashed into a building. Customer claims the sudden acceleration occurred while the vehicle was at a full stop.
2476	COROLLA	2006	11/4/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date she was backing up and when she put her foot on the gas pedal, the vehicle accelerated.
2477	CAMRY	2003	11/4/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that for about a year and a half the car had made sudden surges.
2478	RAV 4	2009	11/4/2009	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle unintentionally accelerates at random times, but failed to specify a specific incident. FTS did not inspect the vehicle. Further, the customer claims that the acceleration occurs while the vehicle is already in motion.
2479	VENZA	2009	11/4/2009	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on unknown dates the vehicle experienced two instances of unintended acceleration. Customer further claims that he was concerned by news reports.
2480	HIGHLANDER	2005	11/4/2009	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle hesitated before accelerating when pushing on the accelerator, and then accelerated on its own. Customer further claims that this happened once per week.

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2481	CAMRY	2009	11/4/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle had three instances of unintended acceleration. Customer further claims that on the first incident the vehicle accelerated out of control when the floor mat got stuck. Customer further claims that in the second accident the vehicle's accelerator got stuck and the vehicle surged quickly when his wife was turning around in their driveway, causing her to run into another vehicle. Customer further claims that the vehicle took off when his wife was driving down the road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2482	PRIUS	2005	11/4/2009	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2483	CAMRY	2005	11/4/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, customer experienced problems with his brakes.
2484	CAMRY	2008	11/4/2009	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged forward while in cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2485	CAMRY	2002	11/4/2009	Customer's wife called regarding customer's 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle was involved in several accidents due to unintended acceleration
2486	COROLLA	2009	11/4/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates, she had some concerns regarding unintended acceleration. Customer claims that the issue occurs intermittently.
2487	TACOMA	2005	11/4/2009	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date the vehicle surged backwards into a wall when he was backing the vehicle up to a dock. Customer further claims that on an unknown date two weeks later the vehicle surged and struck another vehicle when he let off the brakes while pulling into a gas station. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2488	AVALON	2006	11/4/2009	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, the customer noticed the her vehicle accelerates too fast. CSA found that the concern was due to incompatible floor mats or unsecured floor mats.
2489	Camry	2003	11/4/2009	Customer emailed regarding her 2003 Toyota Camry. Specifically, customer claims that on unknown dates, she experienced uncontrolled acceleration.
2490	CAMRY	2007	11/4/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on March 30, 2009, she was pulling into a parking space when the vehicle lurched forward, went over the barrier and hit the wall of the building several times, bouncing forward and backward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2491	PRIUS	2006	11/4/2009	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle surged on him. Customer further claims that on one occasion when the vehicle surged he stood on the brake and pushed the vehicle start button.
2492	CAMRY	2002	11/4/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date she was coming off an overpass when the vehicle began to accelerate. Customer further claims that she jumped a curb and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2493	CAMRY	2002	11/4/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on October 24, 2009 she was driving when the vehicle accelerated on its own, jumped a curb and struck a tree. Customer claims she was unable to slow or stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2494	AVALON	2006	11/4/2009	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that in 2008 while stopped at a yield sign, her vehicle accelerated and she hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a stop.
2495	HIGHLANDER	2008	11/4/2009	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2496	PRIUS	2010	11/4/2009	Customer called regarding her 2010 Toyota Prius. Specifically, the customer claims that on an unknown date, the vehicle unintentionally accelerated when making right turns. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2497	CAMRY	2009	11/4/2009	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on approximately 10/23/09 she was traveling 65-70 mph and began to pass another vehicle; once she was past, the vehicle surged. She put the car in neutral and turned off the engine, but it continued to surge for two minutes, when it finally stopped on its own. Customer further claims her floor mats are secured, not loose. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2498	CAMRY	2007	11/4/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle's accelerator surged.
2499	Tundra	2006	11/4/2009	Attorney wrote on behalf of Customer. Specifically, customer claims that on January 17, 2009, he was pulling into a parking spot when the vehicle accelerated by itself, causing it to crash into the front of a business. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2500	CAMRY	2007	11/4/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date he experienced the vehicle surging forward.
2501	CAMRY	2002	11/4/2009	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on August 7, 2009, he was putting the car into reverse when the vehicle accelerated on its own and hit a post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2502	CAMRY	2006	11/4/2009	Customer called regarding her 2006 Toyota Camry LE. Specifically, customer claims that on an unknown date, while she was not driving fast, she applied the brakes but they failed to work. Customer claims that it caused her to drive through a building.
2503	CAMRY	2005	11/4/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that in April of 2007, while idling in front of her driveway, her vehicle jumped forward and hit another car and garage. Customer claims that the sudden acceleration occurred while the vehicle was stopped.
2504	COROLLA	2005	11/4/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on August 1, 2009, he was driving about 35-40 mph when the vehicle started wobbling and he applied the brakes, but he could not stop the vehicle, causing him to hit two parked vehicles and a house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2505	AVALON	2006	11/4/2009	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle has had four instances of surging. Customer further claims that in the most recent incident the vehicle accelerated when she pressed the brakes while pulling out of a parking lot. Customer further claims that each incident occurred while she was wearing her therapeutic shoes, and that since she has stopped wearing the shoes there have not been any more incidents. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2506	ES 330	2004	11/4/2009	Customer called regarding her 2004 Lexus ES 330. Customer claims that on unknown dates, she experienced sudden acceleration.
2507	CAMRY	2003	11/4/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on January 7, 2010, she was pulling into her garage at 5 mph and applied the brakes, and the vehicle accelerated and hit the house. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2508	LAND CRUISER	2004	11/4/2009	Customer called regarding his 2004 Toyota Land Cruiser. Specifically, customer claims that in July 2009 the vehicle kept accelerating after he pressed the gas pedal to the floor and then let up. Customer further claims that he used his foot to lift the pedal.
2509	AVALON	2005	11/4/2009	Customer called regarding her 2005 Toyota Avalon XL. Specifically, customer claims that on unknown dates she had been experiencing acceleration issues. Customer was advised to visit the dealer.
2510	HIGHLANDER	2005	11/4/2009	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle accelerated when driving on the freeway, and that she is able to slow the vehicle down by applying the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2511	HIGHLANDER	2005	11/4/2009	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle went forward into her garage door when she put it in reverse. Customer further claims that there have been three other incidents of unintended acceleration.
2512	CAMRY	2009	11/4/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on November 13, 2008 the vehicle had an acceleration event when she was parking. Customer further claims that on November 3, 2009 the vehicle gunned itself and hopped the parking block and accelerated into a building. A Field Technical Specialist (FTS) inspected the vehicle.

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2513	RAV 4	2008	11/4/2009	Customer called regarding his 2008 Toyota Rav4. Specifically, customer claims that his vehicle has suddenly accelerated on a number of occasions. Customer claims that he stops the vehicle by pressing hard on his brake pedal and putting the vehicle into neutral. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2514	ES350	2007	11/4/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, she experienced sudden acceleration and she applied the brakes but vehicle would not slow down. Customer further claims that when she placed the vehicle in neutral, the vehicle drove normally.
2515	CAMRY	2003	11/4/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that he was unable to keep the vehicle under control by continuing to step on the brakes.
2516	ES 300	2003	11/4/2009	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on an unknown date while pulling into his driveway the vehicle accelerated. Customer further claims that when he put the vehicle in park it continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2517	CAMRY	2007	11/4/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date he applied the brakes and heard a clunking noise, and the vehicle throttled up and almost hit the vehicle in front of him.
2518	ES350	2007	11/4/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, her vehicle accelerated and hit a tree and three other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2519	TUNDRA	2006	11/4/2009	Customer called regarding his 2006 Toyota Tundra 4x2. Customer claims that on an unknown date, he was in a parking lot when the vehicle went to 5000 RPM, causing him to have to swerve past other vehicles before putting vehicle into neutral and shutting it off.
2520	CAMRY	2007	11/4/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle accelerated unintentionally, after which he put his foot on the brake and shifted gear into neutral to stop the vehicle. Customer further claims that his vehicle accelerated up to approximately 25 miles per hour. Customer claims that the sudden acceleration occurred while the vehicle was already in motion. Customer also claims that his vehicle has spontaneously accelerated several times.
2521	ES350	2007	11/4/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, he experienced sudden spurts of acceleration on his vehicle.
2522	RX 350	2008	11/4/2009	Customer called regarding her 2008 Lexus RX 350. Specifically, customer claims that her prior vehicle exhibited unintended acceleration that caused an accident.
2523	IS250	2007	11/4/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, her vehicle sped on its own until she put the vehicle in park.
2524	CAMRY	2007	11/4/2009	Customer called regarding her 2007 Toyota Camry. Customer claims that she has been having "acceleration issues" with her vehicle and would like to know more about the floor mat "recall."
2525	CAMRY	2005	11/4/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, while driving, she was about to park when all of the sudden she collided with a metal pole.
2526	AVALON	2006	11/5/2009	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, the vehicle was going faster than it should. Customer was advised to have the vehicle inspected.
2527	TACOMA	2004	11/5/2009	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims that his accelerator pedal often gets stuck. Customer further claims that he is afraid to drive the vehicle because of the problem.
2528	CAMRY	2010	11/5/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged a lot. Customer further claims that on November 4, 2009 the vehicle just flew when she stepped on the gas.
2529	COROLLA	2006	11/5/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date, her daughter was driving and after stopping at a stop sign, the vehicle moved. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2530	CAMRY	2008	11/5/2009	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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2531	CAMRY	2002	11/5/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that in Septmeber, 2009, his wife was pulling up to a bank when the vehicle surged forward, she took out a pole, nearly hit an SUV and continued around a building and almost went to a 6-lane highway. Customer further claims that an indident occurred in October, 2008, when his wife could not get the vehicle to stop. Customer claims that the sudden accleration occurred while the vehicle was already in motion.
2532	Venza	2009	11/5/2009	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on November 4, 2009, his wife put the vehicle into reverse with her foot on the brake and the vehicle suddenly accelerated, causing it to strike a tree. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2533	PRIUS	2010	11/5/2009	Customer called regarding his 2010 Toyota Prius. Specifically, customer claims that on two unknown dates the vehicle surged when he accidentally pressed down both the gas and brake pedals. Customer further claims that the two pedals are too close together.
2534	CAMRY	2005	11/5/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle accelerated at a busy intersection.
2535	VENZA	2009	11/5/2009	Customer called regarding 2009 Venza. Specifically, customer claims that she is very worried about the ABC News article. Customer further claims that she feels as if her vehicle jumps or surges when she tries to accelerate quickly after decreasing her speed to approximately 20 miles per hour.
2536	TACOMA	2006	11/5/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on November 4, 2009 the vehicle hissed and lunged forward when he was coming to a stop, causing him to run into the vehicle in front of him. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2537	CAMRY	2009	11/5/2009	Customer called regarding her 2009 Toyota Camry. Specifically, a caller from Enterprise Claims, claims that customer in a rented vehicle unintentionally accelerated. Customer claims that that the Enterprise customer's vehicle accelerated off the road, causing a collision, resulting in the death of the driver. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2538	PRIUS	2010	11/5/2009	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while braking to come to a stop, the vehicle jumped forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2539	PRIUS	2008	11/5/2009	Customer called regarding her 2008 toyota Prius Hybrid. Specifically, customer claims that on October 28, 2009, while slowing down at an intersection, she tapped the gas pedal, and the vehicle lurched forward and she hit the passenger side bumper of another vehicle. FTS inspected vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2540	CAMRY	2002	11/5/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle exhibited unintended acceleration.
2541	TACOMA	2004	11/5/2009	Customer called regarding his 2004 Toyota TACOMA PRERUNNER. Specifically, customer claims that on an unknown date he was turning into a driveway when the vehicle accelerated while Customer applied brakes. Customer further claims that on another unknown date, he applied the brakes and the vehicle accelerated.
2542	SIENNA	2006	11/5/2009	Customer called regarding 2006 Toyota Sienna. Specifically, customer claims that on two (2) occasions, the vehicle kept accelerating on its own. Each time customer states that the vehicle was stopped without incident.
2543	CAMRY	2002	11/5/2009	Customer called regarding her 2002 Toyota CAMRY XLE. Specifically, customer claims that on unknown dates her vehicle accelerated on its own.
2544	CAMRY	2005	11/5/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on January 26, 2007, she parked her vehicle and then it moved on its own. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2545	PRIUS	2005	11/5/2009	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle has accelerated on its own a few times. Customer further claims that the vehicle periodically surged forward when she pressed the gas pedal while going at 30 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2546	COROLLA	2009	11/5/2009	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, while his wife was stopped on the on-ramp to a highway, the vehicle unintentionally accelerated causing his wife to rear end another vehicle. Customer claims that his wife tried to apply the brakes, but the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2547	PRIUS	2009	11/5/2009	Customer called regarding his 2009 Toyota Prius Hybrid. Specifically, customer claims that on October 8, 2009 and approximately a week later, while sitting at a stop light, the vehicle suddenly wanted to surge forward, and he noticed that the arrows on the energy monitor screen light up. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2548	COROLLA	2007	11/5/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the engine revved up and the accelerator pedal got stuck.
2549	CAMRY	2009	11/5/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on August 8, 2009, when she moved the vehicle from park to reverse, with her foot off the accelerator pedal, the vehicle accelerated on its own. Customer claims that she put her foot on the brakes, but the brakes would not work.
2550	CAMRY	2005	11/5/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that on unknown dates, she had accelerator issues. Customer claims that the vehicle accelerates faster than it should.
2551	Corolla	2006	11/5/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on two unknown dates, she was in accidents in her vehicle. Customer further claims that in one instance, her vehicle accelerated by itself as she backed out of a parking spot, causing the vehicle to collide with a gas pipe and side-swipe several other parked vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2552	PRIUS	2009	11/5/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when vehicle was in park for 10 minutes, vehicle tried to lunge forward, and that she thought the vehicle engine was going on and off. Customer claims it felt like someone is hitting the vehicle from behind, lunging her forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2553	PRIUS	2008	11/5/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on 11/5/09, the vehicle unintentionally accelerated while idling in a garage and backed out into their yard. FTS failed to inspect vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2554	TUNDRA	2003	11/5/2009	Customer called regarding his 2003 Toyota TUNDRA SR5. Specifically, customer claims that on July 3, 2009 the vehicle accelerated from 55 mph to an unknown higher speed. Customer claims he applied brakes but had no control and vehicle struck cement ramp. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2555	LAND CRUISER	2000	11/5/2009	Customer called regarding his 2000 Toyota Land Cruiser. Specifically, customer claims that on unknown dates the vehicle surged when approaching a stop light or stop sign, even when he pressed down on the brake pedal.
2556	PRIUS	2010	11/5/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, on three separate incidences, the vehicle accelerated by itself while going downhill and hitting an uneven part of the road such as a pothole, and then corrected itself when braking. Customer claims this happened in the D mode, not the B mode. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2557	CAMRY	2002	11/5/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date her vehicle seemed to experience unintended acceleration.
2558	CAMRY	2004	11/5/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates, on more than one occasion her vehicle suddenly accelerated. On one occasion, while attempting to make a left turn, the vehicle accelerated to approximately 80 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2559	TUNDRA	2006	11/5/2009	Customer called regarding 2006 Toyota Tundra 4x4. Customer claims that on August 2, 2009, vehicle went out of control and through a fence.
2560	SIENNA	2009	11/5/2009	Customer called regarding her 2009 Toyota Sienna. Customer claims that she heard about the floor mat concern and states that she had the same concern in a 1971 Corolla. Customer further claims that she was not involved in any accident.

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2561	SEQUOIA	2004	11/5/2009	Customer called regarding her 2004 Toyota Sequoia. Specifically, customer claims that when she pushes on the gas and the vehicle is traveling at 45 to 65 miles per hour, the vehicle jumps ahead. Customer further claims that she has to engaged the brakes to slow the vehicle. Customer claims that the vehicle also jerks at times when going around turns. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
2562	CAMRY	2010	11/5/2009	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 8/4/09 the vehicle surged forward. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
2563	CAMRY	2008	11/5/2009	Son called regarding customer's 2008 Toyota Camry. Customer does not state specifics, but fears that his mother's life is in danger.
2564	Solara	2002	11/5/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on November 4, 2009 she was pulling into a parking spot with her foot on the brake when the vehicle surged forward and struck a shed. An FTS inspected the vehicle.
2565	PRIUS	2007	11/5/2009	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on 10/10/08, the vehicle unintentionally accelerated causing a frontal collision. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2566	AVALON	2008	11/5/2009	Customer called regarding his 2008 Toyota Avalon Limited. Specifically, customer claims that in 2008, the vehicle was involved in a collision, where the vehicle jumped the curb and ran into a beauty parlor. The customer does not know if the accident was caused by unintended acceleration.
2567	CAMRY	2003	11/5/2009	Customer called regarding her 2003 Toyota CAMRY LE. Specifically, customer claims that on an unknown date she was attempting to park her vehicle with her foot on the brake when the vehicle accelerated and kept going, coming to rest on an embankment.
2568	CAMRY	2005	11/5/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 3, 2009, while backing out of her driveway, the vehicle accelerated on its own and drug a family member alongside the vehicle. Customer further claims that the vehicle hit a bystander and caused injuries.
2569	AVALON	2009	11/5/2009	Customer called regarding his 2009 Toyota Avalon Limited. Specifically, customer claims that on that on November 4, 2009 he and his wife were involved in an accident in front of a school. Customer claims that vehicle accelerated suddenly and went up a hill and ran into a bush before coming to a stop. A Field Technical Specialist inspected the vehicle and forwarded the results to legal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2570	PRIUS	2004	11/5/2009	Customer called regarding his 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2571	CAMRY	2007	11/6/2009	Customer called regarding his wife's 2007 Toyota Camry. Customer claims that he experienced two instances of unintended acceleration. In November 2009, customer called regarding the first incident. Customer claims that he was driving and that he stopped for a stop sign, after which the vehicle accelerated spontaneously. Customer claims that he was able to stop the vehicle and thought that the floor mats were at fault for the issue. In January 2010, customer called again regarding a second incident. Customer claims that the vehicle again experienced an instance of unintended acceleration, and that the floor mats were not present in the vehicle at the time.
2572	IS250	2006	11/6/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on unknown dates, she had numerous concerns with random accelerations. Customer claims that the vehicle accelerates without any reason.
2573	PRIUS	2005	11/6/2009	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2574	CAMRY	2007	11/6/2009	Customer called regarding his wife's 2007 Toyota Camry. Customer claims that his wife was driving the vehicle and was making a u-turn when the vehicle spontaneously accelerated despite depression of the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2575	CAMRY	2009	11/6/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date, she had some concerns with acceleration. Customer further claims that on one occasion, the brake got stuck and the vehicle would not steer properly and she could not get the vehicle to slow down.
2576	TUNDRA	2006	11/6/2009	Customer called regarding his 2006 Toyota TUNDRA 4X2. Specifically, customer claims that on an unknown date his vehicle began to speed up and customer applied both feet onto the brake pedal.

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2577	CAMRY	2005	11/6/2009	Customer called regarding her 2005 Toyota Camry XLE (V6). Specifically, customer claims that on two different occasions, she was involved in an accident. On one occasion, in February 2009, an accident occurred while coming to a park.
2578	AVALON	2006	11/6/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date his vehicle accelerated even though he had removed the floor mats.
2579	PRIUS	2005	11/6/2009	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on 10/5/09, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2580	CAMRY	2009	11/6/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date, she was stopped for speeding when she knew she was not speeding. Customer claims that on that occasion, she was going faster than how fast she thought she was going.
2581	CAMRY	2007	11/6/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date, her vehicle accelerated and she could not stop her vehicle. Customer further claims that when she stopped the vehicle, she noticed that the floor mat was very far under the brake and gas pedals. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2582	COROLLA	2009	11/6/2009	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown date, she had some concern with her vehicle. Customer claims that when the temperature is cooler, the vehicle travels at low speeds. Customer further claims she feels like her vehicle is going faster without pressing on the gas.
2583	AVALON	2006	11/6/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while driving with her sister, she tried to apply the brakes and the vehicle sped up and then stopped. There was no damage to the vehicle.
2584	PRIUS	2008	11/6/2009	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2585	Avalon	2008	11/6/2009	Customer emailed regarding his 2008 Toyota Avalon. Specifically, customer claims that on unknown dates, his vehicle would not slow down when he removed his foot from the gas pedal. Customer further claims that the acceleration was caused by the floor mat and by the plush carpet. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2586	ES350	2007	11/6/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on November 5, 2009 the vehicle surged forward while she was pulling into a parking spot. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2587	AVALON	2005	11/6/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that she has experienced the vehicle leaping and feels like the accelerator is rough. Customer further claims that the condition has occurred more frequently in the past year.
2588	RAV 4	2009	11/6/2009	Customer emailed regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown date, while pulling into a parking place in front of a convenience store with his foot on the brake, the car suddenly accelerated. Customer claims he had to stand on the brake to keep the vehicle from driving into the store, and that it was not a stuck floor mat or a case of accidentally stepping on the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2589	CAMRY	2007	11/6/2009	Customer called regarding her 2007 Toyota Camry. Customer claims that she had been experiencing unintended acceleration and that the dealer had to reset the internal computer twice before because the vehicle had acceleration problems.
2590	LS 400	1998	11/6/2009	Customer called regarding 1998 Lexus LS 400. Customer claims that on October 25, 2009, his vehicle backed up out of control and hit another vehicle. Customer claims the brakes would not stop the vehicle.
2591	CAMRY	2002	11/6/2009	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims on unknown dates the vehicle surged at highway speeds. Customer further claims that the vehicle will not continue at a constant speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2592	CAMRY	2005	11/6/2009	Customer called regarding her 2005 Toyota Camry LE. Specifically, customer claims that at the end of September [2009], she had a surging incident. Customer claims similar incidents occurred on more than one occasion.
2593	PRIUS	2010	11/6/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle unintentionally accelerated on 11/6/2009 causing a non-injury wreck. FTS inspected the vehicle but took no action. The customer further claims the acceleration occurred while the vehicle was stopped.

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2594	VENZA	2009	11/6/2009	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on an unknown date the vehicle experienced an instance of unwanted acceleration. Customer further claims that he was able to stop the vehicle after numerous attempts at braking and that there was no accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2595	LAND CRUISER	2008	11/6/2009	Customer called regarding her 2008 Toyota Land Cruiser. Specifically, customer claims that on an unknown date the vehicle took off to 100 mph while she was driving on the highway and punching the brakes. Customer further claims that the vehicle made a popping noise and slowed down by itself. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2596	CAMRY	2009	11/6/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 11/6/09 she was driving approximately 10-15 mph and hit brakes as she approached a stop sign, at which point the accelerator engaged and the car jerked forward like the brakes were fighting with the accelerator. Her vehicle then hit the vehicle in front of her. Customer further claims her vehicle has no floor mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2597	COROLLA	2009	11/7/2009	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates he experienced unintended acceleration. Customer further claims that the cruise control light came on two times when the vehicle would randomly accelerate. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
2598	CAMRY	2002	11/7/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on May 10, 2007, as she was backing out of a parking space, she tapped the gas pedal and the car took off like a rocket and lunged forward into a large trash can. Customer further claims that the trash can stopped her from crashing into a store window. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2599	CAMRY	2007	11/7/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her vehicle has failed to stop while she was driving on several occasions. Customer further claims that the vehicle would not stop in the snow.
2600	PRIUS	2007	11/7/2009	Customer emailed regarding her 2007 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle had small surges in speed from time to time and only for a second or two.
2601	Camry	2009	11/9/2009	Customer claims that engine surges at 1200 RPM. Vehicle inspected and customer's concern confirmed. Found that condition goes away when OCV is unplugged. Cylinder head assembly replaced.
2602	Tundra	2007	11/9/2009	An FTR from the U.S., issued on November 9, 2009, concerning a 2007 Toyota Tundra, states that a customer complained that the gas pedal was hard to push at times. The pedal was tested by pushing it by hand. The gas pedal was replaced.
2603	CAMRY	2007	11/9/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates when driving on the highway, when customer sped up to pass another vehicle, the vehicle choked and then took off. Customer further claims that on unknown dates when stopped at a red light with his foot on the brake, the vehicle revved up. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
2604	SIENNA	2004	11/9/2009	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that her vehicle has suddenly accelerated several times. Customer further claims that she has had the electronic idle control replaced but that the problem still occurs. Customer claims that recently she was driving in a school zone when her vehicle accelerated despite the fact that she took her foot off the accelerator. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
2605	CAMRY	2002	11/9/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on an unknown date around April of 2007, her vehicle was at a full stop when it abruptly accelerated and struck another vehicle.
2606	CAMRY	2006	11/9/2009	Customer called regarding his 2006 Toyota Camry XLE (V6). Customer claims that on August 22, [2009], while parking this vehicle, it lunged over parking space and hit wall.

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2607	AVALON	2008	11/9/2009	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on an unknown date he was driving on the freeway at about 75 MPH and applied the brakes but the cruise control would not disengage. Customer further claims that on an unknown date he was trying to pass a truck on the interstate and the vehicle kept speeding up until it reached 90 MPH, and slowed down after pressing on the brakes for 2-3 miles. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2608	VENZA	2009	11/9/2009	Customer called regarding 2009 Venza. Specifically, customer claims that she has had two experiences in which her vehicle has taken off on its own. Customer further claims that in one instance, this happened when she was hitting the brakes, and in a second instance it happened while she was on the expressway traveling at 55 to 60 miles per hour and had to stop short, at which point the vehicle lunged forward. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2609	TACOMA	2010	11/9/2009	Customer called regarding 2010 Toyota Tacoma Prerunner 4X2. Specifically, customer claims that she was driving the vehicle in a parking lot and took her foot off the accelerator, but the vehicle kept accelerating. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2610	CAMRY	2005	11/9/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date in 2005, her vehicle accelerated by itself, causing her to almost hit a pole.
2611	PRIUS	2008	11/9/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2612	AVALON	2007	11/9/2009	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward without him pressing on the gas pedal on two separate occasions.
2613	CAMRY	2009	11/9/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on November 6, 2009, while his wife was driving the vehicle, it took off and the RPMs raised up to 5000. Customer claims that that while driving down a hill, at a stop sign, the vehicle's brakes and steering would not work. Customer claims that this occurred two other times.
2614	COROLLA	2010	11/9/2009	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated by itself.
2615	PRIUS	2010	11/9/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle unintentionally accelerates but failed to provide a specific date. FTS did not inspect the vehicle. The customer further claims the vehicle revs and accelerates while already in motion.
2616	CAMRY	2002	11/9/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on November 2, 2009 she placed vehicle in reverse and it accelerated without responding to braking, striking a pole. Customer further claims she put the vehicle in drive, causing it to jerk forward, jump a median, and strike a shopping cart.
2617	CAMRY	2005	11/9/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, the pedal goes too fast when she accelerates. On another occasion, the vehicle stopped on her in the middle of the road.
2618	RAV 4	2008	11/9/2009	Customer called regarding her 2008 Toyota Rav4. Specifically, customer claims that she was traveling down a driveway at 10 to 15 miles per hour and that when she approached the road she let up on the gas pedal and pressed on the brake. Customer further claims that the vehicle suddenly accelerated, but that she was able to stop the vehicle by pressing the brake, putting the vehicle into park, and turning the motor off. Customer states that this is the second time this has happened. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
2619	CAMRY	2008	11/9/2009	Customer emailed regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date her gas pedal became stuck while driving on the expressway.
2620	CAMRY	2007	11/9/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was involved in an accident on November 2, 2009. Customer claims that she was driving and attempted to slow down by braking, but that the vehicle accelerated instead. Customer states that she hit the back of another vehicle. Customer claims that her vehicle sustained front-end damage and that she was injured in the accident.
2621	CAMRY	2008	11/9/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 11/4/2009 he could not stop his vehicle and it accelerated through an intersection. Customer further claims that his mother was in a previous accident in the same vehicle, which she believes to be caused by the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2622	SC 430	2006	11/9/2009	Customer called regarding his 2006 Lexus SC 430. Specifically, customer claims that on an unknown date his vehicle accelerated from the driveway and was stopped by a tree.
2623	AVALON	2008	11/9/2009	Customer emailed Toyota claiming that he was concerned with the acceleration in his 2008 Toyota Avalon Limited. The acceleration occurred on an unknown date.
2624	4RUNNER	2005	11/9/2009	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on November 3, 2009, he was stopped at a intersection when his vehicle suddenly accelerated and he had to slam the brake to stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2625	CAMRY	2003	11/9/2009	Customer called regarding her 2003 Toyota Camry LE. Customer claims that on an unknown day in August 2009, she was pulling into a parking spot when the vehicle revved up and sped to 20-30 miles per hour despite attempts to brake.
2626	CAMRY	2005	11/9/2009	Customer called regarding her 2005 Toyota Camry LE (V6). Specifically, customer claims that in May of 2005, her foot slipped of the brake pedal and the vehicle accelerated and hit another vehicle.
2627	ES350	2008	11/10/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration when his wife was driving.
2628	LX 570	2008	11/10/2009	Customer called regarding her 2008 Lexus LX 570. Specifically, customer claims that on an unknown date she experienced unintended acceleration.
2629	CAMRY	2002	11/10/2009	Customer called regarding his 2002 Toyota CAMRY XLE. Specifically, customer claims that on unknown dates his vehicle has accelerated after being stopped. An FTS inspected the vehicle.
2630	PRIUS	2009	11/10/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on October 7, 2009, she was backing up in her garage, when the vehicle suddenly accelerated backwards and ran into her garage cabinets, damaging the car at the rear. Customer further claims that when she put the car in drive to move away from the cabinets, the vehicle surged forward, hitting her friend's 6 year old Mercedes, damaging the front of her vehicle. Customer further claims she tried to hit the brakes, but there was not enough response time. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2631	CAMRY	2002	11/10/2009	Customer called regarding his 2002 Toyota CAMRY XLE. Specifically, customer claims that on an unknown date his wife placed the vehicle in park when it suddenly accelerated and struck another vehicle.
2632	PRIUS	2007	11/10/2009	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that after her car was repaired by the dealer after an accident on 07/03/09 (not related to any problems with the car), the car hesitated while accelerating, and then surged, sometimes from 30 to 60 mph. FTS inspected vehicle twice. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2633	PRIUS	2009	11/10/2009	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while at a full stop, the vehicle would not accelerate, and then took off. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2634	CAMRY	2010	11/10/2009	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date, while the vehicle was traveling 15 mph, the vehicle would not stop causing him to have an accident. Customer claims that he is concerned that this was due to unintended acceleration.
2635	LS 460	2007	11/10/2009	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on an unknown date he was about to put the vehicle in park when the vehicle started going forward. Customer further claims that he went through a store, and stopped the car by pressing the start button. Customer claims that the sudden acceleration occurred while the car was at a full stop.
2636	VENZA	2009	11/10/2009	Customer called regarding 2009 Venza. Specifically, customer claims that on November 9, 2009, she was driving in her vehicle and was approaching a building when the vehicle lunged forward and went through the side of a building. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2637	CAMRY	2009	11/10/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that the vehicle hesitated. Customer further claims that the vehicle hesitates for one to two seconds upon acceleration. Customer states that he wants his vehicle replaced.
2638	GS 300	2006	11/10/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on unknown dates the acceleration increased when going down a hill and sometimes even on a flat road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2639	CAMRY	2007	11/10/2009	Customer called regarding 2007 Toyota Camry. Customer claims that vehicle moved slowly while she had her foot on the brake pedal.
2640	CAMRY	2005	11/10/2009	Customer emailed regarding his 2005 Toyota Camry LE. Specifically, customer claims that on the Saturday prior to the email (September 10, 2009), while backing out of his driveway, he stopped the car, and an incident occurred.
2641	CAMRY	2009	11/10/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that she is a senior citizen and is scared of her vehicle because of the media release.
2642	CAMRY	2007	11/10/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date in August 2009 he was backing into his garage when the engine revved up and the vehicle surged backwards and hit some boxes in the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2643	CAMRY	2009	11/10/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that her gas pedal has been getting stuck and that she escaped two rear end collisions. Customer further claims that on November 5, 2009, she took her foot off the accelerator pedal but the vehicle continued to accelerate. Customer states that during this incident, she was able to stop the vehicle by "mashing" on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2644	CAMRY	2008	11/10/2009	Customer called regarding his 2008 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle surged forward while in cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2645	CAMRY	2004	11/10/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on November 28, 2008, he was involved in an accident which he attributes to unintended acceleration.
2646	IS 300	2004	11/10/2009	Customer called regarding his 2004 Lexus IS 300. Specifically, customer claims that on an unknown date he has been concerned with a sticking gas pedal.
2647	ES350	2010	11/10/2009	Customer called regarding his 2010 Lexus ES 350. Specifically, customer claims that on an unknown date, he was almost involved in a collision due to unintended acceleration. The vehicle was inspected and it was determined that the vehicle was operating as designed.
2648	CAMRY	2006	11/10/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on three to four occasions, she has had a problem with her accelerator. Customer claims that when she steps on the accelerator, to move the vehicle out of the park position it just lurches forward. Customer claims that the sudden acceleration occurred while the vehicle is already stopped.
2649	CAMRY SOLARA	2006	11/10/2009	Customer called regarding his 2006 Toyota Camry Solara SE. Specifically, customer claims that on an unknown date, she had a concern with brake interference. Customer claims that this caused an accident.
2650	Corolla	2006	11/10/2009	Customer called and emailed regarding his daughter's 2006 Toyota Corolla. Specifically, customer claims that his wife was driving his daughter's vehicle when the cruise control locked up, causing her to be in an accident. Customer further claims that at the time of the accident, his wife's foot was on the brake pedal. Customer claims that the cruise control lock-up occurred while the vehicle was already in motion.
2651	PRIUS	2007	11/10/2009	Customer emailed regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but around 3-5 times a month since December 2006, the vehicle accelerated on its own while in motion. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2652	RAV 4	2004	11/10/2009	Customer emailed regarding her 2004 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle had acceleration issues when in cruise control going up hills.
2653	CAMRY	2006	11/11/2009	Customer called regarding his 2006 Toyota Camry LE (V6). Specifically, customer claims that on unknown dates, on three different occasions, she experienced unintended acceleration. On one occasion, she claims she ran into a wall at a shopping mall. On another occasion, she claims she ran into the dryer in her garage. On the third occasion, she claims she ran over a curb in a parking lot. Customer claims that the sudden accelerations occurred while the vehicle was already in motion.
2654	CAMRY	2003	11/11/2009	Customer called regarding his mother's 2003 Toyota Camry XLE. Specifically, customer claims that his mother has had two accidents related to surging. Customer further claims that on December 6, 2006, while his mother was driving the vehicle accelerated on its own and crashed into a building. Customer further claims that in October, 2009, his mother was involved in another accident in which the vehicle accelerated on its own and hit another vehicle.

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2655	Sequoia	2006	11/11/2009	Customer called regarding his 2006 Toyota Sequoia. Specifically, customer claims that on unknown dates, his vehicle randomly accelerated. Customer further claims that on one occasion, his vehicle accelerated by 10 mph and his brakes did not respond for 5 seconds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2656	CAMRY	2002	11/11/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date his wife was backing out of the garage with little pressure on gas and went to maximum throttle. Customer further claims that wife put foot on brake and nothing happened.
2657	RX 350	2009	11/11/2009	Customer's partner called regarding customer's 2009 Lexus RX 350. Specifically, customer claims that on an unknown date vehicle jumped forward while shifting from reverse into drive.
2658	PRIUS	2007	11/11/2009	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but 4 or 5 times when driving on the freeway, the car's engine seemed to speed up a little. Customer further claims that when putting vehicle in park and releasing the brake, the vehicle sometimes moved forward a few inches. Customer claims that the sudden acceleration occurred while the vehicle was both already in motion and at a full stop.
2659	CAMRY	2003	11/11/2009	Customer called regarding 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date the accelerator pedal has stuck in the past.
2660	PRIUS	2005	11/11/2009	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates there was a jerking feeling when he took his foot off the accelerator and started braking. Customer further claims that he felt a surge but not a constant acceleration. Customer claim that the sudden acceleration occurred while the vehicle was already in motion.
2661	AVALON	2005	11/11/2009	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that when he steps on the brakes, the vehicle accelerates. Customer further claims that the gas pedal sticks even though the floor mats have been removed. Customer claims that unintended acceleration has occurred four (4) times since owning the vehicle.
2662	CAMRY	2009	11/11/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that his wife was involved in an accident on November 10, 2009. Customer further claims that when his wife was trying to park the vehicle, it accelerated on its own, causing the vehicle to slam into a light post. Customer claims that while trying to control the vehicle, his wife placed the vehicle in reverse, after which the vehicle again accelerated on its own and crashed into 3 other vehicles. Customer claims that the brakes did not work.
2663	ES 300	2002	11/11/2009	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that on an unknown date
2664	SC 400	1998	11/11/2009	Customer called regarding her 1998 Lexus SC 400. Specifically, customer claims that on unknown dates vehicle exhibited problems with its floor mats.
2665	PRIUS	2002	11/11/2009	Customer called regarding her 2002 Toyota PRIUS 4-DOOR. Specifically, customer claims that on an unknown date his wife was at a stop in vehicle when it surged forward.
2666	RX 400h	2006	11/11/2009	Customer called regarding his 2006 Lexus RX 400h. Specifically, customer claims that on an unknown date he was at a stop and while he was slowing down the vehicle accelerated. Customer further claims that as he was stepping on the brakes the car surged forward. Customer claims that the sudden acceleration occurred while the car was already in motion.
2667	CAMRY	2004	11/12/2009	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on unknown dates, she has had accelerator issues.
2668	ES350	2007	11/12/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, while pulling into a parking spot, before putting the vehicle in gear, the vehicle accelerated, causing him to hit a building. A Field Technical Specialist came out and inspected the vehicle and determined that there was no defect. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2669	TACOMA	2009	11/12/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on November 11, 2009 the vehicle surged forward into another vehicle when his foot was on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2670	HIGHLANDER	2006	11/12/2009	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that in September 2009 the vehicle experienced sudden acceleration from 40 to 65 mph. Customer further claims that he was able to stop the vehicle by putting it into neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2671	CAMRY	2003	11/12/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle took off on her twice.
2672	AVALON	2008	11/12/2009	Customer called regarding her 2008 Toyota Avalon Touring. Specifically, customer claims that on an unknown date, while driving at approximately 15 miles per hour into her garage, with her foot on the brake, her vehicle suddenly accelerated, causing her to crash into her garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2673	CAMRY	2003	11/12/2009	Customer called regarding her 2003 Toyota CAMRY XLE. Specifically, customer claims that on three unknown dates her vehicle experienced sudden acceleration which she prevented by braking. Customer further states that on July 19, 2009 the vehicle again accelerated and struck a garage.
2674	RAV 4	2008	11/12/2009	Customer wrote regarding her 2008 Toyota Rav4. Specifically, customer claims that in or around March 2009, she was involved in an accident caused by sudden acceleration. Customer further claims that her vehicle did not stop until it collided with another vehicle. Customer claims that she has had multiple experiences with sudden acceleration, where the vehicle accelerates more quickly than expected despite the fact that she barely touches the accelerator. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
2675	TACOMA	2008	11/12/2009	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle accelerated by itself when customer was backing the vehicle into the driveway, causing it to collide with another vehicle. Customer further claims that she had both feet on the brakes but the vehicle did not stop. Customer claims that the engine was revving. Customer states that she was able to stop the vehicle by putting it in neutral and shutting the engine off. Customer claims that sudden acceleration occurred while the vehicle was in motion.
2676	SCION TC	2005	11/12/2009	Customer called regarding her 2005 Toyota Scion TC. Specifically, customer claims that on November 10, 2009, she was in an accident when her vehicle suddenly accelerated and the brakes did not work. Customer claims that the sudden acceleration occurred while the car was already in motion.
2677	CAMRY	2005	11/12/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on September 24, 2007, his vehicle accelerated on its own backwards. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2678	TACOMA	2009	11/12/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle accelerated up to 2000 rpm and made noise when shifting between 1st and 2nd gear. Customer further claims that when he is carrying any load the problem is worse. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2679	AVALON	2006	11/12/2009	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while using cruise control, the vehicle increased speed to 90 mph when they were cruising at 65 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2680	AVALON	2009	11/12/2009	Customer called regarding his 2009 Toyota Avalon. Specifically, customer claims that unknown dates when slowing down the vehicle surged forward and customer had to apply the brakes with more than normal foot pressure. Customer further claims that he is still having the issue after the dealer updated the software and customer took out the floor mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2681	PRIUS	2005	11/12/2009	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2682	CAMRY	2005	11/12/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 11, 2009, she experienced an accelerator incident. Customer claims that while driving her vehicle in town, she came around a corner, and was about to park, and the car was in an accident. Customer further claims that her vehicle was accelerating out of control. A Field Technical Specialist inspected the vehicle.
2683	ES350	2009	11/12/2009	Customer called regarding 2009 Lexus ES 350. Specifically, customer claims that on unknown dates, he believes that he was having accelerating issues.
2684	PRIUS	2005	11/13/2009	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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2685	CAMRY	2010	11/13/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged when pulling out of a complete stop. Customer further claims that the vehicle's accelerator got stuck and then the vehicle jumped or lunged forward. Customer further claims the vehicle lunged forward when she pulled into her garage. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2686	PRIUS	2010	11/13/2009	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but 6 times since the purchase of the vehicle, while braking, there has been sudden acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2687	4RUNNER	2008	11/13/2009	Customer's wife called regarding customer's 2008 Toyota 4Runner. Specifically, customer claims that on unknown dates the RPM revved and the vehicle went above 80 mph, and that he put the vehicle in neutral to slow it down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2688	HIGHLANDER	2004	11/13/2009	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle surged forward into the garage wall when she was pulling into the driveway. Customer further claims that on an unknown date the vehicle accelerated unintentionally into a traffic sign on private property. Customer further claims that on November 12, 2009 the vehicle surged but there was no accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2689	CAMRY	2005	11/13/2009	Customer called regarding her 2005 Toyota Camry XLE (V6). Customer claims that on unknown dates, she was unable to get the vehicle started.
2690	COROLLA	2008	11/13/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on November 13, 2009 the vehicle began to accelerate on its own while she was driving in a parking lot. Customer further claims that she was able to shift the vehicle into neutral and stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2691	CAMRY	2003	11/13/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her vehicle lurched and then about a year later did the same thing. Customer further claims that her foot was on the accelerator at the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2692	ES350	2007	11/13/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on October 29, 2009 the vehicle surged forward and hit the vehicle in front of her. Customer further claims that she had to put the vehicle in park in order to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2693	CAMRY	2009	11/13/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on two dates in September and October 2009 the vehicle would quickly surge ahead when pressing on the accelerator. She was able to gain control by letting up off the pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2694	AVALON	2005	11/13/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on July 12, 2009, while her grandson was driving the vehicle, he pressed on brake as he approached intersection and vehicle started to accelerate. Customer claims that that he ran over the curb and into a stop sign, he pressed the start button and the vehicle turned off. Customer further claims that in February of 2009, while approaching a stop sign, with the brakes depressed, the vehicle suddenly accelerated. Customer claims that she put the vehicle into reverse and the vehicle shot backwards.
2695	PRIUS	2008	11/13/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on 11/10/09, the vehicle unintentionally accelerated into a trailer home. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2696	PRIUS	2010	11/13/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle unintentionally accelerated on 11/11/2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2697	HIGHLANDER	2006	11/13/2009	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle's accelerator stuck 2 to 3 times while his wife was driving on a freeway. Customer further claims that his wife stepped on the brakes and the vehicle still sped up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2698	CAMRY	2005	11/13/2009	Customer called regarding her 2005 Toyota Camry XLE. Specifically, customer claims that on November 7, 2009, while backing out of her driveway, the vehicle accelerated on its own. Customer claims that she ran into her neighbor's car. Customer further claims that her foot was slightly on the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2699	AVALON	2005	11/13/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lunged forward when coming to a stop.
2700	LS 400	2000	11/13/2009	Customer called regarding his 2000 Lexus LS 400. Specifically, customer claims that on an unknown date his vehicle had unintended acceleration.
2701	ES350	2007	11/13/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle experienced sudden acceleration.
2702	PRIUS	2005	11/14/2009	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates he has experienced an acceleration concern. Customer further claims that he could not get the vehicle to start and on the warning light came on. Customer further claims that when he made a turn, the acceleration concern got worse. A Field Technical Specialist inspected the vehicle.
2703	COROLLA	2005	11/14/2009	Customer emailed regarding her 2005 Toyota Corolla. Specifically, customer claims that in June 2009 she had an accident when her vehicle suddenly accelerated and would not stop, even when she had her foot on the brake.
2704	Prius	2010	11/16/2009	Customer claims that when driving 15-25 mph, the vehicle accelerates when it hits a bump and driver brakes. Vehicle inspected and condition duplicated. No repairs made, customer advised that vehicle is operating as designed.
2705	CAMRY	2007	11/16/2009	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically, customer claims that on November 9, 2009, customer's wife was stopped at a stop light when the vehicle accelerated on its own and hit the vehicle in front of her. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2706	CAMRY	2007	11/16/2009	Customer called regarding his 2007 Toyota Camry. Customer claims that on an unknown date his vehicle had an unspecified acceleration problem and he wants an explanation of the floor mat safety letter.
2707	CAMRY	2002	11/16/2009	Customer called regarding 2002 Toyota SE (V6). Specifically, customer claims that on October 6, 2005 the vehicle's throttle became stuck open and after customer brought vehicle to a stop the engine revved to over 6,000 rpm. Customer further claims the vehicle's gas pedal has become stuck in past.
2708	PRIUS	2006	11/16/2009	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2709	AVALON	2007	11/16/2009	Customer called regarding 2007 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, the vehicle experienced sudden unintended acceleration in a parking garage. A Field Technical Specialist scheduled an inspection.
2710	CAMRY	2008	11/16/2009	Customer called regarding his 2008 Toyota Camry. Without providing specifics, customer claims that vehicle accelerates by itself while driving.
2711	CAMRY	2010	11/16/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that her gas pedal became stuck when she was in reverse, causing her to strike the vehicle behind her. Customer states that the vehicle surged when it was in reverse. Customer further claims that her rear bumper is dented as a result of the incident. Customer states that her floor mats were on their hooks during this incident. Customer states that she did not attempt to brake until she had hit the other vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2712	TACOMA	2005	11/16/2009	Customer called regarding his 2005 Toyota Tacoma PreRunner. Specifically, customer claims that in April 2007 the vehicle accelerated when he put it in reverse. Customer further claims that he stepped on the brakes and the vehicle did not stop, causing him to rear-end an ambulance. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2713	YARIS	2009	11/16/2009	Customer called regarding her 2009 Toyota Yaris. Specifically, customer claims that she is having acceleration issues with the vehicle. Specifics are unclear.
2714	COROLLA	2008	11/16/2009	Customer called regarding his 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle unintentionally accelerated on its own three times.
2715	CAMRY	2006	11/16/2009	Customer called regarding her 2006 Toyota Camry LE (V6). Specifically, customer claims that in October of 2009, her vehicle experienced unintended acceleration. Customer claims that she hit a parked vehicle and swung onto a tree.

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2716	CAMRY	2010	11/16/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that the accelerator stuck, causing an accident. Customer further claims that she was parked and ran into a store when she was in the vehicle. Customer believes that floor mats were not the cause of the incident. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2717	CAMRY	2007	11/16/2009	Customer called regarding his 2007 Toyota Camry. Customer claims that on an unknown date his vehicle had an unspecified acceleration problem.
2718	TACOMA	2010	11/16/2009	Customer emailed regarding his 2010 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle had problems accelerating out of corners. Customer further claims that the vehicle's engine revved and the rpms went up, but the vehicle did not accelerate until it kicked into gear. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2719	TACOMA	2009	11/16/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle had accelerator issues.
2720	CAMRY	2007	11/16/2009	Customer called regarding her 2007 Toyota Camry. Customer claims that her vehicle has accelerated on its own on multiple occasions. Customer claims that the sudden accelerations occur while the vehicle is already in motion.
2721	CAMRY	2005	11/16/2009	Customer called regarding his 2005 Toyota Camry LE. Customer claims that on November 15, 2009, he was reversing out of a parking space when the vehicle suddenly shot backward and hit a child, then ran into a huge flower pot and a store window. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2722	TACOMA	2005	11/16/2009	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but a specific date is not given. It is unknown if FTS inspected the vehicle. The customer further failed to note if the sudden acceleration occurred while the vehicle was in motion.
2723	ES350	2008	11/16/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, he was involved in an accident that he believes had something to do with the notice he received of the safety advisory.
2724	TACOMA	2008	11/16/2009	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle accelerated by itself while she was pulling into a parking spot. Customer further claims that she pressed the brakes but they did not function. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2725	CAMRY	2004	11/16/2009	Customer called regarding his 2004 Toyota Camry LE. Specifically, customer claims that on an unknown date, while driving his vehicle, while putting his foot on the accelerator, it lurched forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2726	CAMRY	2005	11/16/2009	Customer called regarding his 2005 Toyota Camry LE. Specifically, customer claims that on an unknown date, while pulling into a parking space, the vehicle accelerated on its own. Customer claims that the acceleration caused her to hit a pedestrian and another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2727	CAMRY	2007	11/16/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on November 13, 2009, she was stopped at an intersection when the vehicle was rear ended by another vehicle, then took off by itself. Customer further claims that she pressed the brakes, but the vehicle continued to surge. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2728	CAMRY	2009	11/16/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that the vehicle accelerates by itself "whenever it pleases." Customer further claims that he does not feel safe in the vehicle. Customer claims that although he has removed the floor mats, the problem still occurs.
2729	CAMRY SOLARA	2006	11/16/2009	Customer called regarding her 2006 Toyota Camry Solara SE (V6). Specifically, customer claims that on June 18, 2008, while driving about 25 mph, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2730	TACOMA	2005	11/16/2009	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle accelerated and jumped out when he touched the brakes while in first gear. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2731	CAMRY LE	2008	11/16/2009	Customer emailed regarding his 2008 Toyota Camry LE. Specifically, customer claims that on unknown dates, when he removed his foot from the gas pedal and pressed the brake, the car did not slow down and may have sped up for approximately 2 seconds. Customer claims that the issue occurred while the car was already in motion.
2732	CAMRY	2009	11/16/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date, his vehicle accelerated unintentionally from 60 mph to 100 mph. Customer further claims that the brakes only partially slowed the vehicle but that the vehicle eventually slowed itself. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2733	TACOMA	2005	11/16/2009	Customer called regarding her 2005 Toyota Tacoma. Specifically, customer claims that on an unknown date, her gas pedal got stuck, causing her vehicle to accelerate and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2734	TACOMA	2008	11/16/2009	Customer called regarding his 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle accelerated by itself while he was pulling into a parking spot and ran into a building. Customer further claims that he pressed the brakes but they did not function. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2735	CAMRY	2007	11/17/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date his wife ran into a wall while parking at the doctor's office.
2736	CAMRY	2007	11/17/2009	Customer called regarding her 2007 Toyota Camry. Customer claims that on an unknown date her vehicle accelerated into a wall while parking, but she does not recall how accident happened.
2737	CAMRY	2010	11/17/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims when he drives the vehicle at 60 miles per hour, the vehicle hesitates for a "split second" and then speeds up. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
2738	CAMRY	2009	11/17/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that he was backing his vehicle out of the driveway when the vehicle started to accelerate on its own. Customer further claims that he put the vehicle in neutral and turned it off, but that when he turned the vehicle back on, the vehicle began accelerating again. Customer claims that sudden acceleration occurred while vehicle was already in motion.
2739	ES 330	2004	11/17/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date in 2006 the vehicle's gas pedal became stuck while rounding a curve, causing the vehicle to strike the median. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2740	AVALON	2006	11/17/2009	Customer called regarding his 2006 TOYOTA Avalon XLS. Specifically, customer claims that on unknown dates, his vehicle experienced sudden unintended acceleration four different times. Customer further claims that this has happened twice at high speeds and twice at lower speeds.
2741	COROLLA	2010	11/17/2009	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated abruptly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2742	CAMRY	2002	11/17/2009	Customer called regarding her 2002 Toyota CAMRY LE. Specifically, customer claims that on November 16, 2009 vehicle came to full stop with her foot on brake when vehicle surged and lurched forward striking another vehicle.
2743	CAMRY	2008	11/17/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that sometime in April or May 2009 his vehicle jumped forward while parking, went over a side wall, and hit a pole. Customer's niece further claims that vehicle accelerates when coming to a stop no matter what speed vehicle is going.
2744	CAMRY	2007	11/17/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle was in an accident due to the vehicle surging forward on its own.
2745	AVALON	2006	11/17/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that he is concerned about the floor mats, he took the vehicle to the dealer, and the dealer adjusted the floor mats. Customer further claims that when the vehicle was only 6 months old, he stepped on the brake and the vehicle accelerated and hit another vehicle. Customer also claims that while his was driving into a parking lot, the vehicle took off. The dates of the events are unknown.
2746	TUNDRA	2007	11/17/2009	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that he has had approximately three or four incidents in which he was going down a hill and the vehicle lurched forward. Customer claims that sudden acceleration occurred while vehicle was already in motion.

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2747	PRIUS	2007	11/17/2009	Customer called regarding his 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2748	VENZA	2009	11/17/2009	Customer called regarding 2009 Venza. Specifically, customer claims that on November 17, 2009 his wife was about to put the vehicle in park when the vehicle suddenly began lurching forward and started revving. Customer further claims that his wife tried to stop the vehicle by pressing the brake but was unable to stop the car even after the vehicle hit another car and kept revving. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred when the vehicle was at a full stop.
2749	CAMRY	2004	11/17/2009	Customer called regarding her 2004 Toyota Camry STD. Specifically, customer claims that on an unknown date, while driving 25 mph, she took her foot of the accelerator and the vehicle was still accelerating.
2750	TACOMA	2006	11/17/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 11/17/2009. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2751	SEQUOIA	2006	11/17/2009	Customer wrote regarding her 2006 Toyota Sequoia. Specifically, customer claims that the vehicle unexpectedly lurches forward when the gas pedal is not depressed. Customer further claims that when the vehicle has come to a stop, it will lunge forward even though the brake pedal is fully depressed.
2752	IS 300	2001	11/17/2009	Customer called regarding her 2001 Lexus IS 300. Specifically, customer claims that on November 13, 2009 his wife was driving when the vehicle accelerated out of control, despite his wife's effort to place the vehicle in neutral. Customer further claims that the vehicle stopped when it struck a telephone pole. An FTS inspected the vehicle.
2753	CAMRY	2009	11/17/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date, she was turning around in a parking lot when the vehicle surged and accelerated on its own. The vehicle stopped when she pressed the brake. Customer further claims she has all weather floor mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2754	CAMRY	2007	11/17/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on July 11, 2008, she was driving into a parking lot when the vehicle jumped forward, went through a fence then went airborne over a 6 foot wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2755	CAMRY	2009	11/17/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that she was traveling at approximately 35 miles per hour, and that she was not able to stop the vehicle completely when applying the brakes. Customer further claims that this caused her to drive through a red light. Customer claims that she was able to stop the vehicle by using the emergency brake.
2756	CAMRY	2004	11/17/2009	Customer called regarding her 2004 Toyota Camry LE. Specifically, customer claims that on October 31, 2009, while pulling into a parking space, the vehicle hit 2 signs and a curb. Customer claims that while driving about 25 mph, the vehicle would not stop when she pressed the brake.
2757	AVALON	2006	11/17/2009	Customer emailed regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle sped up for a few seconds and then returned to normal speed while she was driving at 30 to 45 mph. Customer further claims that the speedometer did not reflect this burst of speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2758	PRIUS	2007	11/17/2009	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the car accelerated by itself on right hand turns. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2759	CAMRY	2007	11/17/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date he was slowing down from 50 mph in traffic and the vehicle sped up to 60-65 mph. He pulled over to the side of the road and turned off the engine. Customer further claims that on another unknown date his wife was driving about 35 mph and the vehicle accelerated to 45 mph, so she pulled over. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2760	TACOMA	2009	11/17/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration and that the vehicle seemed to surge and go faster when he drove about 35 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2761	AVALON	2006	11/17/2009	Customer emailed regarding his 2006 Toyota Avalon. Specifically, customer claims that on two unknown dates the vehicle experienced unintended acceleration.

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2762	TACOMA	2005	11/17/2009	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle surged forward and went out of control a few different times when he went to hit the brake while approaching an intersection. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2763	CAMRY	2007	11/17/2009	Customer emailed regarding his 2007 Toyota Camry. Specifically, on an unknown date in December 2007 the engine was racing and the RPMs were up and he could not slow the vehicle down until he coasted with his foot off the gas for about 1/2 mile. Customer claims that the unintended acceleration occurred while the vehicle was already in motion.
2764	CAMRY	2009	11/18/2009	Customer called regarding her 2009 Toyota Camry XLE. Specifically, customer claims that in August 2009 she was backing into her garage when the vehicle accelerated on its own, running into objects in the garage. She pressed the brakes but they did not respond until after about 30 feet. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2765	CAMRY	2005	11/18/2009	Customer called regarding her 2005 Toyota Camry XLE. Specifically, customer claims that on unknown dates, on a few occasions, the vehicle revved up and accelerated. Customer claims that on one occasion, she ran into the back of another motorist.
2766	HIGHLANDER	2005	11/18/2009	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle accelerated on its own into the vehicle in front of her when she took her foot off of the brake while in traffic. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2767	TACOMA	2005	11/18/2009	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated in 11/2007 which caused an accident. FTS did inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2768	CAMRY	2007	11/18/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged going from gear to gear when he accelerated or decelerated.
2769	CAMRY	2008	11/18/2009	Customer called regarding her 2008 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
2770	COROLLA	2007	11/18/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates she was stopped at a red light with her foot on the brake when the engine raced and pulled ahead. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2771	CAMRY	2008	11/18/2009	Customer called regarding 2008 Toyota Camry. Customer claims that she had an accident in April 2009, but she is unsure what caused the accident.
2772	CAMRY	2009	11/18/2009	Customer called regarding her 2009 Toyota Camry 2009. Specifically, customer claims that on 10/14/09 she was pulling into a parking space when the vehicle lunged forward, hitting a cement lamp post and curb divider. Customer further claimed the floor mats were clipped into place. A Field Technical Specialist (FTS) inspected the floor mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2773	IS250	2009	11/18/2009	Customer called regarding her 2009 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle jumped over the curb. An FTS inspected the vehicle.
2774	CAMRY	2005	11/18/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 16, 2009, her vehicle accelerated on its own. Customer further claims that her vehicle was in park when it shot out of the garage and across the street, traveling 30-40 feet before it crashed into a transformer box. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2775	YARIS	2009	11/18/2009	Customer called regarding her 2009 Toyota Yaris. Specifically, customer claims that on November 12, 2009, she was parking her car when her vehicle suddenly accelerated, causing her to hit a pole in the parking lot. A Field Technical Specialist (FTS) inspected the vehicle.
2776	PRIUS	2007	11/19/2009	Customer called about her 2007 Toyota Prius Touring Edition Hybrid. Specifically, customer claims that on an unknown date, the car suddenly accelerated causing her to jump a curb and hit a lamp post. Customer further claims that at the time of the accident she had her foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.

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2777	CAMRY	2004	11/19/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that in August 2009, she was turning right into a parking space at a speed less than 5mph when the vehicle accelerated even though she had applied the brake. Customer further claims that as a result of the acceleration, she drove over a cement block.
2778	TACOMA	2007	11/19/2009	Customer called regarding his 2007 Toyota Tacoma Prerunner. Specifically, customer claims that although he has removed the floor mats, he continues to experience unintended acceleration. The details of the underlying incidents are unknown.
2779	ES350	2008	11/19/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that in July of 2009, while parking, she went over a curb. Customer claims that the police officer advised she might have hit the gas instead of the brakes but customer believes the accident might have been due to the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2780	CAMRY	2006	11/19/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on September 20, 2009, his vehicle veered to the left and abruptly accelerated, causing the vehicle to run into a fire house. Customer further claims his floor mats were not secure at the time and were the cause of the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2781	TACOMA	2007	11/19/2009	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on two separate occasions which caused accidents. Specific dates were not mention and it is unknown if FTS inspected the vehicle. The customer further claims the vehicle revved up and suddenly accelerated while already in motion.
2782	ES350	2007	11/19/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, he experienced acceleration. Customer claims that while passing another vehicle, his vehicle accelerated and would not stop.
2783	ES350	2008	11/19/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, her daughter was involved in an accident. Customer claims that that she could not slow the vehicle, and she was issued a traffic citation.
2784	CAMRY	2004	11/19/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that in either late August 2009 or early September 2009, she was pulling over into the left lane and braking when she felt the vehicle surge tremendously.
2785	CAMRY	2007	11/19/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claimed that on an unknown date the vehicle surged to 120 mph. Customer further claimed that she was concerned with the floor mat issue and did not trust the vehicle.
2786	CAMRY	2008	11/19/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on three occasions, dates unknown, his vehicle redlined on the RPM gauge and accelerated while driving up an incline with the cruise control on. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2787	CAMRY	2008	11/19/2009	Customer called regarding his 2008 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2788	TACOMA	2006	11/19/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated in 5/2009. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle suddenly accelerated while already in motion.
2789	CAMRY	2002	11/19/2009	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on October 9, 2009, he was driving in slow traffic on an interstate when the car suddenly accelerated and hit another vehicle. Customer further claims that the brakes would not stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2790	ES350	2007	11/19/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle lurched forward when she drove it at 38 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2791	AVALON	2005	11/19/2009	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on November 19, 2009 the vehicle surged and jumped the curb, almost running into trees on his lawn. Customer further claims that on unknown prior dates the vehicle has surged multiple times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2792	CAMRY	2007	11/19/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that vehicle began to accelerate on its own for approximately two to three seconds in October or November 2009. Customer further claims that the vehicle would not stop despite depression of the brakes. Customer states that this has been happening ever since she purchased the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2793	HIGHLANDER	2008	11/19/2009	Customer called regarding his 2008 Toyota Highlander Sport. Specifically, customer claims that on November 19, 2009 the vehicle sped up to 100 mph while he was driving on the freeway. Customer further claims that he was able to put the vehicle in neutral and apply the emergency brake. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2794	CAMRY	2007	11/20/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle jumped out of gear and ran into a garage door when the vehicle was in park with the engine running. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2795	CAMRY	2009	11/20/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that his wife feels that their new vehicle moves fast, and that the vehicle is "in acceleration mode with little coasting ability."
2796	CAMRY	2007	11/20/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in August 2007 the vehicle lunged forward as she was pulling into her parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2797	CAMRY	2002	11/20/2009	Customer called regarding his 2002 Camry LE. Specifically, customer claims that in the summer of 2007 and the summer of 2009 his vehicle suddenly accelerated and he almost struck a pedestrian on one occasion. Customer further claims that the vehicle was going about 30-25 miles per hour. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2798	SEQUOIA	2006	11/20/2009	Customer wrote regarding her 2006 Toyota Sequoia. Specifically, customer claims that the vehicle unexpectedly lurches forward when the gas pedal is not depressed. Customer further claims that when the vehicle has come to a stop, it will lunge forward even though the brake pedal is fully depressed.
2799	CAMRY	2004	11/20/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, he was driving at approx. 30 mph and found that he was unable to stop the vehicle, even though he applied the brakes. Customer further claims that as a result, he rear-ended another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2800	PRIUS	2010	11/20/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 11/20/2009, which caused a minor accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2801	CAMRY SOLARA	2008	11/20/2009	Customer called regarding her 2008 Toyota Camry Solara. Specifically, customer claims that on November 5, 2009, the vehicle surged ahead. Customer further claims that the floor mats were not the problem.
2802	PRIUS	2006	11/20/2009	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2803	ES350	2008	11/20/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on November 15, 2009 the vehicle accelerated on its own when he was pulling into a parking spot, causing him to crash into a parked vehicle. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2804	MATRIX	2009	11/20/2009	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on October 2, 2009, she was stopped in a parking spot facing a building when the vehicle lunged into the wall of the building. Customer further claims that on November 19, 2009, the vehicle revved up and started to lunge forward while the customer's daughter had her foot on the brake, but she was able to stop the vehicle by applying the brakes very hard. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2805	4RUNNER	2008	11/20/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on an unknown date he was driving and as he tried to pass another vehicle, the engine would not slow down and the vehicle accelerated to 95 mph. Customer further claims that he shifted into neutral to slow the vehicle down, but the engine continued to rev up to red line before coming down. Customer further claims that this occurred both with and without cruise control being engaged. Customer further claims that the aftermarket floor mats were getting stuck under the pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2806	ES350	2008	11/20/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on September 9, 2009, her vehicle accelerated out of her control, she attempted to brake but the vehicle accelerated and she hit another vehicle.

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2807	AVALON	2005	11/20/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while at a stop sign or red light, she took her foot off the brakes and when she hits the brakes the vehicle accelerates on its own.
2808	CAMRY	2009	11/20/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that she is having problems with the vehicle's acceleration because sometimes her vehicle does not accelerate right away and sometimes her vehicle accelerates too fast. Customer further claims that she has already taken her floor mats out of the vehicle.
2809	ES350	2007	11/20/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, he experienced unintended acceleration on two occasions. Customer claims that the acceleration happened once while the floor mats were in and once while the floor mats were out.
2810	PRIUS	2008	11/20/2009	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, customer was driving the vehicle and it surged unexpectedly; the vehicle speeds up and then comes back down to reasonable speed after a few seconds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2811	PRIUS	2007	11/21/2009	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, the vehicle accelerated without the foot on the gas, and the brake did not stop the vehicle. Customer further claims that the floormat had been removed weeks before the incident. Customer further complained of poor rear window visibility. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2812	PRIUS	2007	11/21/2009	Customer called regarding his 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2813	HIGHLANDER	2004	11/21/2009	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle accelerated on its own when she was on the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2814	CAMRY	2009	11/21/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on 10/28/09 his wife was driving the vehicle and was trying to park; when she removed her foot from the gas pedal, the vehicle accelerated and hit the patio and fence, and even then the tires continued to spin. Information from a follow-up call states the gas pedal was stuck behind the carpet, but it is unclear if that is the customer's claim. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2815	CAMRY	2009	11/23/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 11/19/09 she was easing through traffic and had her foot on the brake pedal on and off, when the car suddenly accelerated. She hit the brakes but the engine continued revving, and struck the car in front of her. After the collision the engine continued to rev. Customer further claims that she has the original Toyota floor mats, but that these were not the problem. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2816	CAMRY	2007	11/23/2009	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that vehicle sometimes takes off even though customer has taken foot off the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2817	FJ CRUISER	2007	11/23/2009	Customer called regarding her 2007 Toyota FJ Cruiser. Specifically, customer claims that on unknown dates the vehicle's floor mat slid onto the accelerator pedal five times before she removed the floor mat.
2818	COROLLA	2010	11/23/2009	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the RPMs were high when driving, even when his foot was off the gas.
2819	RAV 4	2009	11/23/2009	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates, on three occasions, customer experienced spontaneous acceleration when foot was not on the gas pedal, and that customer was able to avoid an accident by grabbing the steering wheel and slamming on the brake. Customer claims she had previously removed the floor mat. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2820	RAV 4	2010	11/23/2009	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle began to accelerate on its own while she was at a stop light. Customer further claims that she put the vehicle in neutral and stopped the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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2821	CAMRY	2002	11/23/2009	Customer called regarding his 2002 Toyota Camry LE. Customer claims that on multiple occasions on unknown dates in 2007, his vehicle accelerated on its own when the gas pedal was released. Customer claims the sudden acceleration occurred on one occasion when the vehicle was at a full stop.
2822	TACOMA	2006	11/23/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date the vehicle lunged forward into his garage when he was in his driveway.
2823	PRIUS	2010	11/23/2009	Customer called regarding his 2010 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated.
2824	CAMRY	2003	11/23/2009	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her husband was pulling into a garage and the vehicle suddenly accelerated, hitting a wall. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2825	CAMRY	2007	11/23/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was driving her vehicle and took her foot off the accelerator when the vehicle began accelerating on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2826	PRIUS	2006	11/23/2009	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on an unknown date his wife was making a right turn at a slow speed when the engine sped up and the vehicle accelerated. Customer further claims that the vehicle jumped onto the sidewalk and his wife was able to put her foot on the brake and stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2827	TACOMA	2008	11/23/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on August 20, 2009 the vehicle began to speed up while he was driving on the highway with his foot on the gas pedal. Customer further claims that he pressed the brakes and swerved to the right, clipping the vehicle in front of him. Customer claims that he went off the road and had to dodge a pole before coming to a stop by running into a pile of dirt. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2828	PRIUS	2003	11/23/2009	Customer called regarding her 2003 Toyota Prius 4-Door. Specifically, customer claims that on numerous unknown dates her vehicle has surged on its own.
2829	CAMRY	2007	11/23/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was parallel parking on November 22, 2009 when her vehicle surged forward at a speed of 20 miles per hour despite the fact that her foot was on the brake pedal. Customer further claims that she collided with the vehicle in front of her. Customer claims that there were no floor mats in the vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2830	4RUNNER	2008	11/24/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on November 14, 2009, he was driving on the highway when the vehicle started to accelerate and vibrate, and continued to do so even after he put the vehicle in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2831	CAMRY	2007	11/24/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in 2008, she was driving into a parking space and began to apply the brakes when the vehicle suddenly sped up. Customer further claims that the vehicle went over a concrete block, hitting a line of shopping carts and a wall. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2832	AVALON	2006	11/24/2009	Customer called regarding her 2006 Toyota Avalon XL. Specifically, customer claims that on November 22, 2009, the vehicle accelerated on its own. Customer was advised to make an appointment with the dealer to have the floor mats removed.
2833	CAMRY	2005	11/24/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on two occasions, dates unknown, his vehicle engine has surged while he has attempted to slow down by stepping on the brake pedal.
2834	AVALON	2005	11/24/2009	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that in January or February of 2008, while making a left hand turn, the vehicle accelerated up to 30 mph. Customer claims that she applied the brakes but the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2835	CAMRY	2005	11/24/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on September 22, 2009, while at a red light he applied the brakes, but the vehicle launched forward, causing him to hit the vehicle in front of him. Customer further claims that the vehicle began to launch forward back in 2005.

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2836	RX 350	2008	11/24/2009	Customer called regarding her 2008 Lexus RX 350. Specifically, customer claims that her husband was driving the car on an unknown date and the car jumped from 60 mph to 70 mph. Customer further claims that on an unknown date she was parking between two cars when the vehicle flew forward, jumped the curb, and hit a building. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2837	PRIUS	2008	11/24/2009	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 11/22/09, the vehicle unintentionally accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was not in motion.
2838	CAMRY	2005	11/24/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on November 23, 2009, he was pulling into a parking spot when the vehicle surged forward and hit a wall. Customer further claims that sudden acceleration is an intermittent concern with his vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2839	RAV 4	2007	11/25/2009	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on August 7, 2007 the vehicle's accelerator got stuck and the vehicle lurched forward, causing her to run into a pole.
2840	TUNDRA	2005	11/25/2009	Customer called regarding her 2005 Toyota Tundra. Specifically, customer claims that when she pushes the brake pedal in her vehicle, it will occasionally suddenly accelerate.
2841	COROLLA	2007	11/25/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on November 24, 2009, she was pulling into a parking space with her foot on the gas pedal when the vehicle suddenly accelerated, causing her to drive over a curb and run into a wall. Customer further claims that the floor mats were stuck under the gas and brake pedals. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2842	CAMRY	2004	11/25/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on May 31, 2008, she was at a gas station with her foot on the brake when suddenly, the vehicle accelerated out of control.
2843	COROLLA	2006	11/25/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated on its own. Customer further claims that on one occasion, the vehicle was at a complete stop when it surged on its own. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2844	CAMRY	2010	11/25/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that she experienced unintended acceleration in her vehicle. The specifics of the underlying incident are unclear.
2845	Camry	2005	11/25/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, his vehicle suddenly accelerated.
2846	AVALON	2006	11/25/2009	Customer called regarding 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while on the highway, his vehicle took off, he shifted the vehicle into neutral and applied the brakes. Customer further claims that this has happened on two different occasions.
2847	CAMRY	2009	11/25/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer states that he wants to know what is being investigated about the accelerator pedal. Customer inquired about the status of the gas pedal redesign.
2848	ES 300	2002	11/25/2009	Customer called regarding her 2002 Lexus ES 300. Specifically, customer claims that two years ago, on an unknown date, her gas pedal stuck.
2849	MATRIX	2009	11/25/2009	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle's power steering went out and the odometer and tachometer went out.
2850	AVALON	2006	11/25/2009	Customer called regarding 2006 Toyota Avalon XLS. Specifically, customer claims that on November 17, 2009, while attempting to turn into her driveway, her vehicle accelerated for no reason and crashed into her porch and a round meta barrel. Customer further claims that she attempted to stop the vehicle but it would not stop. Customer had double mats stacked on top of each other, but claimed she immediately inspected the mats that they had no effect on the pedal. Case Manager left several messages for customer, and customer never called back. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2851	AVALON	2006	11/25/2009	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that he had a few concerns with his vehicle but mostly his concerns were that his vehicle's RPM's are too high.

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2852	CAMRY	2002	11/25/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that in April, 2004, he was pulling out of a parking lot when the vehicle launched forward and hit a tree. Customer further claims he is pretty sure his foot was not on the gas. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2853	4RUNNER	2008	11/25/2009	Customer emailed regarding her 2008 Toyota 4Runner. Specifically, customer claims that on November 14, 2009, she was driving on the interstate when her accelerator stuck. Customer further claims that the vehicle continued to accelerate and began to shake after she put it in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2854	TACOMA	2007	11/25/2009	Customer called about his 2007 Toyota Tacoma Prerunner. Specifically, customer claims that on May 29, 2009, the car suddenly accelerated causing him to hit another vehicle from behind. Customer further claims that at the time of the accident he had his foot on the brake pedal. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2855	COROLLA	2006	11/25/2009	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the floor mat was interfering with the accelerator.
2856	COROLLA	2009	11/25/2009	Customer called regarding 2009 Toyota Corolla. Specifically, customer claims that he has an issue with his vehicle not starting and with his vehicle accelerating quickly on its own. Customer further claims that his vehicle drifts to the right while driving.
2857	RAV 4	2007	11/25/2009	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle's gas pedal was sticking and that the engine made a whining noise.
2858	PRIUS	2006	11/25/2009	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on unknown dates when she was using the cruise control and brakes, the vehicle lunged forward. Customer further claims that the engine idled high.
2859	SCION XD	2010	11/25/2009	Customer called regarding customer's 2010 Scion XD. Specifically, customer claims that on an unknown date the gas pedal was sticking.
2860	CAMRY	2005	11/25/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that he has experienced unintended acceleration in his vehicle.
2861	4RUNNER	2007	11/25/2009	Customer emailed regarding her 2007 Toyota 4Runner. Specifically, customer claims that on an unknown date, her boyfriend was driving on the highway when the gas pedal got stuck. Customer further claims that her boyfriend kicked the gas pedal several times and it finally released. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2862	4RUNNER	2008	11/25/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on November 25, 2009, his wife was driving when the throttle became stuck and the vehicle accelerated as if it was on cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2863	CAMRY	2005	11/25/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on May 8, 2009, she was driving out of a parking lot at approx. 10mph when the vehicle accelerated, causing her to lose control of the vehicle. Customer further claims that as a result, she hit the center divider of a street. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2864	Avalon	2005	11/25/2009	Insurer emailed on behalf of customer regarding customer's 2005 Toyota Avalon. Specifically, customer claims that on February 2, 2006, her vehicle's gas pedal stuck and caused her to be in an accident.
2865	CAMRY	2007	11/25/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle intermittently accelerates on its own. Customer claims that he has removed the floor mat from the vehicle.
2866	COROLLA	2009	11/25/2009	Customer called regarding 2009 Toyota Corolla. Specifically, customer claims that on November 24, 2009, she was involved in an accident when the vehicle accelerated by itself and hit a tree while she was pulling into her driveway. Customer claims that she attempted to apply the brakes before impact, but that the brakes were inoperative. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2867	Camry	2004	11/25/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, when she was backing out of a parking space, she put her vehicle into drive and her vehicle jumped forward. Customer further claims that she stepped on the brakes and was able to stop the vehicle, preventing an accident from occurring.
2868	PRIUS	2010	11/25/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerates when she hits bumps in the road, but fails to specify a specific date of occurrence. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle suddenly accelerates while already in motion.

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2869	AVALON	2006	11/25/2009	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on that on March 3, 2009 he was involved in an accident he had originally attributed to his foot slipping off the brake. Now, after hearing the news, Customer claims that he hit the vehicle's brake, but the vehicle kept racing. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2870	CAMRY	2003	11/25/2009	Customer called regarding her 2003 Toyota Camry SE. Customer claims that on December 27, 2003, while trying to park, her vehicle accelerated and rammed another vehicle.
2871	GS 300	2006	11/25/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on unknown dates his accelerator got stuck.
2872	RX 350	2010	11/25/2009	Customer called regarding his 2010 Lexus RX 350. Specifically, customer claims that on an unknown date the floor mat interfered with the accelerator and the vehicle was going 120 mph and he had difficulty braking.
2873	Tundra	2006	11/25/2009	Customer called regarding her 2006 Toyota Tundra. Specifically, customer claims that on August 5, 2008, her vehicle accelerated on its own and caused her to crash into a tree. Customer further claims that she does not know if she applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2874	PRIUS	2008	11/25/2009	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown date, she was pulling into a parking spot and experienced unintended acceleration. Customer claims the vehicle hit a hillside and curb, resulting in damage of \$2700. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2875	TUNDRA	2003	11/25/2009	Customer called regarding her 2003 Toyota Tundra SR 5. Specifically, customer claims that on unknown dates her accelerator has been sticking over the years.
2876	CAMRY	2005	11/25/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 24, 2009, she was driving when the vehicle accelerated on its own. Customer further claims that she has experienced acceleration problems with her vehicle on three occasions. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2877	4RUNNER	2005	11/25/2009	Customer's wife called regarding customer's 2005 Toyota 4Runner. Specifically, customer claims that on an unknown date he was driving the vehicle when it just took off, but was able to stop the vehicle by putting it in neutral and applying the brakes.
2878	CAMRY	2002	11/30/2009	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on November 28, 2009, her car suddenly accelerated to 92 mph on the highway. Customer further claims that the brake pedal did not work and that she had to use the hand brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2879	CAMRY	2006	11/30/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on November 25, 2009, she was driving slowly on a slight uphill with her foot slightly on the brake, when the vehicle accelerated on its own and onto the curb. Customer further claims that she was able to stop the vehicle before it hit anything. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2880	SIENNA	2004	11/30/2009	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that she has experienced occasions on which her vehicle accelerates.
2881	CAMRY	2002	11/30/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on June 23, 2009 he had put the vehicle from neutral into reverse when the vehicle experienced unintended acceleration and it appeared the gas pedal was stuck on the floor mat. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2882	CAMRY	2004	11/30/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that approximately three years ago, she was leaving a gas station when the vehicle accelerated on its own. Customer further claims that she was able to brake the vehicle and bring it to a stop.
2883	CAMRY	2002	11/30/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that in January, 2009, her accelerator went off and she was in an accident in which she hit a cement pole and garbage can. Customer further claims that she has had two more incidents where accelerator was stuck but there was no accident. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
2884	CAMRY	2005	11/30/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 28, 2009, her mother was driving the vehicle and pulling into a driveway, and when she took her foot off of the accelerator the vehicle suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2885	FJ CRUISER	2007	11/30/2009	Customer called regarding her 2007 Toyota FJ Cruiser. Specifically, customer claims that on an unknown date the vehicle's floor mat trapped the accelerator and that she had to use the emergency brake, ruining the emergency brakes.
2886	CAMRY	2009	11/30/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that on November 23, 2009, she was driving her vehicle when it suddenly accelerated, went up a curve, ran into a building and spun around. Customer further claims that the vehicle was damaged but that no person was injured. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was still in motion.
2887	ES 330	2005	11/30/2009	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims on unknown dates that his vehicle went backwards a couple of times.
2888	CAMRY	2005	11/30/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that nine months ago, his vehicle surged on its own, and that he continues to feel that he is having an accelerator problem.
2889	IS250	2007	11/30/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on unknown dates the vehicle surged.
2890	PRIUS	2010	11/30/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but 10 times since the purchase of the vehicle, the vehicle surged after he hits a pothole, even if the brake was depressed. Customer further claims the vehicle only surged when foot was on brake pedal, not gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2891	AVALON	2006	11/30/2009	Customer called regarding her 2006 Toyota Avalon Limited. Specifically, customer claims that she has a continuing concern with the vehicle unintentionally accelerating. On dates unknown, the customer claims that while getting on to the highway, the vehicle first hesitates and then jerks forward. A Field Technical Specialist inspected the vehicle and is now operating as designed.
2892	CAMRY	2002	11/30/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle accelerated while braking. Customer futher claims that it had been happening intermittently.
2893	RAV 4	2009	11/30/2009	Customer called regarding his 2009 Rav4. Specifically, customer claims that on 11/17/09, while traveling at 20mph, customer applied the brakes and the vehicle accelerated and hit the truck in front of him. Customer claims he was not able to apply the brakes before impact, and that the airbags did not deploy. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2894	CAMRY	2010	11/30/2009	Customer called regarding his brother's 2010 Toyota Camry. Specifically, customer claims that his brother's vehicle abruptly accelerated although the floor mats were on their clips. Customer states that he himself has not experienced the issue.
2895	CAMRY	2005	11/30/2009	Customer called regarding her 2005 Toyota camry. Specifically, customer claims that on an unknown date, her vehicle accelerated on its own while she was pulling into a parking space. Customer further claims that this is the fifth time that such an incident has occurred -- the vehicle has lurched four times previously. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2896	CAMRY	2003	11/30/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on November 16, 2009 and other unknown dates, the vehicle exhibited unintended acceleration while decelerating and turning.
2897	TUNDRA	2005	11/30/2009	Customer called regarding her 2005 Toyota Tundra. Specifically, customer claims that in November 2009, she ran into a pole after her gas pedal got stuck and she had trouble stopping the vehicle.
2898	AVALON	2005	11/30/2009	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on November 24, 2007, while he was driving approximately 65-70 MPH on a two lane freeway, his vehicle began to speed up. Customer claims that when he first applied on the brakes, the vehicle would not stop, he shifted the car into neutral, and shut the engine off. Customer claims that the unintended acceleration occurred while the vehicle was already in motion.
2899	CAMRY	2009	11/30/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in November 2009 she was driving on the highway and the vehicle began pulling forward even though she was not pressing the accelerator. She drove home with her foot on the brake because the vehicle continued to accelerate on its own. Customer further claims that it was not a floor mat issue because she removed them six months prior. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2900	CAMRY	2005	11/30/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, his wife was driving the vehicle in a parking lot when it surged and increased in speed. Customer further claims that his wife tried to apply the brakes but that failed to slow the car. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2901	CAMRY	2004	11/30/2009	Customer emailed regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date in the spring, her mother was driving when the accelerator locked, causing the vehicle to collide into two fences. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2902	PRIUS	2005	11/30/2009	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2903	4RUNNER	2008	11/30/2009	Customer called regarding her 2008 Toyota 4Runner. Specifically, customer claims that on an unknown date the accelerator went down on its own.
2904	Camry	2007	11/30/2009	Customer emailed regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates, his vehicle unintentionally accelerated.
2905	Camry	2008	11/30/2009	Customer emailed regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates, when she pressed the gas pedal her vehicle hesitated and then revved. Customer further claims that when she braked, the vehicle hesitated and then braked hard. Customer claims that the revving and delayed braking occurred while the vehicle was already in motion.
2906	RAV 4	2005	11/30/2009	Customer called regarding her 2005 Toyota RAV4. Specifically, customer claims that on November 11, 2009 the vehicle accelerated over a parking barrier and hit two other vehicles while she was pulling into a parking stall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2907	PRIUS	2009	11/30/2009	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 5/29/09, the vehicle unintentionally accelerated and crashed into her house. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2908	CAMRY	2005	11/30/2009	Customer called regarding her 2005 Camry STD. Specifically, customer claims on a unknown date her vehicle experienced several instances of lurching forward. Customer further claims this acceleration caused her to hit a curb, a handicap sign, and some trees. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2909	CAMRY	2009	11/30/2009	Customer's wife called regarding customer's 2009 Toyota Camry. Specifically, customer's wife claims that on May 10, 2009 the vehicle's accelerator pedal got stuck causing the vehicle to take off into a building when she was turning into a parking space. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2910	CAMRY	2006	11/30/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that in December 2008, she was about to park her vehicle and had her foot on the brake, when the vehicle lurched forward. Customer further claims that she has had this problem occur from time to time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2911	TUNDRA	2008	11/30/2009	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle accelerated unintentionally. Customer further claims that while driving at 5-10 mph, the vehicle accelerated up to 55 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2912	TACOMA	2007	11/30/2009	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims that the vehicle suddenly unintentionally accelerated on 11/16/2009 which caused an accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2913	CAMRY	2008	11/30/2009	Granddaughter called on behalf of grandmother regarding her 2008 Toyota Camry. Specifically, granddaughter claims that in July 2009 the vehicle continued to accelerate after her grandmother applied the brakes and rearended another vehicle. Granddaughter claims that the sudden acceleration occurred while the car was already in motion.
2914	AVALON	2006	11/30/2009	Customer called regarding a letter she wrote about issues with her 2006 Toyota Avalon Limited. Specifically, customer claims that on November 21, 2009 she was involved in a car accident while traveling 55 mph using cruise control. Customer claims that the vehicle in front of her was slowing down to make a turn, customer went to apply brakes and vehicle did not stop. The vehicle could not be inspected because it was repaired. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2915	CAMRY	2008	11/30/2009	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on November 27, 2009 the vehicle took off and ran into the road median when she went to accelerate from a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2916	ES350	2008	11/30/2009	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on the Saturday prior to November 30, 2009, while driving over railroad tracks, her vehicle began to accelerate and make a rev sound. Customer claims that she had her foot on the brake, which slowed her vehicle down enough to keep it under control, but was not able to sop the vehicle until it was in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2917	TACOMA	2009	11/30/2009	Customer called regarding her 2009 Toyota Tacoma Prerunner. Specifically, customer claims that on November 15, 2009, her vehicle unexpectedly accelerated to 90 miles per hour on the interstate. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2918	PRIUS	2008	11/30/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on 7/00/09, the vehicle unintentionally accelerated and crashed into a wall.
2919	ES 330	2005	11/30/2009	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates the vehicle lunged forward attempting to park, causing it to strike another car.
2920	TACOMA	2004	11/30/2009	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims that his vehicle has accelerated on its own three (3) times since he purchased the vehicle. Customer further claims that this problem is caused by his accelerator getting stuck.
2921	CAMRY	2008	11/30/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 12/16/2008 he was coming to a stop light but could not stop the vehicle because the carpet became lodged against the gas pedal and he rearended another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2922	SCION XB	2008	11/30/2009	Customer called regarding her 2008 Scion XB. Specifically, customer claims that on an unknown date that when she started the vehicle it accelerated out of control.
2923	SCION tC	2007	12/1/2009	Customer called regarding her 2007 Toyota Scion TC. Specifically, customer claims that on an unknown date while approaching a stop she took her foot off accelerator, pushed the brake, and the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2924	AVALON	2007	12/1/2009	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle intermittently surged when she took her foot off of the gas.
2925	CAMRY	2010	12/1/2009	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 11/15/09 he was driving on the freeway approximately 45-50 mph and put the vehicle in cruise control when it began to surge. She applie the brakes but the vehicle did not slow down, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2926	TUNDRA	2008	12/1/2009	Customer called regarding her 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle would not stop when her husband pressed the brakes at a stop sign and he rear-ended another vehicle. Customer further claims that her husband had to shift into neutral and shut the vehicle off to get it to stop.
2927	CAMRY	2009	12/1/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date, he was driving on the highway and pressed the accelerator pedal to pass another vehicle, and the pedal did not "retreat." Customer further claims that as a result, the vehicle sped up to 60 mph, and that he was able to stop the vehicle after throwing it into neutral and hitting the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2928	IS250	2008	12/1/2009	Customer called about his 2008 Lexus IS 250. Specifically, customer claims that on an unknown date, the car suddenly jerked. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2929	CAMRY	2005	12/1/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date a year and a half ago, she had concerns with the vehicle accelerating unintentionally.
2930	CAMRY	2005	12/1/2009	Customer called regarding his mother's 2005 Toyota Camry. Specifically, customer claims that on November 14, 2009, his mother was driving and making a turn when the vehicle accelerated on its own. Customer further claims that she attempted to apply the brakes but the vehicle did not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2931	CAMRY	2007	12/1/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on two unknown dates while she was driving the vehicle jerked and sped up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2932	CAMRY	2009	12/1/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on November 30, 2009, she was driving out of her driveway when the vehicle began to accelerate, causing the vehicle to collide with the sidewalk and a tree. Customer further claims that she took her left foot off of the brake and the vehicle shot across the street. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2933	CAMRY	2002	12/1/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date her vehicle suddenly accelerated.
2934	CAMRY	2010	12/1/2009	Customer called regarding his 2010 Toyota Camry Sedan. Specifically, customer claims that in November 2009 he was backing out of a parking space when the vehicle suddenly lunged backwards, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2935	CAMRY	2007	12/1/2009	Customer emailed regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle suddenly accelerated while at a stop light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2936	SC 400	1998	12/1/2009	Customer called regarding her 1998 Lexus SC 400. Specifically, customer claims that on unknown dates she had a consistent problem with acceleration.
2937	TACOMA	2005	12/1/2009	Customer called regarding 2005 Toyota Tacoma Prerunner. Specifically, customer claims that he has been in two (2) crashes related to unintended acceleration. Customer claim that on May 22, 2009, the vehicle ran into a tree after it accelerated by itself, injuring the customer and damaging the vehicle.
2938	SIENNA	2005	12/1/2009	Customer wrote regarding his 2005 Toyota Sienna. Specifically, customer claims that the vehicle has accelerated out of control on two separate occasions. Customer further claims that on both occasions, the RPMs raced above 5000 and that application of the brakes did not stop the vehicle.
2939	CAMRY	2007	12/1/2009	Customer's wife called regarding customer's 2007 Toyota Camry. Specifically, customer claims that on two unknown dates the vehicle jerked and sped up. Customer further claims that on an unknown date he was pulling into his garage slowly and the vehicle lunged ahead and was damaged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2940	ES 330	2006	12/1/2009	Customer called regarding his 2006 Lexus ES 330. Specifically, customer claims that in July 2009 vehicle exhibited unintended acceleration, causing an accident.
2941	TACOMA	2008	12/1/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle accelerated unintentionally when he attempted to stop. Customer further claims that he had to shift into neutral and shut the vehicle off to get it to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2942	PRIUS	2005	12/1/2009	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates there was a minor surge in the acceleration and he had to use the brake to stop the vehicle. Customer further claims that on unknown dates when driving downhill and pressing on the brakes, the vehicle slowed down to about 10 mph, and then the vehicle jumped forward and he had to press harder on the brakes to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2943	HIGHLANDER	2005	12/1/2009	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle accelerated abruptly and that he was able to eventually stop the vehicle by applying the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2944	TACOMA	2006	12/1/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on November 29, 2009 the vehicle surged when he pressed the resume button on the cruise control and accelerated when he pressed the brakes to disengage the cruise control, going from 50 mph to approximately 85 to 95 mph. Customer further claims that the vehicle went off the road, and that he was able to slow it down by shifting into neutral, then shifting into park and shutting off the ignition. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2945	TACOMA	2005	12/1/2009	Customer called in regarding a 2005 Toyota Tacoma. The customer claims the vehicle suddenly unintentionally accelerated on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle was already in motion at the time of the sudden acceleration.

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2946	CAMRY	2003	12/1/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date he put the vehicle into reverse and experienced sudden acceleration although his foot was on the brake and hit a wall behind him. Customer further claims that after hitting the wall, the vehicle traveled another 50 feet and hit a pole; after placing the vehicle in drive, it accelerated forward and hit a wall.
2947	CAMRY	2007	12/1/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle began to surge while she was pulling into a garage. Customer pressed both feet on the brake and the vehicle stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2948	CAMRY	2005	12/1/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on November 16, 2009, she was turning left when the vehicle suddenly sped up, causing her to hit a lamp post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2949	CAMRY	2002	12/1/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on October 23, 2009, while his wife was going in reverse, the accelerator got stuck and the vehicle backed into the woods and was totaled.
2950	CAMRY	2004	12/1/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that about two years ago, her mother was driving the vehicle and pulled out of a gas station when the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2951	IS350	2007	12/1/2009	Customer called regarding her 2007 Lexus IS 350. Specifically, customer claims that in May 2007 the vehicle surged forward when she was parking, causing the vehicle to hit a speed bump and then a fence and then flip over. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2952	CAMRY	2004	12/1/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that approximately two weeks ago, she had a concern with her vehicle lunging forward for no apparent reason.
2953	IS350	2006	12/1/2009	Customer called about his 2006 Lexus IS 350. Specifically, customer claims that on an unknown date, the car's accelerator got stuck causing him to hit a truck in a parking lot. Customer claims the sudden acceleration happened while the vehicle was already in motion.
2954	TUNDRA	2007	12/1/2009	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle throttle stuck while he was driving on the freeway at 65 mph. Customer further claims that the vehicle reached a speed of 100 mph, and that he was pulled over by the police for speeding. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2955	SIENNA	2008	12/2/2009	Customer called regarding his 2008 Toyota Sienna. Specifically, customer claims that the vehicle accelerated when customer took his foot off the brake, shooting forward and running through his garage door. Customer states that he was not injured but that the vehicle and the garage were damaged in the incident. Customer claims that he was able to stop the vehicle by applying the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2956	CAMRY	2002	12/2/2009	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that December 2, 2009 his wife was driving the vehicle and was 5 feet in front of the garage door when the vehicle experienced unintended acceleration and hit the garage door.
2957	AVALON	2007	12/2/2009	Customer called regarding her 2007 Toyota Avalon XL. Specifically, customer claims that on unknown dates, her vehicle accelerated twice, and on both occasions she had to depress the brakes to slow the vehicles. Customer did not have the vehicle inspected, but does not believe the accelerations were due to the floor mats.
2958	AVALON	2005	12/2/2009	Customer called regarding 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, customer experienced sudden acceleration. Customer claims that while exiting a parking lot, the vehicle suddenly accelerated. Customer claims that she was not sure if she pressed the gas pedal or brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2959	TACOMA	2006	12/2/2009	Customer called in regarding a 2006 Toyota Tacoma. The customer claims the vehicle suddenly unintentionally accelerated on 10/11/2009, which caused an accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
2960	PRIUS	2006	12/2/2009	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle occasionally slightly surged, often when starting up the vehicle.
2961	GS 400	1999	12/2/2009	Customer called regarding his 1999 Lexus GS 400. Specifically, customer claims that on unknown dates that when he stepped on his brake pedal his vehicle accelerated.

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2962	SIENNA	2009	12/2/2009	Customer called regarding her 2009 Toyota Sienna LE 7 Pass. Specifically, customer claims that on an unknown date she gently placed her car in reverse and the car accelerated backwards very abruptly. Customer further claims her car then struck the neighbors house. An FTS inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
2963	CAMRY	2007	12/2/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that about a year ago, he was approaching a stop light and could not stop his vehicle. As a consequence, customer claims that he was struck by another vehicle. Customer further claims that he was in another accident in August 2009 in which his vehicle was totaled. Specifically, customer claims that he was driving and could not stop at a stop sign, causing him to collide with a truck.
2964	COROLLA	2005	12/2/2009	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date she was stopped in her garage with her foot on the brake when the vehicle idled high and surged through the garage wall and into the bedroom of her guest house. Customer further claims that on unknown dates the vehicle surged three additional times since the accident. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2965	TACOMA	2007	12/2/2009	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on December 1, 2009 the vehicle shot forward when he pressed the brakes to let another vehicle pass by him in a parking lot, causing him to hit the other vehicle. Customer further claims that on unknown prior dates the vehicle revved up at random. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2966	RX 330	2006	12/2/2009	Customer called regarding his 2006 Lexus RX 330. Specifically, customer claimed that on an unknown date while his wife was parking the vehicle surged forward and overcame braking power. Customer futher claimed that the vehicle hit the vehicle in front of it.
2967	COROLLA	2008	12/2/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration to 15-20 mph while she was driving at 5 mph. Customer further claims that the vehicle would not stop when she pressed the brakes, and that she turned the vehicle into her mother's yard. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2968	TACOMA	2006	12/2/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that in July 2009 the vehicle surged and accelerated suddenly into a wall while he was driving at approximately 5 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2969	CAMRY	2002	12/2/2009	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claimed that on an unknown date the vehicle began racing while he had brakes on the floor. Customer futher claimed that he had to put the car in neutral.
2970	SIENNA	2005	12/2/2009	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on November 21, 2009, her daughter was driving the vehicle and was parking the vehicle when the accelerator "ran on its own," causing the vehicle to hit an ice machine and crash into the windows of a nearby store. Customer further claims that her daughter is sure that she put the vehicle in park before the incident occurred. Customer states that the engine raced loudly during the incident. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2971	CAMRY	2004	12/2/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, her husband was stopping to park the vehicle when it lurched forward. Customer further claims that he was able to stop the vehicle by pushing on the brake.
2972	TACOMA	2004	12/2/2009	Customer called regarding his 2004 Toyota Tacoma. Specifically, customer claims that he has experienced unexpected acceleration in the vehicle. Customer further claims that on November 30, 2009, he was traveling at about 15 miles per hour when he felt as if he needed to move to the side of the road because the air conditioning unit was engaging. Customer further claims that the vehicle has accelerated five (5) times when he did not press on the gas pedal. Customer states that this problem often occurs when the brakes are being applied. Customer claims that unintended acceleration occurs when the vehicle is already in motion.

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2973	RAV 4	2005	12/2/2009	Customer called regarding his 2005 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle suddenly accelerated from 62 mph to 80 mph while driving with cruise control. Customer further claims that he pressed the brake and turned off the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2974	CAMRY	2007	12/2/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on November 28, 2009, his mother was driving the vehicle, and was approaching an intersection when she collided with a pole and other vehicles because she tried to apply the brakes but nothing happened. Customer claims that his mother was injured in the collision.
2975	TACOMA	2008	12/2/2009	Customer called regarding his 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on December 1, 2009 the vehicle experienced sudden acceleration. A Field Technical Specialist (FTS) inspected the vehicle.
2976	PRIUS	2008	12/2/2009	Customer called regarding her 2008 Toyota Prius. Specifically, customer claims that on November 24, 2009 the vehicle surged forward. A Field Technical Specialist (FTS) inspected the vehicle.
2977	CAMRY SOLARA	2008	12/2/2009	Customer called regarding his 2008 Toyota Camry Solara. Specifically, customer claims that on an unknown date, his wife was driving the vehicle into the garage when it accelerated on its own. Customer further claims that his wife tried to brake but that failed to slow the vehicle, which went through the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2978	IS250	2009	12/2/2009	Customer called regarding her 2009 Lexus IS 250. Specifically, customer claims that on December 1, 2009 the vehicle leaped ahead while she was stopped. Customer further claims that she put the vehicle in neutral and stepped on the brakes and ended up in the middle of the road. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2979	ES 300	2003	12/2/2009	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on unknown dates her accelerator got stuck intermittently.
2980	PRIUS	2008	12/2/2009	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, customer was driving the vehicle on the highway with cruise control on, when she got to a hill and the vehicle was not able to keep up speed. Customer further states she switched out of cruise control and tried depressing the accelerator, but the vehicle continued to lose speed until it suddenly surged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2981	HIGHLANDER	2004	12/2/2009	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on September 1, 2009 the vehicle accelerator stuck open and the vehicle jumped a curb and ran into a parked vehicle while she was backing out of a parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2982	CAMRY	2008	12/2/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that, dates unknown, his vehicle accelerates as if the cruise control is on. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2983	CAMRY	2010	12/2/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer wants further information regarding the floor mat advisory. Customer claims that his vehicle has accelerated at least nine (9) times when he attempted to brake. The details of the underlying incidents are unclear.
2984	IS350	2008	12/2/2009	Customer called regarding her 2008 Lexus IS 350. Specifically, customer claims that on an unknown date, the vehicle was jerking.
2985	PRIUS	2008	12/2/2009	Customer called regarding his 2008 Toyota Prius Hybrid. Specifically, customer claims that on November 19, 2009, while pulling into a hotel, customer hit the brakes to slow down to enter the loading area, the vehicle accelerated into a trash truck, resulting in \$2500 in damages. Customer further claims that on November 5, 2009, while pulling into parking garage, vehicle jumped forward and he scraped his right passenger side on a metal railing. Customer further claims the vehicle has had a sudden acceleration a total of 4 times since ownership. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2986	AVALON	2007	12/3/2009	Customer called regarding her 2007 Toyota Avalon Touring. Specifically, customer claims that on or about three months prior to December 3, 2009, while driving, her cruise control engaged and the vehicle suddenly accelerated. Customer further claims that on November 29, 2009, the vehicle accelerated again while on cruise control. Customer claims the floor mats are in the vehicle but that they are secured. Customer has not scheduled an appointment with the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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2987	CAMRY	2009	12/3/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that the vehicle has revved on its own three (3) times. Customer further claims that the vehicle jerks forward when it is not in gear. Customer claims that her floor mats are secured by clips, and that she has removed the floor mats but the problem keeps occurring.
2988	TACOMA	2007	12/3/2009	Customer called regarding her 2007 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle lunged forward 3 to 4 inches when stopped a stoplight with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
2989	PRIUS	2010	12/3/2009	Customer called in regarding a 2010 Toyota Prius. The customer claims the vehicle suddenly unintentionally accelerates and has done so on several unspecified dates. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurs while the vehicle is already in motion.
2990	CAMRY	2005	12/3/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on May 19, 2007, her husband was parking the vehicle and hit the brake pedal, but the vehicle accelerated and hit two other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2991	AVALON	2008	12/3/2009	Customer called regarding his 2008 Toyota Avalon Limited. Specifically, customer claims that on October 9, 2009 he experienced some sudden acceleration and was not able to stop it but claims it had nothing to do with the floor mats. Customer further claims that he took the vehicle to the dealer, and the dealer could not duplicate the condition. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2992	CAMRY	2010	12/3/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that when he is driving the vehicle, he notices that the accelerator pedal does not come off and the vehicle continues to accelerate when he is trying to pass another vehicle.
2993	4RUNNER LIMITED	2003	12/3/2009	Customer called regarding her 2003 Toyota 4Runner Ltd. Specifically, customer claimed that on November 4, 2009, while merging onto a highway, the vehicle began to shake and the accelerator drooped to the floor, causing the vehicle to take off to 90 pmh. Customer futher claimed that the brakes would not stop the car and she had to put it into neutral. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
2994	CAMRY	2007	12/3/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that his mother was driving the vehicle into a parking lot when it accelerated unexpectedly, causing her to crash into a store. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2995	CAMRY	2007	12/3/2009	Customer called regarding hier 2007 Toyota Camry. Specifically, customer claims that her son was driving the vehicle on October 7, 2008, and was involved in an accident because he applied the brakes but the vehicle did not stop.
2996	ES 330	2004	12/3/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date she was backing out of her driveway and the vehicle accelerated out of control as a person was getting into it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
2997	CAMRY	2009	12/3/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that his wife ran into a building and that this accident was caused by the accelerator. Customer states that the incident occurred in April or May 2009. Customer claims that his wife was pulling into o a parking lot when the vehicle accelerated out of control. Customer further claims that when his wife slammed her foot on the brake, the vehicle just sped up. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
2998	PRIUS	2007	12/3/2009	Insurance agent called regarding customer's 2007 Toyota Prius. Specifically, the customer claims that on 2/00/09, the vehicle unintentionally accelerated and crashed into another vehicle and then an orchard. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
2999	PRIUS	2008	12/3/2009	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 12/09/09, the vehicle unintentionally accelerated and was in an accident.
3000	CAMRY	2005	12/3/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that in the past eighteen months, her parents have had multiple incidents of unintended acceleration. Customer further claims that the vehicle has unintentionally accelerated both while moving forward and reversing.
3001	CAMRY	2008	12/3/2009	Daughter called on behalf of her mother who owns a 2008 Toyota Camry. Specifically, daughter claims that on two occasions, dates unknown, her mother's vehicle experienced a sudden acceleration.
3002	CAMRY	2003	12/3/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that six months ago, his wife was driving the vehicle when it accelerated in a private parking lot.

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3003	MATRIX	2006	12/3/2009	Customer called regarding her 2006 Toyota Corolla Matrix. Specifically, customer claims that on October 31, 2009 the vehicle accelerated on its own when she was going in reverse, causing her to run into a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3004	TACOMA	2008	12/3/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine accelerated when he shifted from second to first gear as he approached a stop sign. Customer further claims that this has happened six times. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3005	CAMRY	2002	12/3/2009	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date he was leaving a parking garage and had his foot on the brake when the car took off and jumped a curb, down an embankment, and hit a tree.
3006	TACOMA	2006	12/4/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on December 4, 2009 the vehicle's accelerator stuck and the vehicle lunged forward when pulling into his garage, causing him to hit the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3007	AVALON	2006	12/4/2009	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, his wife experienced unintended acceleration on two occasions. Customer further claims that he took the vehicle to the dealer and the dealer tied the floor mats to the seat frame. Customer is concerned with finding the root cause of the acceleration.
3008	CAMRY	2007	12/4/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle suddenly accelerated and ran into a post when he hit the gas pedal while moving in reverse. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3009	AVALON	2006	12/4/2009	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that in October 2009 the vehicle jumped out of control when she pulled up behind a truck, causing the vehicle to run into the truck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3010	CAMRY	2008	12/4/2009	Customer's husband called regarding her 2008 Toyota Camry LE. Specifically, customer's husband claims that on December 3, 2009, the vehicle shot forward and jumped over the curb. Customer's husband further claims that on an unknown date that she pressed on the brakes and the vehicle shot forward and hit 3 other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3011	CAMRY	2008	12/4/2009	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 12/03/2009 her husband was stopped at a stop sign with foot on the brake when the vehicle continued to race and rev. Customer further claims that a few days earlier the vehicle would not accept gas when pressing accelerator pedal.
3012	CAMRY SOLARA SE	2002	12/4/2009	Customer called regarding her 2002 Toyota Camry Solara. Specifically, customer claims that on December 4, 2009 the vehicle accelerated on its own and ran into her grandmother's house and 2 neighbors' fences. Customer claims the vehicle was in drive when it accelerated ahead. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims the sudden acceleration occurred while the vehicle was at rest.
3013	4RUNNER	2007	12/4/2009	Customer emailed regarding her 2007 Toyota 4Runner. Specifically, customer claims that in March 2009 she had an accident as a result of unintended acceleration. Customer further claims that on unknown dates the accelerator got stuck.
3014	MATRIX	2007	12/4/2009	Customer called regarding her 2007 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle momentarily increased in speed and jumped the curb as she was pulling into a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3015	CAMRY	2005	12/4/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has been having concerns with the vehicle's acceleration once or twice every month. Customer further claims that ever since she purchased the vehicle, she's experienced on multiple occasions the vehicle jumps forward and accelerates on its own.
3016	IS250	2009	12/4/2009	Customer called regarding his 2009 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle was involved in an accelerator surge incident.
3017	CAMRY	2004	12/4/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, his wife was driving and was at a red light, and when she accelerated the vehicle accelerated faster than normal.

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3018	PRIUS	2010	12/4/2009	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but on three separate incidences, the vehicle experienced unintended acceleration that led to an accident. Customer claims that while driving during hurricane, wind caused trash cans to fall in front of vehicle, and she could not stop. Customer further claims that the second incident happened when she was backing out of a driveway and applied the brakes, but they did not work; she felt a lurch in the engine, causing her to hit a tree. Customer further claims the third incident happened while she was making a right turn and there were bushes sticking out from the side of the curb, so she tried to hit the brakes to take the curve more slowly, she felt a lurch in the vehicle causing her to hit a bush. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3019	TACOMA	2005	12/4/2009	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 5/30/2007, which caused an accident. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3020	TACOMA	2006	12/4/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle tried to accelerate on its own while he was at a stop sign. Customer further claims that he had to press the brakes very hard in order to keep the vehicle from accelerating.
3021	COROLLA	2008	12/4/2009	Customer called regarding her 2008 Toyota Corolla LE. Specifically, customer claims that the gas pedal has gotten stuck four times on unknown dates. An FTS inspected the vehicle. Customer claims the sticking occurred while the vehicle was already in motion.
3022	SIENNA	2006	12/4/2009	Customer wrote regarding his 2006 Toyota Sienna. Specifically, customer claims that he was driving the vehicle on the interstate and pressed the gas pedal all the way to the floor in addition to turning on the cruise control. Customer further claims that after he had done this, the car began to accelerate and could not be slowed through application of the brakes. Customer claims that he was able to turn the ignition off and coast off the highway. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
3023	CAMRY	2007	12/4/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on December 4, 2009, she was exiting the freeway and the vehicle surged forward. Customer further claims that after she pulled over and was stopped, the vehicle surged forward again. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
3024	CAMRY	2006	12/5/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on December 4, 2009, she was backing the vehicle out of the driveway when the accelerator pedal got stuck, causing the vehicle to back into a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3025	GS 300	2006	12/5/2009	Customer called regarding her 2006 Lexus GS 300. Specifically, customer claims that on an unknown date she experienced unintended acceleration.
3026	CAMRY	2007	12/5/2009	Customer wrote letter regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated too quickly when in lower gears. Customer further claims that vehicle intermittently lurched forward when beginning to accelerate. Customer further claims that she heard a rotational sound coming from the front of the car near the transaxle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3027	CAMRY	2007	12/7/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was traveling on a residential street when the accelerator pedal became stuck. Customer further claims that she was ticketed for speeding as a result of the incident.
3028	CAMRY	2002	12/7/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on October 23, 2009, his wife was going in reverse and the accelerator got stuck and the engine was revving, causing the vehicle to back into the woods.
3029	ES350	2007	12/7/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on November 18, 2009, while his wife's vehicle was pulling into a parking lot, it accelerated. Customer claims that the vehicle hit a light pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3030	IS250	2006	12/7/2009	Customer called regarding his 2006 Lexus IS 250. Specifically, customer claims that on an unknown date, his wife was involved in an accident. Customer claims that the vehicle accelerated on its own, she put two feet on the brake and it would not stop. Customer claims that she hit a tree to stop the vehicle.
3031	CAMRY	2005	12/7/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle lurched forward.

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3032	CAMRY	2009	12/7/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that on December 5, 2009, his wife was driving the vehicle when the vehicle began accelerating on its own. Customer further claims that the vehicle drove into a tree as a result of the unintended acceleration. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3033	CAMRY	2005	12/7/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has been having concerns with unintended acceleration.
3034	CAMRY	2008	12/7/2009	Customer called regarding her 2008 Toyota Camry SE. Specifically, customer claims that on December 6, 2009, the vehicle jerked forward. She further claims that the engine revved up and eventually turned off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3035	CAMRY	2005	12/7/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that in both October 2009 and on December 1, 2009, he experienced the vehicle suddenly accelerate when he tried to bring the vehicle to a stop.
3036	CAMRY	2006	12/7/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date, she was pulling into a parking space when the vehicle surged and ran away, hitting another vehicle. Customer further claims that on another occasion, she has hit a wall while trying to pull into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3037	TACOMA	2008	12/7/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle's engine revved up and the vehicle moved slightly forward when he was at a stop sign with his foot on the brake. Customer further claims that the vehicle suddenly accelerated about 5 mph when he was driving downhill with his foot on the brake. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3038	PRIUS	2004	12/7/2009	Customer emailed regarding her 2004 Toyota Prius. Specifically, customer claims that on five unknown dates, her vehicle suddenly accelerated when her foot first touched the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3039	CAMRY	2005	12/7/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that two or three years earlier, he was pulling into a parking lot when his vehicle shot out and hit another vehicle. Customer further claims that he was unable to stop the vehicle even though he had his foot on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3040	CAMRY	2005	12/7/2009	Customer claims that on unknown dates his 2005 Toyota Camry suddenly and involuntarily accelerates while stopped at traffic lights. Customer claims that during these incidents his foot is firmly on the brake pedal.
3041	TACOMA	2006	12/7/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle does not return to idle when shifting gears at highway speeds. FTS did not inspect the vehicle. The customer claims the idle problem occurs while the vehicle is already in motion.
3042	PRIUS	2007	12/7/2009	Customer called regarding customer's 2007 Toyota Prius. Specifically, the customer claims that unknown dates, the vehicle unintentionally accelerated.
3043	PRIUS	2008	12/7/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on 9/25/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3044	CAMRY	2006	12/7/2009	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates, her vehicle's gas pedal got stuck, causing the vehicle to keep going. Customer further states that she was not in any accidents.
3045	CAMRY	2002	12/7/2009	Customer called regarding his 2002 Toyota Camry SE. Specifically, customer claimed that on an unknown date while driving on the freeway the customer slowed down for traffic and put the vehicle in neutral when the vehicle accelerated. Customer further claimed that he then braked and the check engine light came on. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
3046	CAMRY	2007	12/7/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in January 2008, he was driving 65 mph when the vehicle unintentionally accelerated to 100 mph. Customer further claims that when he stepped on the brake, the vehicle's acceleration increased, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3047	CAMRY	2008	12/7/2009	Customer and customer's wife called regarding his 2008 Toyota Camry SE (V6). Specifically, customer claims that on May 28, 2009, the vehicle accelerated on its own and hit another vehicle. Customer and customer's wife did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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3048	4RUNNER	2006	12/8/2009	Customer called regarding her 2006 Toyota 4Runner. Customer claims that on December 7, 2009, the gas pedal stuck but she was able to put the vehicle in neutral and stop the vehicle.
3049	CAMRY	2009	12/8/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that when he steps on the throttle, the vehicle hesitates at low or high speeds.
3050	COROLLA	2009	12/8/2009	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that his vehicle was experiencing acceleration concerns. Customer further claims that when he drove the vehicle, he had to hold the brake as hard as he could to keep the vehicle from lunging forward.
3051	TACOMA	2008	12/8/2009	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle sudden unintentionally accelerated which caused an accident on 12/7/2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3052	CAMRY	2002	12/8/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on December 3, 2009, his wife was driving the vehicle and was parking in the driveway when the vehicle accelerated on its own from approximately 5 mph. Customer further claims that the vehicle went from the front yard to the back and hit a neighbor's tree, and that it did not respond to brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3053	TACOMA	2007	12/8/2009	Customer's attorney called regarding customer's 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on May 8, 2009 the vehicle would not stop when she pressed on the brakes while driving on the freeway. Customer further claims that she has continued to experience unintended acceleration two to three times a week. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3054	IS250	2006	12/8/2009	Customer called regarding her 2006 Lexus IS 250. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own, and crashed. Customer claims that she was trying to park her vehicle but it would not stop.
3055	PRIUS	2006	12/8/2009	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on 11/30/09, the vehicle unintentionally accelerated into another vehicle. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3056	CAMRY	2005	12/8/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 23, 2009, she was pulling into a parking spot when her vehicle abruptly accelerated, causing the vehicle to collide with a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3057	COROLLA	2006	12/8/2009	Customer emailed regarding his 2006 Toyota Corolla. Specifically, customer claims that in November 2009 he was parallel parking and his foot was on the brake when the vehicle accelerated. Customer further claims that he has experienced sudden acceleration on about five occasions.
3058	CAMRY	2006	12/8/2009	Customer emailed regarding his 2006 Toyota Camry. Specifically, customer claims that in April, his accelerator stuck.
3059	ES350	2007	12/8/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date her vehicle jerked backwards as she was backing out of her garage, causing her to hit and break off the driver side mirror and scratch the door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3060	CAMRY	2008	12/8/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 12/6/2009 his vehicle accelerated on its own. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3061	CAMRY	2007	12/8/2009	Customer emailed regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she started her car in her driveway and the car surged forward when she put it into drive even though she had not touched the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3062	COROLLA	2010	12/8/2009	Customer called regarding her 2010 Toyota Corolla. Case documented under file #0912104821.
3063	ES350	2008	12/8/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on or about November 25, 2009, while driving, the vehicle suddenly accelerated. Customer claims that the vehicle lurched about 5-10 feet. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3064	CAMRY	2010	12/8/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that the "accelerator took off" in December 2009, and that he was able to stop the vehicle by pressing the brake and the gas at the same time. Customer further claims that the brake and the gas pedal are too close to each other.

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3065	ES 330	2004	12/9/2009	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that in May 2007 vehicle exhibited unintended acceleration.
3066	CAMRY	2002	12/9/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date in late August or early September that she was pulling into her garage when the vehicle surged although she had her foot on the brake. Customer further claims that on an unknown date three months ago her aunt was driving a Toyota which surged and caused the vehicle to crash into her garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3067	RAV 4	2008	12/9/2009	Customer called regarding his 2008 Toyota Rav4. Specifically, customer claims that his vehicle suddenly accelerated on two occasions: once in June 2009, and once in November 2009. Customer states that he was sitting in traffic and was traveling at a slow speed when the vehicle "wanted to go" even though his foot was on the brake pedal. Customer claims that he had to apply extra pressure to the brake pedal in order to keep the vehicle at rest. Customer further claims that this problem happens intermittently.
3068	PRIUS	2009	12/9/2009	Customer called in regarding a 2009 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to specify the exact date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3069	CAMRY	2004	12/9/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that over Memorial Day weekend, she was driving home when the vehicle accelerated unexpectedly. Customer further claims that as a result of the sudden acceleration, her vehicle sped at 90 mph for approx. 30 seconds. Customer also claims that while driving, when she turns right the vehicle surges. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3070	COROLLA	2005	12/9/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates his vehicle accelerated when he stepped on the brake.
3071	COROLLA	2007	12/9/2009	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on an unknown date when he pulled into a parking space, the vehicle accelerated and the brakes were hard. Customer further claims that on December 8, 2009, he was driving at 30 mph and when he took his foot off the gas pedal the engine did not decelerate, and when he pressed the brakes, the brakes were hard.
3072	AVALON	2006	12/9/2009	Insurance agent called regarding customer's 2006 Toyota Avalon. Specifically, customer claims that on October 19, 2009 the vehicle unintentionally accelerated, lunged forward, and hit a gas main as she was parking at her condominium building. Customer further claims that the vehicle caught on fire and was totaled. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3073	CAMRY	2005	12/9/2009	Customer emailed regarding her 2005 Toyota Camry. Specifically, customer claims that she has been involved with two accidents with her vehicle, and that in both cases, she was pulling into a parking space when the vehicle would not stop.
3074	MATRIX	2007	12/9/2009	Customer called regarding her 2007 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration.
3075	SIENNA	2006	12/9/2009	Customer called regarding her 2006 Toyota Sienna. Specifically, customer claims that she has acceleration concerns about her vehicle. Customer claims that she has been experiencing acceleration for over a year. Customer further claims that at one point, her vehicle revved and accelerated more than it should have for the amount of force put on the gas pedal. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
3076	ES350	2008	12/9/2009	Customer called regarding her 2008 Lexus ES 350. Customer seeks assistance with an existing claim.
3077	FJ CRUISER	2007	12/9/2009	Customer called regarding her 2007 Toyota FJ Cruiser. Specifically, customer claims that on two unknown dates the vehicle continued accelerating after she released the gas pedal. Customer further claims that in the first incident she was going uphill and the vehicle continued accelerating for 5 seconds before she regained control. Customer further claims that in the second incident the vehicle continued to accelerate for 3-4 seconds when she passed a vehicle going 70 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3078	CAMRY	2005	12/9/2009	Customer emailed regarding her 2005 Toyota Camry. Specifically, customer claims that she has been involved with two accidents with her vehicle, and that in both cases, she was pulling into a parking space when the vehicle would not stop.
3079	CAMRY	2010	12/9/2009	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that in September 2009 the vehicle shot forward into his garage when he was pulling into his driveway at around 5 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3080	RAV 4	2007	12/9/2009	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle reversed quickly and the RPM shot up when she was backing out of a parking spot. Customer further claims that the vehicle had trouble stopping and that she was able to put the vehicle and neutral to stop it.
3081	CAMRY	2004	12/9/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on November 9, 2009, his father was driving and pulling into the driveway when the vehicle accelerated unintentionally. Customer further claims that the cause of the sudden acceleration was a stuck accelerator pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3082	CAMRY	2005	12/9/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on July 28, 2008, she was pulling into a parking spot when the vehicle accelerated. Customer further claims that she is sure she had her foot on the brake at the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3083	CAMRY	2009	12/9/2009	Customer called regarding his 2009 Toyota Camry Hybrid and 2010 Prius. Specifically, customer claims that on unknown dates both cars surge when he applies the brake at low speeds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3084	CAMRY	2007	12/9/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that there was a problem with his accelerator pedal. The details of the underlying incident are unclear.
3085	CAMRY	2004	12/9/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on April 12, 2009, he was driving and attempted to slow down for a stop light, but instead got into an accident.
3086	CAMRY	2004	12/9/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, she was driving at approx. 25 mph down a hill, and when she took her foot off of the gas the vehicle began to speed up. Customer further claims that when she applied the brakes, the vehicle slowed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3087	GS 430	2004	12/9/2009	Customer called regarding her 2004 Lexus GS 430. Specifically, customer claimed that in 2006 her vehicle surged and caused an accident.
3088	CAMRY	2009	12/9/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that she was in an accident in December 2009. Customer claims that when she was going up an incline, she felt the vehicle accelerate slightly. Customer further claims that she hit the brakes three (3) times, but the vehicle kept going faster. Customer claims that as a result of the unintended acceleration, she ran into a concrete wall in a parking garage. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3089	CAMRY	2004	12/9/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date, her vehicle floor mat got stuck under the gas pedal, causing the vehicle to accelerate at a high rate of speed.
3090	AVALON	2005	12/9/2009	Customer wrote regarding her 2005 Toyota Avalon. Specifically, customer claims that since she has owned the vehicle, she has experienced an occasional failure of the vehicle to move forward on occasion no response(failure to move forward) to stepping on the accelerator after brief slowing down during stop-n-go freeway traffic, then suddenly jerking forward as if choked-up throttle has suddenly become un-choked so to speak.
3091	CAMRY	2002	12/9/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that in May 2005 she was driving vehicle at 10 mph and tried to apply the brakes, which did not respond, causing her vehicle to impact two other vehicles and a tree. Customer further claims that she did not see the vehicle accelerate as she applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3092	COROLLA	2005	12/9/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates when stopped at a red light or stop sign, the vehicle accelerated on its own at tremendous speeds. Customer further claims that on January 18, 2010, he hit a pedestrian in the knees due to unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3093	CAMRY	2009	12/9/2009	Customer called regarding his 2009 Toyota Camry CE. Specifically, customer claims that on two unknown dates his vehicle had a dangerous accelerator surge. Customer did not specify if the sudden acceleration occurs while the vehicle is at full stop or already in motion.

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3094	PRIUS	2006	12/9/2009	Customer emailed regarding her 2006 Toyota Prius. Specifically, customer claims that on December 7, 2009, she was driving slowly into a parking space when the vehicle suddenly moved forward at a high rate of speed, and she stepped on the brake to stop the vehicle. Customer further claims that on an unknown date earlier in 2009 the same thing happened. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3095	MATRIX	2006	12/10/2009	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on June 15, 2009 the vehicle took off when his wife put her foot on the gas to turn left at a stop sign, causing her to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3096	RAV 4	2004	12/10/2009	Customer called regarding her 2004 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle had acceleration problems and the gas pedal stuck and the vehicle jumped and snapped. Customer further claims that on an unknown date she had to bump the curb to stop the vehicle.
3097	COROLLA	2007	12/10/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on December 7, 2009, she was pulling into the garage with her foot on the brake when the vehicle lunged forward and ran into a cupboard. Customer further claims that on unknown dates the vehicle experienced a jerking motion. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3098	PRIUS	2006	12/10/2009	Customer called regarding her 2006 Toyota Prius. Specifically, customer claims that on December 9, 2009, the vehicle had a slight surge when the vehicle was in reverse and her foot was on the gas pedal.
3099	CAMRY	2005	12/10/2009	Customer emailed regarding his 2005 Toyota Camry. Specifically, customer claims that in July 2009, he was driving at approx. 50 mph when the vehicle suddenly went out of control and got into an accident.
3100	CAMRY	2008	12/10/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 11/07/2009 his wife hit a freezer while pulling into their garage when the vehicle accelerated unexpectedly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3101	COROLLA	2009	12/10/2009	Customer called regarding 2009 Toyota Camry. Specifically, customer claims that the vehicle has accelerated three (3) times. The details of the underlying incidents are unknown.
3102	CAMRY	2010	12/10/2009	Customer wrote Toyota regarding 2010 Toyota Camry. Specifically, customer claims that when she slows down in the vehicle, her car begins to accelerate although she does not press the gas pedal. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
3103	ES350	2008	12/10/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, his vehicle unexpectedly accelerated. Customer claims that that the dealer concluded that there was nothing wrong with the vehicle after inspection.
3104	PRIUS	2004	12/10/2009	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated.
3105	COROLLA	2006	12/10/2009	Customer emailed regarding his 2006 Toyota Corolla. Specifically, customer claims that on November 24, 2009, he was driving at 70-75 mph on the highway when the car began to accelerate and would not slow down when he hit the brake. Customer further claims that he turned the car off and the acceleration stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3106	CAMRY	2008	12/10/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 12/03/2009 his father-in-law got into the vehicle and that it accelerated forward when he started the engine, hitting another parked vehicle. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while vehicle was at a full stop.
3107	AVALON	2008	12/10/2009	Customer called regarding his 2008 Avalon Limited. Specifically, customer claims that on an unknown date in 2008, his vehicle speed off at 100 mph. Customer further claims that the dealer was able to see grooves in the brakes from when the customer applied them, the dealer found nothing wrong with the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3108	COROLLA	2006	12/10/2009	Customer wrote a letter regarding her 2006 Toyota Corolla. Specifically, customer claims that in May 2008 she was stopped waiting to enter a highway when the vehicle surged. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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3109	CAMRY	2005	12/10/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, she was parking her vehicle and her foot was still on the brake when it accelerated, causing the vehicle to go over the curb and collide with a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3110	CAMRY	2005	12/10/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 10, 2009, her daughter was driving the vehicle and almost got into an accident.
3111	CAMRY	2008	12/10/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 11/11/2009 his wife was pulling the vehicle into the garage when the engine revved up and the vehicle collided with a freezer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3112	PRIUS	2005	12/10/2009	Customer emailed regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates his vehicle lunged forward on its own after starting up and idling for a few minutes without giving it any gas. Customer further claims that on an unknown date he had the oil changed and had just started it up and was standing in front of it when the engine raced and the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3113	4RUNNER	2007	12/10/2009	Customer emailed regarding his 2007 Toyota 4Runner. Specifically, customer claims that on an unknown date, he experienced unexpected acceleration while driving on the freeway and braking did not stop the acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3114	IS250	2008	12/10/2009	Customer called regarding her 2008 Lexus IS 250. Specifically, customer claims that on unknown dates the vehicle sometimes jumped when she accelerated hard.
3115	4RUNNER	2004	12/10/2009	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on December 8, 2009, he was entering the highway when the accelerator stuck and the vehicle reached approximately 80 mph. Customer further claims that hitting the brakes did not work, and did not stop until he shifted into neutral and then into park. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3116	SIENNA	2004	12/10/2009	Customer wrote regarding his 2004 Toyota Sienna. Specifically, customer claims that he has experienced problems with his accelerator. Customer claims that on or around November 2009, he experienced instantaneous, dramatic acceleration in his vehicle, and he states that he was only able to stop the vehicle by putting his full strength and both of his feet on the brake pedal. Customer states that he removed the floor mats in his vehicle after this incident.
3117	CAMRY	2007	12/10/2009	Customer emailed regarding her 2007 Toyota Camry. See case number 0912113504.
3118	CAMRY	2010	12/11/2009	Customer called regarding her 2010 Toyota Camry XLE V6. Specifically, customer claims that on an unknown date she came to a stop sign, the vehicle would surge backwards. Customer further claims after servicing, the vehicle continued to experience surging. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3119	CAMRY	2009	12/11/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that while backing out of a parking spot, his vehicle accelerated and he drove into a building. Customer further claims that his foot was on the brake but that did not work. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3120	PRIUS	2006	12/11/2009	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on 9/00/09, the vehicle unintentionally accelerated into another vehicle. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was not in motion.
3121	AVALON	2007	12/11/2009	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on November 28, 2009 his wife was driving the vehicle and while turning left, the vehicle sped up, his wife applied the brakes, but the vehicle would not stop. Customer further claims his wife hit another vehicle, she rolled twice, and was taken to the hospital but did not have many injuries. Customer claims that a similar incident had occurred previously. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3122	PRIUS	2008	12/11/2009	Customer called in regarding a 2008 Toyota Prius Touring. Specifically, the customer claims a neighbor's vehicle has issues with sudden unintended acceleration, but did not specify a date. FTS did not inspect the vehicle. The customer does not provide any other information.

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3123	TACOMA	2008	12/11/2009	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated which caused an accident on 12/8/2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3124	CAMRY	2007	12/11/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in the summer of 2008, she was in an accident because her vehicle would not stop. Specifically, customer claims that she was exiting a parking lot when she applied the brakes but could not stop. Customer claims that her vehicle collided with a pole, causing damage to her front bumper. Customer claims that she experienced one other incident of unintended acceleration before this incident.
3125	TACOMA	2006	12/11/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on December 10, 2009 the vehicle lunged forward while he was sitting at a stop sign with his foot on the brake. Customer further claims that the vehicle would have gone into the intersection had his foot not been on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3126	4RUNNER	2008	12/11/2009	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on November 25, 2009, his wife was driving on the highway at about 35 mph when the vehicle took off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3127	PRIUS	2010	12/11/2009	Customer called regarding his 2010 Toyota Prius. Specifically, customer claims that on an unknown date the vehicle revved up and lurched forward as he was coming to a red light with his foot on the brake.
3128	CAMRY	2005	12/11/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 8, 2009, she was pulling into a parking spot when the vehicle accelerated and hit a parking meter. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3129	SIENNA	2007	12/11/2009	Customer called regarding his 2007 Toyota Sienna. Specifically, customer claims that when he is accelerating, the vehicle feels as if it takes off rapidly. Customer further claims that when he is braking in an attempt to turn and accelerates after braking, the RPMs will go up and the vehicle will take off. A Field Technical Specialist (FTS) inspected the vehicle.
3130	AVALON	2007	12/11/2009	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that on September 17, 2009, she experienced some unintended acceleration while at home in her parking garage, causing damage to the front and side of the vehicle. Customer further claims that the incident has not happened since.
3131	CAMRY SOLARA	2005	12/11/2009	Customer called regarding her 2005 Toyota Camry Solara. Specifically, customer claims that on December 11, 2009, she was pulling into a parking space when the vehicle accelerated on its own and hit a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3132	PRIUS	2010	12/12/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to specify a date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
3133	RAV 4	2007	12/12/2009	Customer wrote a letter regarding her 2007 Toyota RAV4. Specifically, customer claims that on October 26, 2009 the vehicle surged forward on its own at high speed after she pulled into a parking space. Customer further claims that the vehicle jumped the curb and went through four feet of bushes. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3134	CAMRY	2007	12/12/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that the vehicle took off on its own. Customer states that it felt like the vehicle was shifting gears when the incident occurred.
3135	CAMRY SOLARA	2005	12/12/2009	Customer called regarding her 2005 Toyota Camry Solara. Specifically, customer claims that her vehicle keeps accelerating.
3136	PRIUS	2009	12/14/2009	Customer called regarding his 2009 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated and hit another vehicle. FTS inspected vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3137	CAMRY	2009	12/14/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 12/13/09, as he was coming to a stop sign, he braked but the vehicle accelerated approximately 1/4 mile before stopping. Customer further claims that he was driving 20-25mph at the time, and that he pressed the brake twice to get the car to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3138	CAMRY	2004	12/14/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on December 7, 2009, she was driving her vehicle into the garage when the vehicle accelerated "like crazy." Customer further claims that she could not stop the vehicle as she came up the drive way. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3139	CAMRY	2009	12/14/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 11/25/09, his daughter, who was driving the vehicle at the time, tried to brake at a stop sign but the vehicle accelerated, causing her to hit another vehicle in front of her. Customer initially claims that the vehicle, which has now been repaired, accelerated because of braking issues, but now claims that the floor mat became lodged underneath the pedals. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3140	ES350	2007	12/14/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, her vehicle experienced an acceleration issue.
3141	AVALON	2009	12/14/2009	Customer called regarding her 2009 Toyota Avalon XLS. Specifically, customer claims that on October 23, 2009, she experienced out of control acceleration and hit the back of a car turning left. Customer further claims, she was issued a ticket for following too closely. Customer also claims the floor mats were in place and still on the hook at the time of the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3142	ES350	2009	12/14/2009	Customer called regarding her 2009 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle experienced sudden acceleration and that there was no floor mat in the vehicle.
3143	ES 300	2003	12/14/2009	Customer called regarding his 2003 Lexus ES 300. Specifically, customer claims that on December 12, 2009 he was at a stop light when the vehicle seemed to start accelerating forward despite his foot being on the brake. Customer further claims the vehicle surged forward 5-10 feet and hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3144	PRERUNNER	2003	12/14/2009	Customer called regarding his 2003 Toyota Prerunner. Specifically, customer claimed that on an unknown date when driving and pulling into a parking space the vehicle suddenly accelerated and shot forward but did not hit anything. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3145	CAMRY	2009	12/14/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 5/21/09, she was making a left hand turn and pressed on the brake but the vehicle never slowed. Customer further claims that as a result, she ran into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3146	CAMRY	2009	12/14/2009	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on 11/18/09 his wife was moving the car in the driveway when it suddenly accelerated and crashed through the garage door. She cannot remember if she hit the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3147	SIENNA	2008	12/14/2009	Customer called regarding his 2008 Toyota Sienna. Specifically, customer claims that he was traveling at approximately 60 to 65 miles per hour when the gas pedal became stuck, causing the vehicle to accelerate to 85 or 90 miles per hour before he was able to shut off the vehicle. Customer states that the problem stopped when he reached down and grapped his floor mat and shut off the cruise control. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3148	CAMRY	2002	12/14/2009	Customer called regarding his 2002 Toyota Camry XLE. Customer claims that on an unknown date, while coming into a parking space, the vehicle took off, and he had to press hard on the brakes to stop it. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
3149	CAMRY	2005	12/14/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has experienced sudden acceleration problems with her vehicle for the past two years.
3150	ES350	2008	12/14/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, while parking his vehicle, it suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3151	CAMRY	2006	12/14/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date, he was pulling into a parking lot at approx. 5 mph when the vehicle accelerated on its own to 90 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3152	TACOMA	2006	12/14/2009	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer states that on an unknown date, he tried to brake as he was pulling his vehicle into the garage but the vehicle kept going, causing damage to the car. Customer further claims that his foot slipped off the brake and onto the gas pedal but that the vehicle accelerated more than it should have. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3153	IS250	2007	12/14/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, he had some acceleration issues.
3154	RAV 4	2007	12/14/2009	Customer wrote a letter regarding her 2007 Toyota RAV4. Specifically, customer claims that on October 26, 2009 the vehicle surged forward on its own at high speed after she pulled into a parking space. Customer further claims that the vehicle jumped the curb and went through four feet of bushes. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3155	PRIUS	2008	12/14/2009	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. FTS failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3156	COROLLA	2010	12/15/2009	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date there were electrical problems that affected the radio, clock, traction, locks, keyless entry and overhead lights. Customer further claims that there was a burning smell in the dashboard. An FTS inspected the vehicle.
3157	CAMRY	2004	12/15/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, he was stopped in traffic with his foot on the brake when suddenly his vehicle surged and lunged ahead. Customer further claims that the RPM on the vehicle raced. Customer claims that the sudden acceleration occurred while the vehicle was not in motion.
3158	CAMRY	2008	12/15/2009	Customer called regarding his 2008 Toyota Camry. Specifically, he claims that on unknown dates his vehicle idles over 2000rpms when he starts it. Customer claims that this occurs while the vehicle is at a full stop.
3159	COROLLA	2009	12/15/2009	Customer called regarding 2009 Toyota Corolla. Specifically, customer claims that she was in an accident on December 22, 2009 when she was approaching a stop sign and depressed the brake. Customer claims that although she attempted to stop the vehicle, the vehicle accelerated and hit the vehicle in front of her. Customer further claims that in February, she began to notice that the vehicle will accelerate a little bit when she depresses the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3160	CAMRY	2009	12/15/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date as he was changing lanes, he felt the vehicle lose control and therefore he pressed on the brakes, pulled over, and pulled the key out. Customer further claims that he was going 40 MPH at the time and that the vehicle engine was revving very high. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3161	AVALON	2006	12/15/2009	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on December 14, 2006, while his wife was driving, the vehicle accelerated on its own in a parking lot, over a curb, causing it to hit a fence. Customer claims that he was unsure if his wife was pressing on the brakes at the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3162	CAMRY	2008	12/15/2009	Customer called regarding his 2008 Toyota Camry CE. Specifically, customer claims that on December 12, 2009, the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3163	CAMRY	2005	12/15/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that he had his accelerator pedal repaired on September 19, 2009, and he seeks to know whether the cost of his repair is covered under the recall.
3164	CAMRY	2002	12/15/2009	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on December 12, 2009 customer was pulling out of parking lot and when she raised foot off the gas pedal the vehicle accelerated, but she was able to gain control by stepping on brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3165	RX 450h	2010	12/15/2009	Customer called regarding her 2010 Lexus RX 450h. Specifically, customer claims that on an unknown date the vehicle started to accelerate when she was on the turnpike and was able to stop the vehicle only by turning it off. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3166	HIGHLANDER	2005	12/15/2009	Customer called regarding his 2005 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle's acceleration pedal stayed down and the vehicle kept going while he had both feet on the brake pedal.
3167	MATRIX	2005	12/15/2009	Customer called regarding her 2005 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates the vehicle stalled and accelerated on its own when coming to a stop.
3168	AVALON	2005	12/15/2009	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle had a sudden surge of acceleration when she applied the brakes to avoid hitting a vehicle that had suddenly stopped in front of her. Customer further claims that the vehicle stopped after she ran into a trash can. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3169	HIGHLANDER	2005	12/15/2009	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on December 15, 2009 the vehicle accelerated into a post when she was turning into a parking space at about 5 mph. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3170	CAMRY	2005	12/15/2009	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on December 12, 2009, he was driving at less than 5 mph when he got into an accident.
3171	AVALON	2006	12/15/2009	Customer called regarding his 2006 Atoyota valon XLS. Specifically, customer claims that on December 6, 2009, his vehicle accelerated. Customer was advised to see a Field Technical Specialist.
3172	CAMRY	2010	12/15/2009	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that in October 2009 her father was pulling forward out of the garage when the vehicle suddenly accelerated, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3173	AVALON	2007	12/15/2009	Customer called regarding 2007 Toyota Avalon XLS. Specifically, customer claims that he was involved in two accidents. Customer claims that the first accident occurred in April, 2007 and the second accident occurred on October 12, 2007. Customer claims that she drove in to a wall. Customer is seeking repair and reimbursement for damages. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3174	CAMRY	2004	12/15/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that in 2005, his wife was driving the vehicle when the accelerator stuck, causing her to drive into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3175	ES350	2007	12/15/2009	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle jerked forward and accelerated for 3 or 4 seconds after her husband took his foot off of the accelerator but not off of the brake. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3176	CAMRY	2010	12/15/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims on November 15, 2009, that his wife was driving the vehicle into their garage when the vehicle began to go faster instead of slowing down. Customer claims that she then pressed on the brake and the gas pedal at the same time. Customer claims that the incident resulted in damage to their garage. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3177	RAV 4	2007	12/15/2009	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on November 2, 2009 the vehicle would not stop when she braked while approaching a stop light. Customer further claims that the vehicle surged into the vehicle in front of her. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3178	MR2 SPYDER	2002	12/15/2009	Customer called regarding his 2002 Toyota MR2 SPYDER. Specifically, customer claims that on unknown dates the throttle to her vehicle sticks.
3179	CAMRY	2005	12/15/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 14, 2009, she was parallel parking her vehicle when the engine revved wildly and she could not control the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3180	ES 330	2005	12/15/2009	Customer called regarding his 2005 Lexus ES 330. Customer claims that on an unknown date, his wife was backing out of a driveway when the vehicle lurched back and hit a parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3181	ES 350	2008	12/16/2009	Guest claims that the vehicle would not slow down in traffic on November 25, 2009. Guest further claimed that he applied all possible force on the brake pedal, but the car still did not slow down and in fact appeared to be accelerating. Guest reported that his brake pedal was no longer in the vehicle. Electronic system health check was conducted, and it was verified that no floor mat was installed in the vehicle at the time of inspection. The vehicle was test driven and its proper operation was verified. No repairs were performed.
3182	CAMRY	2006	12/16/2009	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date, he was pulling into a parking space when the vehicle lunged forward over the curb and hit barriers in front of a store. Customer further claims that he experienced a sudden surge in the engine while he was parking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3183	CAMRY	2010	12/16/2009	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle accelerates more forcefully than he's pressing on the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
3184	4RUNNER	2005	12/16/2009	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates the accelerator kept going and almost caused an accident. Customer further claims that the vehicle was making noise.
3185	PRIUS	2005	12/16/2009	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3186	ES 330	2005	12/16/2009	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on 3 unknown dates the vehicle accelerated unintentionally. Customer further claims that, one time, he was driving on the freeway and had to drive off the median in between two trees to avoid an accident. Customer further claims that it seems as though the cruise control kicks in.
3187	CAMRY	2005	12/16/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 16, 2009, she had her seventh occurrence of unintentional acceleration in her vehicle. Customer further claims that as a result of the acceleration, she ran into a sign and bushes.
3188	PRIUS	2007	12/16/2009	Customer called regarding his 2007 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle occasionally surged for a few moments while moving at highway speeds.
3189	CAMRY	2005	12/16/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 16, 2009, she had her seventh occurrence of unintentional acceleration in her vehicle. Customer further claims that as a result of the acceleration, she ran into a sign and bushes.
3190	RAV 4	2008	12/16/2009	Customer called regarding his 2008 Toyota Rav4. Specifically, customer claims that when he attempts to park the vehicle, the engine revs up even though he is pressing on the brake. Customer further claims that this has happened three (3) times, with the first instance occurring in September 2009 and the second incident occurring before Thanksgiving 2009. Customer claims that he has taken the floor mats out of his vehicle. Customer claims that unintended acceleration occurs while the vehicle is already in motion.
3191	SIENNA	2006	12/16/2009	Customer wrote regarding his 2006 Toyota Sienna. Specifically, customer claims that his vehicle "takes off." Customer further claims that he can control the vehicle after trying the brakes a couple of times.
3192	LS 460	2007	12/16/2009	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on two unknown dates he was at a stop when the vehicle suddenly accelerated forward and he used full force to make vehicle stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3193	TACOMA	2008	12/16/2009	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, the most recent occurrence of which was on 12/12/2009. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle was already in motion when the sudden acceleration occurred and the engine revved.
3194	CAMRY	2002	12/16/2009	Customer called regarding her 2002 Toyota Camry LE. Customer claims that on unknown dates, she had concerns with unintended acceleration.
3195	CAMRY	2009	12/16/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving, his vehicle accelerated to 70mph on its own. Customer further claims that after braking and putting the vehicle in neutral, it slowed down eventually. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3196	CAMRY	2009	12/16/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she has experienced two instances of sudden acceleration in her vehicle; in the most recent instance, she drove into her garage wall. Customer further claims that she is continuing to drive the vehicle against her better judgment.
3197	TACOMA	2006	12/16/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that on an unknown date the vehicle's engine revved up to 60 mph and took off when his wife was passing a garbage truck. Customer further claims that the brake pedal would not move down and the vehicle just stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3198	CAMRY	2005	12/16/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has had five different incidents of unintentional acceleration. Customer further claims that in the most recent incident, she had her foot off the gas pedal and was beginning to press the brake pedal when the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3199	Avalon	2006	12/16/2009	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on an unknown date, his vehicle accelerated on its own, causing an accident.
3200	CAMRY	2007	12/16/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on December 16, 2009, she was driving her car in reverse when the vehicle suddenly accelerated and jumped up onto the curb. Customer further claims that the same thing happened to her two years ago. Customer states that her fender was damaged in the incident.
3201	Camry	2007	12/17/2009	An FTR from the U.S., issued on December 17, 2009, concerning a 2007 Toyota Camry, states that a customer complained that the gas pedal sticks at times. The vehicle was road tested and the problem was reproduced. The probable cause was mechanical sticking of the gas pedal. The customer declined repair.
3202	TACOMA	2006	12/17/2009	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was at a complete stop.
3203	CAMRY	2009	12/17/2009	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates the vehicle lurches forward. Customer claims that the sudden acceleration has occurred both while the vehicle was at a full stop and already in motion.
3204	ES350	2009	12/17/2009	Customer called regarding his 2009 Lexus ES 350. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own and went through a garage and into a home.
3205	ES350	2007	12/17/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle experienced acceleration issues.
3206	RAV 4	2006	12/17/2009	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle did not accelerate when he stepped on the gas, and then the vehicle accelerated on its own when he released the gas pedal.
3207	CAMRY	2010	12/17/2009	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer claims that on multiple unknown dates the vehicle lurches forward when the brake is applied. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3208	CAMRY SOLARA	2007	12/18/2009	Customer called regarding 2007 Toyota Camry Solara. Specifically, customer claims that he was almost involved in a deadly accident when another person who was driving a Toyota Sequoia seemed not to be able to stop the vehicle. Customer claims that seven (7) people died in the accident.
3209	COROLLA	2010	12/18/2009	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on October 31, 2009, he was backing up to park when the vehicle suddenly accelerated and hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3210	CAMRY	2003	12/18/2009	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claimed that on unknown dates her vehicle lurched forward when she applied her foot to the accelerator.
3211	TACOMA	2007	12/18/2009	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle's accelerator revved up and the vehicle accelerated when he hit the brakes while pulling into a parking spot, causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3212	COROLLA	2006	12/18/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on December 17, 2009, she was approaching an intersection and applied the brakes but the vehicle would not slow down. Customer further claims that when she pushed the brake pedal harder, the vehicle accelerated and hit a truck. Customer further claims that in August 2008 she was at a stop sign when the vehicle accelerated, causing her to go through the intersection and hit another vehicle. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
3213	4RUNNER	2004	12/18/2009	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on unknown dates, the accelerator pedal stuck while driving on a highway. Customer further claims that on one occasion, the pedal stuck at over 90 mph.
3214	TACOMA	2009	12/18/2009	Customer called regarding his daughter's 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date, but likely in November of 2009, his daughter's vehicle accelerated as she applied the brakes, causing her to hit a cement pillar in a parking garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3215	ES350	2008	12/18/2009	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, while his daughter was driving during heavy traffic the vehicle suddenly accelerated and hit car in front of her. Customer claims that his daughter attempted to stop. Customer claims that the sudden acceleration occurred while the vehicle was in stop and go traffic.
3216	CAMRY SOLARA	2008	12/18/2009	Customer called regarding her 2008 Toyota Camry Solara. Specifically, customer claims that on two unknown dates, but some time in November or December of 2009, her vehicle bumped into another vehicle from a dead stop, causing several thousands of dollars of repairs each time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop with her foot on the brake.
3217	FJ CRUISER	2010	12/18/2009	Customer called regarding his 2010 Toyota FJ Cruiser. Specifically, customer claims that on unknown dates the vehicle acted like it had a sticking accelerator.
3218	GS 300	1998	12/18/2009	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on numerous unknown dates the accelerator became stuck.
3219	CAMRY	2009	12/18/2009	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she thinks her vehicle experienced an unintended acceleration.
3220	COROLLA	2007	12/18/2009	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on November 28, 2009, the vehicle's co-owner was in a parking space when she heard a roar and the vehicle went forward. Customer further claims that the vehicle went over the curb and hit a building. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3221	YARIS	2009	12/18/2009	Customer called regarding her 2009 Toyota Yaris 5 Door Std. Specifically, customer claims that on an unknown date her vehicle accelerated on its own, resulting in her receiving a speeding ticket. Customer further claims that on December 16, 2009 the vehicle began accelerating on its again. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3222	CAMRY	2009	12/18/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on either 12/14/09 or 12/15/09, he was driving on a highway onramp at about 45 mph when suddenly the vehicle accelerated on its own. Customer further claims that he put the vehicle in neutral and attempted to keep the wheel straight, but eventually struck a side road barrier, which caused the vehicle to spin around and strike the barrier again. Customer does not remember whether he applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3223	AVALON	2007	12/19/2009	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle intermittently lunged forward when he went to brake in the street, and that sometimes he hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3224	ES350	2007	12/19/2009	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, his vehicle experienced the unintended acceleration. Customer claims that the acceleration was caused by the electronic control of the vehicle.
3225	LS 400	1998	12/21/2009	Customer called regarding her 1998 Lexus LS 400. Specifically, customer claims that on an unknown date in 2003 she was in the parking lot of a dental office when she believes the vehicle accelerated on its own.
3226	COROLLA	2005	12/21/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on an unknown date in 2007, customer's wife was backing up when the vehicle accelerated, causing her to lose control and hit a truck and a trailer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3227	COROLLA	2009	12/21/2009	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on December 18, 2009, she tapped the accelerator to move her vehicle and the vehicle shot forward and ran into a fence. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3228	CAMRY	2002	12/21/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on December 16, 2009 vehicle exhibited unintended acceleration while at a stop sign, causing it to strike another car. Customer further claims that her foot was on the brake pedal at the time of the accident. An FTS inspected the vehicle.
3229	CAMRY	2007	12/21/2009	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on September 26, 2007 the vehicle accelerated into another vehicle when her daughter released her foot from the brake while stopped at a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3230	HIGHLANDER	2007	12/21/2009	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claimed that on December 17, 2009, his wife slowed down to make a right turn but their car accelerated and hit a pole. Customer further claimed that his wife applied the brakes but the car continued to accelerate. Customer claimed that the sudden acceleration occurred while the vehicle was already in motion.
3231	CAMRY	2010	12/21/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that on December 19, 2009, her mother was driving the vehicle and was pulling into the garage. Customer further claims that her mother took her foot off the brake but that the vehicle spontaneously accelerated, crashing into the wall inside of the garage. Customer states that her mother attempted to brake the vehicle, but that the vehicle did not respond to braking until after impact. A Field Technical Specialist (FTS) inspected the vehicle on January 12, 2010. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3232	IS250	2007	12/21/2009	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, while driving on the highway, he was involved in a multiple car accident. Customer claims that he was behind another and it caused him to hit the vehicle in front of him, etc. Customer claims that the two drivers in front of him are claiming that his vehicle accelerated and that he was hit from behind after his vehicle had accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3233	IS250	2008	12/21/2009	Customer called regarding 2008 Lexus IS 250. Specifically, customer claims that on the Friday prior to 12/21/09, while moving her vehicle into her driveway, the vehicle accelerated unintentionally. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3234	4RUNNER	2008	12/21/2009	Customer called regarding her 2008 Toyota 4Runner. Specifically, customer claims that on an unknown date she was driving when she realized that the accelerator was stuck under the floor mat.
3235	COROLLA	2008	12/21/2009	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on December 21, 2009 the vehicle lunged forward and ran into a garbage bin while she was pulling into a parking lot. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3236	TACOMA	2008	12/21/2009	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on December 12, 2009 the vehicle's engine revved when he started up the vehicle. Customer further claims that on an unknown date the vehicle suddenly accelerated after speeding up from a slow drive on a gravel road. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3237	COROLLA	2006	12/21/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date she was coming to a stop and tapped on the accelerator, and the accelerator pedal got stuck. Customer further claims that she slammed on the brakes and the vehicle went flying.
3238	PRIUS	2010	12/21/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerates. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurs when the vehicle is already in motion.
3239	RX 330	2004	12/21/2009	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on an unknown date he had an unattended acceleration.
3240	CAMRY	2010	12/21/2009	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that in November 2009 the vehicle continued to drive at the same speed after she removed her foot from the accelerator.

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3241	TACOMA	2006	12/21/2009	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that he was involved in an accident while driving the vehicle. Customer further claims that when he was coming to a stop, the vehicle suddenly surged forward, causing him to rear end the vehicle in front of him. Customer claims that sudden acceleration occurred while vehicle was already in motion.
3242	CAMRY	2002	12/21/2009	Customer's boyfriend called on her behalf regarding her 2002 Toyota Camry LE. Specifically, customer's boyfriend claims that on December 18, 2009 her accelerator jumped into max speed and the vehicle failed to slow when brake applied. Customer claims this sudden acceleration occurred while the vehicle was already in motion.
3243	LX 570	2009	12/21/2009	Customer called regarding her 2009 Lexus LX 570 (V8) 4x4. Specifically, customer claims that on an unknown date her vehicle accelerated on its own. Customer further claims that she used the emergency brake and neutral to stop the vehicle.
3244	IS 300	2004	12/22/2009	Customer called regarding her 2004 Lexus IS 300. Specifically, customer claims that on an unknown date the pedal went down on its own and the vehicle accelerated up to 90 mph on the highway. Customer further claims that she was able to stop but was very close to smashing her vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3245	COROLLA	2006	12/22/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on December 22, 2009, her vehicle accelerated suddenly.
3246	CAMRY	2010	12/22/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that her vehicle has accelerated roughly six (6) times. Customer further claims that she has lost control of the vehicle and could not stop the vehicle.
3247	CAMRY	2004	12/22/2009	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date, his wife was driving at 25 mph and could not stop the vehicle when she approached a stop signal.
3248	CAMRY	2003	12/22/2009	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on December 18, 2009, her vehicle accelerated spontaneously as she was backing into her daughter's driveway, causing her to hit a brick wall. Customer further claims that the vehicle stopped only after hitting the wall. Customer claims that the acceleration occurred while the vehicle was already in motion.
3249	CAMRY	2003	12/22/2009	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on December 18, 2009, the vehicle accelerated as she put her foot on the brake while in reverse. Customer further claims that she put both feet on the brakes but the vehicle accelerated faster and only stopped after hitting a brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3250	COROLLA	2006	12/22/2009	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates, the vehicle accelerated when her foot was not on the accelerator and she was coming to a stop sign. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3251	CAMRY	2010	12/22/2009	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle experiences jerking when accelerating between 0-45 mph. Customer further claims the vehicle experiences unintended braking when taking her foot off the accelerator. Both issues are sometimes subtle, sometimes more pronounced. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3252	CAMRY	2004	12/22/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on December 21, 2009, she was stopped at a light when her vehicle accelerated on its own and hit another vehicle. Customer further claims that she had her foot on the brake at the time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3253	CAMRY	2009	12/22/2009	Customer called regarding his 2009 Toyota Camry SE. Specifically, customer claims that on 12/19/2009 he hit the brake at a red light when the engine suddenly revved to 7000 rpm. Customer turned off the engine. Customer further claims the sudden surge happened one more time on an unknown date. Customer checked the floor mat but it was still secured to the floor. Customer was not clear if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3254	CAMRY	2002	12/22/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on October 31, 2009, her son was driving the vehicle when it accelerated suddenly as he was pulling into the driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3255	TACOMA	2005	12/22/2009	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on December 22, 2009 the vehicle had unintended acceleration when he took his foot off of the brake while at a stop sign. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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3256	PRIUS	2007	12/22/2009	Customer called regarding his 2007 Toyota Prius Touring Hybrid. Specifically, customer claims that on unknown dates, but on at least a dozen occasions, after taking foot off the accelerator and while braking, the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3257	CAMRY	2002	12/22/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date he was pulling into his driveway when the vehicle accelerated and hit either his house or a snowbank in front of his house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3258	CAMRY	2002	12/23/2009	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on December 23, 2009, his vehicle zoomed across the street as he put his foot on the gas after he started his vehicle. Customer further claims that his brakes would not stop the vehicle and that the vehicle hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3259	ES350	2010	12/23/2009	Customer called regarding his 2010 Lexus ES 350. Specifically, customer claims that on unknown dates, the vehicle accelerated unintentionally. On one occasion, while parking the vehicle, it accelerated and went up an embankment. Customer further claims that when he put the vehicle into reverse, the vehicle sped backwards down an embankment. On another occasion, customer claims that he felt it accelerate when pulling into a gas station. And on another occasion, customer claims the vehicle accelerated into a garage door.
3260	CAMRY	2002	12/23/2009	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on December 18, 2009, her vehicle accelerated as she was parking it on a side road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3261	CAMRY	2002	12/23/2009	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that in 2006 she was pulling into parking space at 1-2 mph when the vehicle accelerated, causing it to strike several cars, despite her foot being on the brake pedal. Customer further claims that on December 22, 2009, she was pulling into a parking space when the vehicle rapidly accelerated, causing it to jump two barriers. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3262	4RUNNER	2008	12/23/2009	Customer emailed regarding her 2008 Toyota 4Runner. Specifically, customer claims that on November 25, 2009, she went to pass another vehicle when the throttle went to the floor and the vehicle accelerated to 80-100 mph. Customer further claims that the floor mat was not under the accelerator pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3263	PRIUS	2010	12/23/2009	Customer called in regarding his 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated which caused an accident on 11.20.2009. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle suddenly accelerated while already in motion.
3264	TUNDRA	2010	12/23/2009	Customer called regarding his 2010 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle started to accelerate as he was coming to a stop. Customer further claims that his wife pressed on the brakes while driving at 25 mph downhill and the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3265	CAMRY	2005	12/23/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on June 15, 2009, she was pulling into a parking spot and went to apply the brakes, but the vehicle would not stop. Customer further claims that she noticed that the carpet floor mat was caught in the brake and accelerator.
3266	CAMRY	2009	12/23/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 12/21/09, he was parking his vehicle when it accelerated, causing him to drive onto the pavement and run into a store. Customer further claims that vehicle contained no mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3267	IS250	2009	12/23/2009	Customer called regarding her 2009 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle accelerated when she was pulling into a parking space with her foot on the brakes. Customer further claims that the vehicle went flying over a curb into a grassy median and then into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3268	CAMRY	2009	12/23/2009	Customer called regarding his 2009 Toyota Camry SE. Specifically, customer claims that on 12/19/2009 he hit the brake at a red light when the engine suddenly revved to 7000 rpm. Customer turned off the engine. Customer further claims the sudden surge happened one more time on an unknown date. Customer checked the floor mat but it was still secured to the floor. Customer was not clear if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3269	COROLLA	2005	12/23/2009	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that in September 2008, he was backing up when the brakes did not work, and when he put the vehicle in drive it continued to go backwards. Customer further claims that on December 22, 2009, his wife was driving, and the vehicle would not brake when in reverse and she had to turn the vehicle off to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3270	AVALON	2007	12/23/2009	Customer emailed regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle would not stop when he hit the brakes, causing him to run into the vehicle in front of him. Customer further claims that on unknown dates the vehicle lurched and the RPM went up past 3000 when starting up the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3271	SIENNA	2004	12/23/2009	Customer called regarding his 2004 Toyota Sienna. Specifically, customer claims that on December 17, 2009, he accelerated out of a stop light, after which his vehicle would not stop. Customer further claims that the vehicle jumped a curb. customer states that he stepped on the brake to avoid hitting pedestrians, and that his vehicle then hit a pole and trees. Customer claims that unintended acceleration occurred while the vehicle is already in motion.
3272	CAMRY	2005	12/23/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has had two accidents relating to the accelerator--the first on November 20, 2009, and the second on December 19, 2009.
3273	CAMRY	2005	12/23/2009	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that she has had two accidents relating to the accelerator--the first on November 20, 2009, and the second on December 19, 2009.
3274	CAMRY	2007	12/23/2009	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his wife was driving the vehicle in the snow and felt the vehicle accelerate while she was pressing on the brake. Customer further claims that this happened one other time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3275	TACOMA	2010	12/24/2009	Customer called regarding his 2010 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle took off on its own. Customer further claims that there was no accident but that he wanted to document his concern.
3276	CAMRY	2010	12/24/2009	Customer called regarding 2010 Toyota Camry. Specifically, customer claims that he may have experienced one instance of unintended acceleration. The details of the underlying incident are unknown.
3277	CAMRY	2003	12/28/2009	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on December 25, 2009, his mother was pulling into a driveway at 10 mph when the vehicle accelerated by itself, causing it to strike a home. Customer further claims that his mother had both feet on the brakes and the vehicle did not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3278	TUNDRA	2004	12/28/2009	Customer called regarding his 2004 Toyota Tundra. Specifically, customer claims that on December 24, 2009, he was backing up in a parking lot and although he took his foot off the accelerator, the vehicle accelerated. Customer further claims that the vehicle collided into a parked vehicle behind him. Customer claims that the vehicle surged backwards. Customer claims that the vehicle would not stop despite application of the brakes. Customer claims that the sudden acceleration occurred whiel the vehicle was already in motion.
3279	CAMRY	2009	12/28/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle accelerated unintentionally and he removed the car floor mats after the incident. Previous case number: 0911133256
3280	CAMRY	2004	12/28/2009	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that about six months ago, when she went to turn on the motor, the vehicle accelerated but she was able to put it into gear.

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3281	TACOMA	2009	12/28/2009	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on November 24, 2009 the vehicle went to full throttle while he was backing out of the garage, which caused him to run into his neighbor's car. Customer further claims that he then put the vehicle in drive, and it shot across and hit his garage. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3282	4RUNNER	2007	12/28/2009	Customer called regarding her 2007 Toyota 4Runner. Specifically, customer claims that on December 23, 2009, she was trying to change lanes on the freeway when the vehicle suddenly accelerated to 90 mph. Customer further claims that the brake did not slow the vehicle, and that she had to shift the vehicle into neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3283	PRIUS	2010	12/28/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but 15 times since the purchase of the vehicle, while in D mode and not B mode, and while braking, the vehicle lunged forward for a short period while going downhill and after he hit a pothole. Customer further claims that acceleration stopped if he pushed the brakes harder. An FTS failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3284	RX 350	2010	12/28/2009	Customer called regarding her 2010 Lexus RX 350. Specifically, customer claims that on December 27, 2009, her husband was driving the vehicle from the garage in reverse when the vehicle jumped and shot out on its own across the road before it hit a fence and a patio wall. Customer further claims that her husband then put the vehicle in drive at which point the vehicle took off and hit his parked vehicle across the street.
3285	IS350	2008	12/28/2009	Customer called regarding his 2008 Lexus IS 350. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and took off and surged forward even more when he pressed on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3286	TACOMA	2004	12/28/2009	Customer called regarding 2004 Toyota Tacoma. Specifically, customer claims that the throttle of the vehicle became stuck, causing him to drive into his house.
3287	COROLLA	2010	12/28/2009	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date in September or October 2009, customer's wife was pulling into the garage when the vehicle lurched forward and hit the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3288	CAMRY	2007	12/28/2009	Customer's wife called regarding customer's 2007 Toyota Camry. Specifically, customer claims that on December 28, 2009, he was at a red light with his foot on the brake when the vehicle revved and the RPMs went up to 8. Customer further claims that the floor mats were removed from the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3289	RAV 4	2010	12/29/2009	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 12/2009. FTS did not inspect the vehicle. The customer further claims the vehicle was already in motion when the sudden acceleration occurred.
3290	ES350	2010	12/29/2009	Customer called regarding his 2010 Lexus ES350. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own and he crashed through the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3291	AVALON	2008	12/29/2009	Customer called regarding her 2008 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, her vehicle accelerated up to 95 mph, she applied the brakes, but the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3292	PRIUS	2005	12/29/2009	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on an unknown date she was approaching a red light at 5 mph and attempted to apply the brakes, but the vehicle surged forward and accelerated on its own. Customer further claims that the vehicle came to a stop after hitting the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3293	PRIUS	2010	12/29/2009	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, she experienced the vehicle lurching forward while driving downhill or over a bump in the road or a pothole. Customer claims during such incidents, she felt a change in the smoothness of the ride. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3294	AVALON	2005	12/29/2009	Customer emailed regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle suddenly accelerated when she was driving it around 10 mph in a parking lot. Customer further claims that she could not stop the vehicle by applying the brakes, and that she was able to slow the vehicle down by putting it into neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3295	AVALON	2008	12/29/2009	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on that on an unknown date, his car suddenly surged forward 5-6 feet, he pressed the brake, but the vehicle did not stop. His car allegedly hit the rear bumper of the vehicle in front of him.
3296	PRIUS	2010	12/29/2009	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while driving at around 10-15 mph, when the vehicle hit a bump, the vehicle started to accelerate 2-4 mph while he had his foot on the brake and slowing down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3297	TACOMA	2005	12/30/2009	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on December 28, 2009 the vehicle accelerated and jumped forward and ran into his garage door as he was parking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3298	MATRIX	2006	12/30/2009	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on December 28, 2009 the vehicle accelerated when he was braking at 20 mph. Customer further claims that the brakes slowed but did not stop the vehicle, and that he was able to shift the vehicle into neutral before running into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3299	PRIUS	2010	12/30/2009	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 12/30/2009. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3300	CAMRY	2010	12/30/2009	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 12/30/09 he was parking in his garage when the vehicle surged forward; he hit the brakes hard and put the car in neutral, but the vehicle collided with the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3301	GS 300	1998	12/30/2009	Customer called regarding his 1998 Lexus GS 300. Specifically, customer claims that on an unknown date his accelerator kept getting stuck.
3302	VENZA	2009	12/30/2009	Customer called regarding 2009 Venza. Specifically, customer claims that vehicle's steering column makes noises. Customer further claims that when she put her vehicle in reverse, the vehicle will not ease back slowly, requiring her to push on the accelerator and causing the vehicle to jump back. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurs while the vehicle is already in motion.
3303	CAMRY	2009	12/30/2009	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that in December 2009, while attempting to make a U-turn, the engine accelerated; customer hit the brake and was able to re-control the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3304	RAV 4	2005	12/30/2009	Customer called regarding her 2005 Toyota RAV4. Customer claims that on December 24, 2009, she was backing out of a parking lot when the vehicle accelerated and crashed into a tree. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
3305	SIENNA	2008	12/30/2009	Customer called regarding his 2008 Toyota Sienna. Specifically, customer claims that on December 30, 2009, he was at a full stop with his brakes depressed. Customer claims that then, "out of nowhere," the vehicle surged and began to move across the street. Customer states that the vehicle kept moving despite the fact that he was depressing the brake. Customer states that this has happened three (3) other times. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
3306	RX 330	2004	12/30/2009	Customer called regarding her 2004 Lexus RX 330. Specifically, customer claims that on unknown dates vehicle twice exhibited unintended acceleration.
3307	CAMRY	2007	12/30/2009	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that her vehicle will intermittently accelerate from five to 10 miles per hour up to 40 miles per hour. Customer appears to believe that the fact that Toyota mailed incentive letters to its customers meant that Toyota would buy vehicles back.

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3308	CAMRY	2008	12/30/2009	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 12/25/2009 his son was driving the vehicle when it accelerated on its own and struck a concrete barrier. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3309	CAMRY	2007	12/30/2009	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that vehicle was in driveway and was being driven in reverse when the vehicle suddenly accelerated, knocking down door pillars. Customer claim that sudden acceleration occurred while the vehicle was already in motion.
3310	HIGHLANDER	2007	12/30/2009	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration.
3311	HIGHLANDER	2008	1/4/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on 1/00/10, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3312	ES350	2007	1/4/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle took off after she put it in drive while backing into a parking space. Customer further claims she hit the parked vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3313	TACOMA	2006	1/4/2010	Customer called regarding her 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on October 10, 2009 the vehicle was in an accident due to unintended acceleration. Customer further claims that she ran into a concrete median exiting the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3314	ES350	2009	1/4/2010	Customer called regarding her 2009 Lexus ES 350. Specifically, customer claims that on an unknown date, she experienced unintended acceleration.
3315	PRIUS	2006	1/4/2010	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into a ditch. FTS failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3316	CAMRY	2007	1/4/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims she was driving at 60 miles per hour when the vehicle began spontaneously accelerating while going up a bridge. Customer claims that when cruise control was turned off, the car stopped accelerating. Customer further claims that she has experienced two other instances of unintended acceleration.
3317	AVALON	2006	1/4/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that in December 2009 the vehicle accelerated and went over some hedges when he was pulling into a parking space. Customer further claims that the vehicle kept accelerating after he applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3318	CAMRY	2007	1/4/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has been experiencing unintended acceleration. Details regarding the underlying incident are unclear.
3319	CAMRY	2006	1/4/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on January 7, 2009, she was coasting into a parking space at 5 mph when the vehicle took off and she could not stop it, causing her to run into a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3320	PRIUS	2010	1/4/2010	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 11/16/2009. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3321	4RUNNER	2008	1/4/2010	Customer called regarding his 2008 Toyota 4Runner. Specifically, customer claims that on January 1, 2009, he was driving up a steep driveway and that his RPMs were at about 1500-2000 when going up the hill. Customer further claims that when he reached the top of the driveway, the vehicle accelerated and hit a tree about six (6) feet away. Customer also claims that the vehicle jumped over a bed of rocks. Customer claims that vehicle sustained front-end damage as a result of the incident. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3322	TACOMA	2006	1/4/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 1/2/2010 which caused an accident. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.

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3323	COROLLA	2005	1/4/2010	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on December 8, 2009 the vehicle accelerated when she pressed the brake while parking in her garage, causing her to crash into her laundry room. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3324	TACOMA	2009	1/4/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle accelerated on its own up to 9 mph when he started up the vehicle. Customer further claims that the vehicle will occasionally accelerate up his steep driveway without him putting his foot on the accelerator. Customer further claims that the problem is worse when the vehicle is cold. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3325	PRIUS	2010	1/4/2010	Customer called in regarding 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerates but failed to provide a specific date. FTS inspected the vehicle but was unable to duplicate the acceleration or recommend any repairs. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3326	CAMRY	2009	1/4/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 11/19/09, she was at a stop sign at a complete stop when the vehicle revved and lurched straight forward, causing her to hit the vehicle ahead of hers. Customer further claims that her foot was on the brake the entire time, and that the floor mat was hooked and was not stuck in the accelerator pedal. She states that the vehicle stopped when she applied more pressure to the brakes, and that the dealer has inspected her vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3327	RX 330	2004	1/4/2010	Customer called regarding his 2004 Lexus RX 330. Specifically, customer claims that on December 26, 2009, his vehicle surged and slammed into the vehicle in front of him as the vehicle was on an uphill grade. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3328	CAMRY	2008	1/4/2010	Customer called regarding his 2008 Toyota Camry. Customer does not claim any acceleration problems, but asks whether cruise control is related to acceleration issue.
3329	COROLLA	2006	1/4/2010	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated on its own.
3330	COROLLA	2009	1/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle surged at stop signs and stop lights. Customer further claims that the vehicle experienced unintended acceleration about 8 times.
3331	PRIUS	2008	1/5/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 1/00/10, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3332	CAMRY	2009	1/5/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 9/26/09, her daughter experienced a problem with unwanted acceleration--her daughter was parked and when she turned the vehicle on, the vehicle went forward even though she was in reverse. Customer further claims that in order to stop the vehicle, she turned it off, and that upon turning it on again it drove fine. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3333	LS 430	2003	1/5/2010	Customer called regarding her 2003 Lexus LS 430. Customer's mother was driving the vehicle, and on an unknown date, the vehicle took off as customer's mother was parking in a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3334	COROLLA	2006	1/5/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle intermittently wanted to shoot out when she stepped on the brakes. S76
3335	SCION TC	2005	1/5/2010	Customer called regarding his 2005 Scion TC. Specifically, customer claims that on December 4, 2009, vehicle exhibited unintended acceleration up to 60 mph, causing it to strike another vehicle and concrete barrier.
3336	TACOMA	2005	1/5/2010	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to specify a particular date. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3337	TACOMA	2007	1/6/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated in 2009. FTS did inspect the vehicle but could not replicate the acceleration and did not recommend any repairs. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.

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3338	CAMRY	2009	1/6/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle jumped when started. Customer further claims that it is not the floor mats. Customer was not clear if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3339	SCION XD	2008	1/6/2010	Customer called regarding a 2008 Scion XD. Customer's mother was driving the vehicle, and on December 30, 2009, the vehicle lurched forward as customer's mother was parking in a parking lot. Customer further claims that the vehicle was only stopped after it hit another vehicle and a concrete post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3340	TACOMA	2007	1/6/2010	Customer called regarding 2007 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle exhibits an abrupt "bumping sensation" when he comes to a stop. Customer further claims that when he lets off the brake, a similar "bumping" sensation occurs. Customer states that vehicle has a shifting issue. Customer claims that sudden acceleration occurs both when the vehicle is in motion and when the vehicle is at a full stop.
3341	PRIUS	2010	1/6/2010	Customer called regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, while braking, the vehicle surged and jerked forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3342	CAMRY	2007	1/6/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 12/22/2009 she was involved in an accident that she believes may have been caused by unintended acceleration. Customer decided not to have a Field Technical Specialist (FTS) inspect her vehicle.
3343	CAMRY	2009	1/6/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving her vehicle, she swerved to the right and the car then took off, accelerating on its own; she attempted to pump the brakes but the vehicle would not stop and she ran into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3344	COROLLA	2007	1/6/2010	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated on its own, and that the check engine light was on.
3345	TACOMA	2008	1/6/2010	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to specify a particular date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3346	TUNDRA	2003	1/7/2010	Customer called regarding his 2003 Toyota Tundra. Specifically, customer claims that on an unknown date, his vehicle surges forward as he attempts to take off from a light or stop sign. Customer further claims that the problem is more pronounced in cold weather. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3347	VENZA	2009	1/7/2010	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on unknown dates the vehicle took a while to accelerate when he pressed the pedal. Customer further claims that when he used cruise control on the freeway, the vehicle accelerated from 65 mph to 73 or 74 mph before going back to 70 mph.
3348	ES350	2007	1/7/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle surged forward on its own and hit a pole in a parking lot. An FTS inspected the vehicle.
3349	TACOMA	2006	1/7/2010	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on January 7, 2010 the vehicle started to accelerate when he stepped on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3350	4RUNNER	2004	1/7/2010	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on an unknown date while he had his foot on the brake, the vehicle lurched forward approximately one (1) foot, bumping the vehicle parked in front of him. Customer states that the problem happened again a few weeks later.
3351	COROLLA	2010	1/7/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the customer felt like the vehicle was trying to lunge forward while she was driving downhill with her foot off the accelerator and pressing on the brake pedal.
3352	CAMRY	2004	1/7/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date her mother was driving the vehicle when the vehicle exhibited unintended acceleration.
3353	CAMRY	2003	1/7/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle twice surged forward while decelerating.

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3354	TACOMA	2007	1/7/2010	Customer called regarding his 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration when he put it in reverse. Customer further claims that the vehicle backed up into his garage door, and that he had his foot on the brakes the entire time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3355	TACOMA	2005	1/7/2010	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on January 7, 2010 the vehicle lunged forward and accelerated by itself and ran into the vehicle in front of him while he was stopped at a red light with his foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3356	AVALON	2005	1/8/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on January 6, 2010 the vehicle abruptly accelerated forward when he was backing out of a parking space, causing him to run into a brick column. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3357	CAMRY	2003	1/8/2010	Customer called regarding a 2003 Toyota Camry. Customer called on behalf of his mother. Customer claims that the vehicle accelerated on its own on an unknown date as customer's mother backed out of the garage. Customer further claims that if his mother does not hold her foot on the brake, the vehicle will jump to 20 miles per hour. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3358	PRIUS	2009	1/8/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 1/00/10, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3359	CAMRY	2007	1/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on December 2, 2009, she was pulling in to a parking space trying to get closer to the curb when the vehicle accelerated on its own, jumped over the curb and crashed into a building. Customer further claims that she applied the brakes and the vehicle did not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3360	RX 330	2004	1/8/2010	Customer called regarding her 2004 Lexus RX 330. Specifically, customer claims that on an unknown date the vehicle accelerated and she could not stop it, resulting in an accident.
3361	CAMRY	2007	1/8/2010	Customer wrote a letter regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date customer was pulling into a parking space facing away from a store when the vehicle lurched ahead, went over an embankment and flipped upside down into a canal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3362	AVALON	2006	1/8/2010	Customer emailed regarding her 2006 Toyota Avalon XL. Specifically, customer claims that on an unknown date his wife had twice experienced unexpected acceleration when braking from 20 mph after the car started from cold. She struck a 2010 Lexus.
3363	TUNDRA	2006	1/8/2010	Customer called regarding his 2006 Toyota Tundra 4X4. Specifically, customer claims that twice, on unknown dates, the gas pedal had stuck but had not been involved in any collisions.
3364	CAMRY	2004	1/11/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on January 8, 2010, she was pulling the vehicle into a parking space when she experienced unintended acceleration. Customer states that the vehicle accelerated despite the fact that she did not press on the accelerator. Customer claims that the vehicle stopped after hitting another vehicle in front of her. Customer claims that her vehicle sustained front-end damage as a result of the incident. Customer claims that unintended acceleration occurred while the vehicle was already in motion.
3365	IS250	2008	1/11/2010	Customer called regarding her 2008 Lexus IS 250. Specifically, customer claims that on an unknown date, she swerved to avoid another accident and was unable to control the acceleration and got into an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3366	RAV 4	2010	1/11/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on December 25, 2009 the vehicle jolted when she pulled into a driveway, made a loud noise like a airplane engine, and slammed into the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3367	CAMRY	2008	1/11/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on January 11, 2010, the vehicle accelerated on its own. Customer further claims that the vehicle surged 3 seconds after accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3368	CAMRY	2006	1/11/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date the accelerator stuck while he was driving on the highway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3369	CAMRY	2009	1/11/2010	Customer called regarding her 2009 Toyota Camry LE V6. Specifically, customer claims that on 1/11/09 her husband was pulling into a parking space and began to apply the brake, when the vehicle surged forward and hit a wall. Customer further claims the floor mats had been removed prior to the incident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3370	PRIUS	2008	1/11/2010	Customer called regarding her 2008 Toyota Prius. Specifically, customer claims that on 11/5/09, the vehicle suddenly accelerated while driving and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3371	PRIUS	2010	1/11/2010	Customer called in regarding 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 12/24/2009 which caused an accident. FTS inspected the vehicle, but was the result of the inspection is unknown. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3372	CAMRY	2005	1/11/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 2, 2009, her vehicle had electrical issues just before he experienced unintended acceleration. Customer claims that that while pulling out of a carwash, the vehicle accelerate by itself into a block wall.
3373	AVALON	2007	1/11/2010	Customer called regarding his 2007 Toyota Avalon Limited. Specifically, customer claims that on two occasions since 2007, his vehicle experienced unintended acceleration.
3374	CAMRY	2008	1/11/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date he was driving when the vehicle kept going after he removed his foot from the accelerator pedal.
3375	CAMRY	2008	1/12/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates his vehicle idles at 600 rpms and the steering wheel shakes.
3376	TUNDRA	2000	1/12/2010	Customer called regarding his 2000 Toyota Tundra 4X4. Specifically, customer claims that on January 6, 2010 or January 7, 2010, his sister was driving the vehicle when the vehicle fish-tailed and they were unable to slow the car down, resulting in the car rolling over an embankment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3377	AVALON	2005	1/12/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while driving on the freeway, his vehicle accelerated to 95 mph. Customer claims that the first time he experienced this condition, the floor mats were in his vehicle, the second time the floor mats had been removed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3378	RAV 4	2008	1/12/2010	Customer's representative called regarding her 2008 Toyota RAV4. Customer's representative claims that when she approached a red light, the vehicle revved forward and the RPMs went up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3379	CAMRY	2007	1/12/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date he had pulled out of the garage and stopped with his foot on the brake so his wife could get in the vehicle. Customer's wife opened the door to get in when the vehicle took off on its own, causing the door to knock her to the ground. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3380	TUNDRA	2006	1/12/2010	Customer called regarding his 2006 Toyota Tundra 4X4. Specifically, customer claims that on unknown dates his accelerator pedal was sticking. Customer further claims that on January 9, 2010 he was rear-ended, which caused caused the accelerator pedal to stick and caused him to hit another vehicle and then two telephone poles.
3381	RX 350	2007	1/12/2010	Customer called regarding his 2007 Lexus RX 350. Specifically, customer claims that on an unknown date he was pulling into a parking spot when the engine accelerated to a very high rpm and the vehicle took off 5-10 feet and hit a retainer cable/wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3382	CAMRY	2007	1/12/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she hears a noise coming from the rear of the vehicle. Customer also claims that she hears a noise when she applies the brakes. Customer further claims that she has experienced instances of unintended acceleration even though her floor mat is removed.
3383	CAMRY	2008	1/12/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on three occasions, dates unknown, his vehicle experienced unintended acceleration.
3384	CAMRY	2003	1/12/2010	Customer called regarding his 2003 Toyota Camry LE. Specifically, on an unknown date, customer claims that he had trouble with his driving response.
3385	CAMRY	2005	1/12/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on December 20, 2009, while driving in reverse, the vehicle suddenly accelerated. Customer claims that while backing out of a parking space, her vehicle accelerated, she went around and around and she hit a concrete flower bed.
3386	TACOMA	2009	1/13/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on January 12, 2010 the vehicle crashed into his garage door. Customer further claims that on an unknown prior date the vehicle shot back 20 feet when he put it in reverse. Customer further claims that on an unknown prior date the vehicle felt as if it were pushing itself into the ditch when he turned around a corner at 10-15 mph in icy conditions. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3387	CAMRY	2009	1/13/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated on its own.
3388	CAMRY SOLARA	2005	1/13/2010	Customer called about his 2005 Toyota Camry Solara SE. Specifically, customer claims that on January 12, 2010, the car suddenly accelerated when backing up causing him to crash into a pole and hit the door of a vehicle. An FTS inspected the vehicle. Customer claims the sudden acceleration happened while the vehicle was already in motion.
3389	TUNDRA	2008	1/13/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on January 13, 2010 the vehicle accelerated up to 40 mph when he got out of his driveway and took his foot off the brake. Customer further claims that on the same date, when he was stopped at a stop light, he lightly pressed the accelerator and the vehicle accelerated up to 40 mph. Customer further claims that on unknown prior dates the vehicle experienced unintended acceleration of up to 70 mph, and took off by itself. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3390	CAMRY	2009	1/14/2010	Customer called regarding her 2009 Toyota Camry Hybrid. Specifically, customer claims that on 1/12/09 she was pulling into a parking space and had her foot lightly on the brake pedal when the vehicle accelerated about 10 feet over a grassy island surrounded by a cement curb. Customer further claims that the floor mats were removed prior to the incident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3391	PRIUS	2005	1/14/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3392	IS250	2008	1/14/2010	Customer called regarding his 2008 Lexus IS 250. Specifically, customer claims that on an unknown date, his daughter received a speeding ticket because of unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3393	TACOMA	2005	1/14/2010	Customer called regarding his 2005 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on unknown dates the vehicle's accelerator stuck, and the vehicle accelerated after he stepped on the brakes. Customer further claims that this has happened on four occasions.
3394	SIENNA	2005	1/14/2010	Customer called regarding his 2005 Toyota Sienna. Specifically, customer claims that on an unknown date he was driving the vehicle when it accelerated by itself from 40 to 70-75 mph.
3395	CAMRY	2007	1/14/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle would not stop as she was parking and she struck the side of a building.

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3396	CAMRY	2004	1/14/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on January 14, 2010, she made a left turn in the vehicle and applied the brakes but the vehicle would not stop. Customer further claims that the gas pedal became stuck and that she was not able to stop the vehicle before it hit a guard rail. Customer claims that the vehicle sustained damage as a result of the incident. Customer states that there was no driver's side floor mat in the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3397	CAMRY	2009	1/14/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she was going in reverse and backing out of a parking stall when suddenly the engine revved up and the RPM increased. Customer further claims that the engine accelerated, causing her to hit two other parked vehicles, even though she had her foot on the brake. At the time of the impact, the factory carpet floor mat was located on the driver's side. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3398	PRIUS	2010	1/14/2010	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when she was braking for a stop, the vehicle jumped forward. Customer claims it seemed like there was a bump in the road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3399	LS 430	2003	1/14/2010	Customer called regarding her 2003 Lexus LS 430. Specifically, customer claims that on an unknown date in 2007, her vehicle lurched forward and hit another vehicle. Customer further claims that her vehicle has jumped at times.
3400	COROLLA	2009	1/15/2010	Customer called regarding 2009 Toyota Corolla. Specifically, customer claims that the vehicle revs up to eight (8) RPMs even when the customer is not shifting.
3401	HIGHLANDER	2004	1/15/2010	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on an unknown date she was pulling into a parking space when the gas pedal became stuck under the floor mat, resulting in a collision.
3402	CAMRY	2002	1/15/2010	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on December 2008 her vehicle surged forward and caused an accident.
3403	PRIUS	2009	1/15/2010	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date, while pulling into a parking spot, the vehicle accelerated by itself, jumped the curb and hit a building, damaging the front of the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3404	RX 350	2008	1/15/2010	Customer called regarding his 2008 Lexus RX 350. Specifically, customer claims that on an unknown date his car accelerated roughly 20 mph as he was exiting the highway. Customer further claims that it was as though someone pushed on the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3405	PRIUS	2009	1/15/2010	Customer called regarding her 2009 Toyota Prius. Specifically, customer claims that on, unknown date(s), the vehicle suddenly accelerated while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3406	CAMRY	2005	1/15/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on a date unknown, while driving she began to accelerate. Customer claims that she was able to slow down, but her engine was revving.
3407	ES 300	2002	1/15/2010	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on an unknown date in January 2010 his vehicle accelerated while he was pulling out of the driveway, though his foot was on the brake. Customer further claims that his vehicle also accelerated while he was waiting at a stop light. An FTS inspected the vehicle.
3408	COROLLA	2009	1/15/2010	Customer called regarding 2009 Toyota Corolla. Specifically, customer claims that the vehicle was stopped at a red light. Customer further claims that he let go of the brake without stepping on the accelerator but the vehicle accelerated. Customer claims that he attempted to press on the brake but it failed, causing him to collide with the vehicle in front of him at five (5) miles per hour. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
3409	PRIUS	2006	1/15/2010	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3410	ES 300	2003	1/16/2010	Customer called regarding her 2003 Lexus ES 300. Specifically, customer claims that on unknown dates vehicle's accelerator becomes jammed.

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3411	CAMRY	2007	1/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 11, 2010, he was accelerating to approximately 55 or 65 miles per hour when the vehicle began to accelerate to 80 miles per hour. Customer further claims that the gas pedal appears to have gotten stuck under the carpet and not on the floor mat. Customer states that he put the vehicle in neutral twice to slow down the vehicle in order to pull over. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3412	PRIUS	2008	1/16/2010	Customer called in regarding a 2008 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to specify a particular date. It is unknown if FTS inspected the vehicle. The customer does not specify if the vehicle was in motion at the time of the claimed sudden acceleration.
3413	CAMRY	2003	1/19/2010	Customer called regarding her 2003 Toyota Camry XLE. Specifically, customer claims that on January 12, 2010, the vehicle suddenly accelerated as she was driving out of the parking lot. Customer further claims that she had her foot on the brake but the vehicle would not stop, which caused her to go over an embankment and hit a tree. Customer further claims that she tried to swerve the car but the steering wheel had locked. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3414	CAMRY	2005	1/19/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, her vehicle has been jerking.
3415	CAMRY	2006	1/19/2010	Customer's daughter-in-law called regarding customer's 2006 Toyota Camry. Specifically, customer claims that on January 10, 2009, she was coasting into a parking space with her foot off the brake when the vehicle went through a store window. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3416	ES350	2007	1/19/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on January 18, 2010 the vehicle took off like a rocket.
3417	AVALON	2006	1/19/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on January 17, 2010 the vehicle surged forward and ran into a truck when he was pulling into a parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3418	IS-F	2008	1/19/2010	Customer called regarding his 2008 Lexus IS-F. Specifically, customer claims that on January 18, 2010, he was pulling vehicle into driveway and could not stop it. Customer further claims that although the vehicle did not accelerate, he had no control of the brakes and the vehicle hit the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3419	CAMRY	2002	1/19/2010	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on January 18, 2010 she was backing up the vehicle and felt as though the vehicle wouldn't stop. Customer further claims that when she placed the vehicle in drive, it shot forward and hit the vehicle in front of her before bouncing back and hitting the vehicle again. Customer further claims that on unknown dates the vehicle would also not stop.
3420	CAMRY	2007	1/19/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 19, 2010, his wife experienced unexpected acceleration even though her foot was not on the gas pedal. Customer further claims that he had the correct floor mats in the vehicle.
3421	CAMRY	2005	1/19/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, while his wife was backing out of a parking lot, the vehicle accelerated. Customer claims that the vehicle accelerated about 30 feet and hit another vehicle. Customer claims that his wife's foot was on the brake.
3422	CAMRY	2007	1/19/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 15 or 16, 2010, he was approaching a stop light and when the vehicle in front moved forward, he took his foot off the brake and the vehicle surged forward and hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3423	COROLLA	2006	1/19/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while coming up to a light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3424	CAMRY	2004	1/19/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates she was having problems with sudden acceleration in her vehicle. Customer further claims that in January 2010 she was driving slowly when the vehicle suddenly accelerated twice.

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3425	CAMRY	2004	1/19/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on January 14, 2010, his wife was sitting in the driver's seat with her foot on the brake and customer was about to open the passenger door, when the vehicle took off at a high rate of speed. Customer further claims that the vehicle went off the road, over a curb, hit several other objects and then hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3426	CAMRY	2003	1/19/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claimed that on November 10, 2009 her husband was driving the vehicle when it suddenly accelerated and hit the school van in front. Customer further claims that on January 2, 2010 she was parallel parking the vehicle and the vehicle lurched forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3427	TACOMA	2006	1/20/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated which caused an accident, but failed to specify a particular date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3428	CAMRY	2007	1/20/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that when the vehicle is in reverse, it will jump with acceleration. Customer further claims that the accelerator pedal stuck on January 20, 2010.
3429	ES 330	2006	1/20/2010	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration while in motion, causing accidents on several occasions.
3430	RAV 4	2009	1/20/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 1/20/2010, which caused an accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion when the engine revved.
3431	CAMRY	2004	1/20/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on unknown date when the weather was cold and the engine was off all night, the vehicle revved and the RPMs ran high. Customer further claims that if he removes his foot from the brake, the vehicle surges forward.
3432	AVALON	2006	1/20/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that in October 2009 the vehicle took off into his garage when he applied the brakes while pulling up his driveway. Customer further claims that the vehicle continued to race after he put it in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3433	PRIUS	2010	1/20/2010	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurs while the vehicle is at a full stop and manifests as a high idle and revving of the engine.
3434	TACOMA	2009	1/20/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that in January 2010 the vehicle accelerated when he pressed the brakes while exiting a parking garage. Customer further claims that he later realized the acceleration was due to him depressing the accelerator at the same time as the brake pedal, and he recommended that the two pedals be moved farther apart.
3435	COROLLA	2010	1/21/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she backed into her garage, then shifted into drive to straighten up and the vehicle surged forward, damaging the garage and puncturing a tire on the bricks around the mailbox.
3436	AVALON	2006	1/21/2010	Customer's wife called regarding customer's 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle experienced issues with jumping and slowing down.
3437	TACOMA	2007	1/21/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion and that the engine revs or swings at idle.
3438	RAV 4	2009	1/21/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims that on an unspecified date, the vehicle sudden unintentionally accelerated. It is unknown if FTS inspected the vehicle. The customer further claims that the sudden acceleration occurs while the vehicle is already in motion.

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3439	SIENNA	2008	1/21/2010	Customer called regarding his 2008 Toyota Sienna. Specifically, customer claims that, on unknown dates, the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3440	RX 350	2010	1/21/2010	Customer called regarding her 2010 Lexus RX 350. Specifically, customer claims that on an unknown date she felt her vehicle accelerate without pressing on the gas pedal and resulted in her hitting a rock wall.
3441	PRIUS	2005	1/21/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that in December 2009 she was coming to a stop in a parking lot when the vehicle lurched forward and hit a pole even though she was applying the brakes. Customer further claims that her daughter has had the same thing happen while she was driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3442	CAMRY	2010	1/21/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that unknown dates the accelerator got stuck when he first started the vehicle, but after pressing the gas pedal a few times it worked normally.
3443	CAMRY	2004	1/21/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on December 18, 2009, his wife was driving the vehicle when the vehicle was involved in an accident. Customer further claims that he was behind another vehicle and tapped on the brakes when the vehicle accelerated instead of braking. Customer claims that his wife felt the gas pedal stick to the carpet in the vehicle. Customer claims that vehicle flipped over as a result of the incident.
3444	SC 430	2002	1/21/2010	Customer called regarding her 2002 Lexus SC 430. Specifically, customer claims that on unknown dates, her vehicle surged and took off on its own. Customer further claims that on January 20, 2010 the vehicle surged again and she almost killed someone. Customer further claims that on an unknown date she drove the vehicle through her garage.
3445	PRIUS	2005	1/21/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer wanted to be reimbursed for battery and throttle body service.
3446	TUNDRA	2007	1/21/2010	Customer called regarding her 2007 Toyota Tundra 4x4. Specifically, customer claims that on several unknown dates her vehicle lurched forward as she was driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3447	RAV 4	2007	1/21/2010	Customer called reagrding his 2007 Toyota RAV4. Specifically, customer claims that on 12/17/09 his wife was backing out of the driveway and the accelerator pedal stuck, causing the vehicle to drive into the trees.
3448	CAMRY	2008	1/21/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that her engine revs high when driving with cruise control on up an incline.
3449	CAMRY	2002	1/21/2010	Customer called regarding her 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle accelerated a couple feet while she was backing out of a parking spot at 2-5 MPH. Customer further claims that two weeks later her husband was driving the vehicle and had stopped at a light when the vehicle jerked rapidly and accelerated forward. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and already in motion.
3450	CAMRY	2007	1/21/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer wants to know whether Toyota has his or her correct mailing address to receive the recall notice.
3451	CAMRY	2003	1/21/2010	Customer called regarding his 2003 Toyota Camy LE. Customer called on behalf of his mother. Specifically, customer claims that on January 21, 2010, his mother was pulling into a parking spot when her vehicle accelerated and collided into a pillar. Customer further claims that his mother had an earlier accident on January 12, 2010 where the vehicle accelerated though she tried to apply the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3452	RAV 4	2007	1/21/2010	Customer called reagrding his 2007 Toyota RAV4. Specifically, customer claims that on 12/17/09 his wife was backing out of the driveway and the accelerator pedal stuck, causing the vehicle to drive into the trees.
3453	PRIUS	2010	1/21/2010	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when approaching a stop, vehicle surged right before the vehicle stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3454	RAV 4	2007	1/21/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she was driving on the freeway and the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3455	SCION tC	2009	1/21/2010	Customer called regarding her 2009 Scion tC. Specifically, customer claims that on three unknown dates her vehicle accelerated by itself when she came to a stop and she had to use the emergency break. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3456	CAMRY	2008	1/21/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date while driving with the vehicle on cruise control, the vehicle suddenly accelerated when he tapped the gas pedal. Customer further claims that the car accelerated from 60-70 mph, and that when he touched the pedal a couple of times, the car slowed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3457	CAMRY	2010	1/21/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on January 21, 2010, the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3458	HIGHLANDER	2006	1/21/2010	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on unknown dates he experienced the gas pedal sticking.
3459	CAMRY	2006	1/21/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date in 2006, she was turning into a parking lot when the vehicle accelerated by itself and hit a brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3460	CAMRY	2007	1/21/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle's gas pedal got stuck and then the vehicle lunged forward.
3461	CAMRY	2008	1/21/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates he experienced acceleration in his vehicle.
3462	CAMRY	2010	1/21/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates the vehicle jumps when accelerating. Customer further claims when his wife drove the vehicle, it accelerated when she took her foot off the brake, before putting it in drive. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
3463	CAMRY	2010	1/22/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on December 24, 2009 the vehicle had an unexplained surge and lunged forward about 50 feet before stopping when he was in his mother's driveway. Customer further claims that on December 31, 2009 the vehicle surged up to 50 mph when he pressed the accelerator at a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3464	AVALON	2007	1/22/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jumped while accelerating, and that the idle was very high when the vehicle started up cold.
3465	CAMRY	2006	1/22/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own and she skidded through a construction site.
3466	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle didn't respond and then took off when he pressed down on the pedal.
3467	COROLLA	2009	1/22/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date he was braking his vehicle at 55-60 mph, and the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3468	CAMRY	2007	1/22/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle spontaneously accelerated three or four times. Customer was unable to pinpoint specific dates of the alleged unintended acceleration.
3469	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she had problems with the brakes. Customer further claims that the vehicle went too fast while she was driving and when she tried to stop the vehicle it continued to drive. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3470	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her vehicle speed increased approximately 11 miles per hour when her foot was not touching the gas pedal. Customer further claims that cruise control was not engaged at the time. Customer claims that sudden acceleration occurred while the vehicle was already in motion.

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3471	MATRIX	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla/Matrix. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3472	TUNDRA	2006	1/22/2010	Customer called regarding his 2006 Toyota Tundra SR5 (V8). Customer's daughter was driving the vehicle. Specifically, customer claims that on July 29, 2008, his vehicle accelerated and daughter felt that accelerator was stuck. Customer further claims that the vehicle went up an embankment, through a fence, hit a ditch and flipped over.
3473	CAMRY	2010	1/22/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims on an unknown date that the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3474	CAMRY	2008	1/22/2010	Customer called regarding his 2008 Toyota Camry CE. Specifically, customer claims that on November 26, 2009, the vehicle surged ahead and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3475	AVALON	2006	1/22/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward three or four times while her foot was on the gas.
3476	AVALON	2007	1/22/2010	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, her vehicle accelerated while in a parked position.
3477	HIGHLANDER	2007	1/22/2010	Customer called regarding her 2007 Toyota Highlander Limited. Specifically, customer claims that on January 17, 2010, her vehicle did not brake properly causing her to t-bone another vehicle. Customer further claims that at the time of the accident she had her foot on the brake pedal. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3478	RAV 4	2009	1/22/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle's gas pedal got stuck 2-3 times. Customer further claims that on one occasion the vehicle lurched forward about 1 foot when he was going to put it in park.
3479	AVALON	2006	1/22/2010	Customer called regarding her 2006 Toyota Avalon Limited. The customer service representative advised the customer that the vehicle is supposed to continue to move forward if she is already accelerating, and removes her foot from the pedal. The customer service representative verified with customer that the vehicle stops when the brake is engaged.
3480	COROLLA	2007	1/22/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal had the condition as described in the ssc. Customer further claims that she heard a loud banging sound in the rear of the vehicle.
3481	Camry	2007	1/22/2010	Customer called regarding her Toyota. Specifically, customer claims that on unknown dates, the vehicle surged on its own.
3482	CAMRY SOLARA	2006	1/22/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on December 9, 2008, his wife backed out of a parking space and then pressed the gas pedal to go forward when the vehicle suddenly accelerated on its own, causing her to collide with four parked cars. Customer further claims that his wife applied the brakes but the vehicle did not stop.
3483	COROLLA	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle had issues with the accelerator pedal sticking and that she had to use excessive pressure to accelerate, which caused the vehicle to lunge forward.
3484	COROLLA	2009	1/22/2010	Customer called regarding his 2009 Toyota Corolla XLE. Specifically, customer claims that on an unknown date, she applied the brakes hard while stopping at a light and the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3485	CAMRY	2008	1/22/2010	Customer's wife called regarding his 2008 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date, the vehicle jolted and lunged forward while brake is pressed. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3486	Camry	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date, she was involved in an accident due to sudden acceleration. Customer further claims that floor mat interference caused the sudden acceleration.
3487	4RUNNER	2005	1/22/2010	Customer called regarding his 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates he experienced two acceleration events in the vehicle.
3488	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the car was already in motion.

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3489	AVALON	2010	1/22/2010	Customer called regarding her 2010 Toyota Avalon. Specifically, customer claims that she knows that four people were killed in an Avalon due to acceleration problems. Customer further claims that Toyota has been covering up the problem and knew about the problem when Toyota sold her the vehicle. Customer states that she is concerned for her safety. Customer does not appear to have personally experienced any instances of unintended acceleration.
3490	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jumped and the speed increased when driving at 25-30 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3491	RAV 4	2009	1/22/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle surged and the gas pedal seemed to stick when she applied the gas from a stopped position.
3492	CAMRY	2005	1/22/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that his accelerator pedal became stuck and the vehicle started speeding. Customer states that this issue did not happen again, but that he is concerned.
3493	COROLLA	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated on its own 1-2 times a week.
3494	COROLLA	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle revved.
3495	AVALON	2005	1/22/2010	Customer further claims that she experienced sudden acceleration in October of 2009 when she was pulling out of a parking lot. Customer claims that her floor mat was not in the vehicle. Customer claims that although she put her foot on the brake, the vehicle appeared to rev instead
3496	COROLLA	2009	1/22/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer states that on two occasions the vehicle would not stop despite pressing on the brake. Customer further claims that in one instance he hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3497	AVALON	2005	1/22/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while using the cruise control feature, the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3498	CAMRY	2004	1/22/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on September 14, 2004, his vehicle was totaled when he lost control of the vehicle. Customer further claims that he could not stop the vehicle while driving, causing the vehicle to hit a tree.
3499	CAMRY	2006	1/22/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates his gas pedal got stuck and he was almost in an accident.
3500	TACOMA	2010	1/22/2010	Customer called regarding his 2010 Toyota Tacoma. Specifically, customer claims that on January 21, 2010 the vehicle accelerated on its own and reached a speed of over 100 mph. Customer further claims that he was able to stop the vehicle by putting it into neutral. Customer also claims that he experienced unintended acceleration in his prior Toyota (model and year unknown). Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3501	RX 330	2004	1/22/2010	Customer called regarding her 2004 Lexus RX 330. Customer states that on an unknown day in June 2009, she was driving her vehicle when it suddenly accelerated and crashed into the vehicle in front of her. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
3502	Corolla	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates, her accelerator stuck but did not cause her to be in an accident. Customer further claims that she was able to press the brake and bring the car to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3503	MATRIX	2007	1/22/2010	Customer called regarding her 2007 Toyota Corolla Matrix STD. Specifically, customer's husband claims that on two unknown dates, the accelerator became stuck but did not cause an accident.
3504	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated without control while driving downhill. Customer further claims that the brakes were not functioning properly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3505	YARIS	2008	1/22/2010	Customer called regarding his 2008 Toyota Yaris. Specifically, customer claims that, on unknown dates, the gas pedal sticks and also the clutch does not feel sturdy as the gas pedal. Customer further claims he has to pump the clutch to shift gears. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3506	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 20, 2010 her husband was driving the vehicle when another car pulled in front of him. Her husband hit the brakes but the vehicle did not stop, and a frontal collision occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3507	TUNDRA	2010	1/22/2010	Customer called regarding 2010 Toyota Tundra 4X2. Specifically, customer claims that the vehicle sometimes lurches forward. Customer further claims that when accelerating from a stop, the vehicle hesitates before accelerating and then jumps.
3508	SC 430	2002	1/22/2010	Customer called regarding his 2002 Lexus SC 430. Specifically, customer claims that on an unknown date his partner was driving the vehicle when he started making a turn and the vehicle lurched forward and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3509	CAMRY	2008	1/22/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged and accelerated a couple of times. Customer further claims that the vehicle revved even when she stepped on the brakes and when she backed the vehicle out.
3510	RAV 4	2010	1/22/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle did not accelerate when she stepped on the gas pedal, then it jumped and sped off.
3511	CAMRY	2004	1/22/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that in August 2008 when she was driving her vehicle into the garage, the gas pedal became stuck, causing the vehicle to run into the wall of the garage.
3512	COROLLA	2007	1/22/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated drastically and did not stop.
3513	CAMRY	2005	1/22/2010	Customer called regarding 2005 Toyota Camry. Specifically, customer claims that on unknown dates, the pedal on her vehicle stuck and she was speeding.
3514	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates, when coming to a stop, the brakes don't initially responded, causing her to press them harder and the vehicle to lunge forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3515	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 21, 2010, her gas pedal "went really fast" and her vehicle collided with a pole. Customer further claims that she was pulling into a parking space when the vehicle suddenly accelerated, and that her foot was on the brake pedal when the sudden acceleration occurred. Customer claims that there was no driver's side floor mat in the vehicle at the time of the accident. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3516	RAV 4	2008	1/22/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3517	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle did not stop when she stepped on the brakes. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
3518	TUNDRA	2004	1/22/2010	Customer called regarding his 2004 Toyota Tundra. Specifically, customer claims that, on October 2008, the gas pedal stuck and caused an accident in a parking lot. Customer further claims his vehicle hit another vehicle as a result of the gas pedal sticking. Customer further claims the vehicle has a rattle while accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3519	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 19, 2010, the vehicle accelerated when she pressed the brakes while parking, and she had to use a great deal of force to slam on the brakes in order to avoid hitting a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3520	RAV 4	2006	1/22/2010	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, his wife was driving the vehicle, and it accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3521	RAV 4	2010	1/22/2010	Customer's daughter called regarding customer's 2010 Toyota RAV4. Specifically, customer's daughter claims that on January 21, 2010 the vehicle surged forward while stopped at a traffic light, causing customer's granddaughter to run into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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3522	RX 330	2005	1/22/2010	Customer called regarding her 2005 Lexus RX 330 (V6). Specifically, customer claims that on an unknown date the vehicle surged while customer was turning into a parking space, causing her to hit another vehicle. Customer claims that since that incident that the vehicle has surged when approaching a stop sign. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3523	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was in a terrible accident due to unintended acceleration. Customer further claims that the vehicle shifts gears on its own, and that on in date in question she was driving through a garage at approximately 10 miles per hour when she applied the brakes but the vehicle suddenly accelerated. Customer claims that after the accident occurred, the vehicle shifted into reverse on its own and continued to accelerate. Customer states that vehicle reached a speed of approximately 20 miles per hour.
3524	CAMRY	2009	1/22/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that her vehicle experiences extremely high revving when she drives up hills, and there is a high idle. Customer further states that she has to hit the pedal hard to drive up hills, and that when the vehicle is in idle it has an RPM higher than 2. She has contacted the dealer.
3525	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she has experienced multiple instances of unintended acceleration. Customer further claims that although she participated in the floor mat recall, she still experienced unintended acceleration. Customer states that her vehicle accelerated on its own when she was driving the vehicle, and that she had to stand on the brake to stop the vehicle. Customer also states that on occasion the vehicle will accelerate approximately 10 miles per hour after she releases the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3526	AVALON	2005	1/22/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on January 11, 2009, while driving 65 mph, he hit a concrete barricade. Customer claims that she was at a stop light and started to pull forward when the vehicle's speed increased, and as he press the bakes, they failed and he hit the barricade. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3527	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on 1/19/10 she was stopped in her driveway waiting for the garage door to open with her foot on the brake, when the vehicle suddenly surged forward and collided with the door. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
3528	VENZA	2009	1/22/2010	Customer called regarding 2009 Venza. Specifically, customer claims that the vehicle is revving up on its own. Customer further claims that at the end of November 2009, the vehicle tried to accelerate on its own while his foot was on the brake. Customer claims that vehicle was at a complete stop and that it then jumped forward, hitting another vehicle's bumper. Although customer states that he had floor mats in the vehicle at the time, he states that he did not notice any floor mat interference. Customer claims that sudden acceleration occurred while vehicle was at a full stop.
3529	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3530	CAMRY	2008	1/22/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle felt like it "was going too fast" when she started it.
3531	Camry	2006	1/22/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates, when she tried to slow her vehicle down, the vehicle sped up. Customer further claims that she had to step on the brakes 3-4 times before the vehicle would slow down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3532	CAMRY	2004	1/22/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on an unknown date her accelerator pedal became stuck shortly after purchase. Customer further claims that when going downhill, the vehicle did not decelerate and took some time to slow down.
3533	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Customer claims that on an unknown date the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3534	RAV 4	2009	1/22/2010	Customer called regarding his 2009 RAV4. Specifically, customer claims that on unknown dates, when pressing the accelerator, there was a delay in acceleration, and then the vehicle jumps and launched forward making a loud noise, and did not have smooth acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3535	MATRIX	2009	1/22/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on January 14, 2010, he was entering his garage and pressed the brake to slow down when the vehicle suddenly accelerated and hit a lawnmower, which hit the wall. Customer further claims that the vehicle did not stop until he jammed the brakes really hard. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3536	AVALON	2006	1/22/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jerked forward while driving and that he had concerns with the gas pedal. Customer further claims that the engine revved up on its own and then suddenly stopped.
3537	AVALON	2006	1/22/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jerked forward for a few seconds when on hills. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3538	RAV 4	2006	1/22/2010	Customer called regarding his 2006 Toyota RAV4. Specifically, customer claims that on an unknown date, his wife was driving the vehicle and it accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3539	TACOMA	2006	1/22/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on an unspecified date, which caused an accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
3540	COROLLA	2005	1/22/2010	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle jumped over a curb and went about 25 feet before she could stop it.
3541	AVALON	2007	1/22/2010	Customer called regarding her 2007 2007 Avalon XL. Specifically, customer claims that on an unknown date, she experienced unintended acceleration, customer claims that the vehicle keeps moving forward, but the brakes work. Customer called after seeing the ABC News report on the matter.
3542	GS 300	2006	1/22/2010	Customer called regarding his 2006 Lexus GS 300. Specifically, customer claims that on an unknown date vehicle exhibited unintended acceleration while trying to disengage cruise control. Customer further claims that he slowed the car by applying the brakes.
3543	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she had to avoid hitting another vehicle and hit a ditch.
3544	MATRIX	2007	1/22/2010	Customer called regarding his 2007 Toyota Corolla Matrix XR. Specifically, customer claims that on January 18, 2010, customer's father put the vehicle into drive and the vehicle suddenly accelerated and drove out of the parking lot, across two lanes of traffic, and into a fence.
3545	RAV 4	2009	1/22/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims that on an unspecified date, the vehicle sudden unintentionally accelerated. It is unknown if FTS inspected the vehicle. The customer further claims that the sudden acceleration occurs while the vehicle is already moving.
3546	Corolla	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, she experienced some sticking.
3547	TUNDRA	2006	1/22/2010	Customer called regarding her 2006 Toyota Tundra 4x4 Limited. Specifically, customer claims that on January 17, 2010 her vehicle accelerated out of control as she began to turn after a stoplight turned green, causing her vehicle to go over a curb and towards a brick wall. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3548	CAMRY	2009	1/22/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates on two different occasions, he has experienced problems with acceleration. Customer futher claims that some times it takes time to get the vehicle to accelerate.
3549	MATRIX	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle stalled then suddenly accelerated when driving on the highway. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3550	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date her vehicle suddenly accelerated. Customer further claims that the brakes squeaked.

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3551	CAMRY	2009	1/22/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle's gas lagged and the vehicle surged when accelerating.
3552	AVALON	2008	1/22/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on unknown dates when she put the vehicle in reverse the vehicle surged. Customer further claims that she had to have her foot on the brakes when she was about to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3553	CAMRY	2005	1/22/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, she was involved in an accident she thinks might be related to sudden acceleration. Customer claims that while pulling into a parking space, she stopped, and while attempting to straighten out, the vehicle accelerated forward. Customer claims that crashed into a store and broke a window.
3554	PRIUS	2004	1/22/2010	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3555	CAMRY	2007	1/22/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that there is a problem with the vehicle. Customer further claims that he or she is working with a Field Technical Specialist (FTS).
3556	CAMRY	2002	1/22/2010	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle twice exhibited unintended acceleration while in motion, which was solved by applying the brakes.
3557	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle sometimes lurched forward a little bit when it was at a stop light. Customer further claims that his wife does not want to drive the vehicle.
3558	UNKNOWN	UNKNO WN	1/22/2010	Customer called regarding her 2005 Toyota Sienna and 2010 Toyota Corolla. Specifically, customer claims that on unknown dates, her vehicles' gas pedals stuck.
3559	RAV 4	2009	1/22/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle's gas pedal got stuck while she was driving down the highway, and that she had to take her shoe off to get the gas pedal loose.
3560	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry. Customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3561	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that while he was driving his vehicle he noticed that the vehicle increased in speed by itself. Customer further claims that the problem only happened once. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3562	CAMRY	2009	1/22/2010	Customer called regarding her 2009 Toyota Camry Hybrid. Specifically, customer claims that on multiple unknown dates the car surges when the accelerator is pressed. Customer further claims that she removed the floor mats when instructed, but the vehicle continues to surge. Customer did not indicate whether the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3563	CAMRY	2005	1/22/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that in the summer of 2008, while pulling into a parking space, the vehicle took off and jumped over a curb and onto a sidewalk.
3564	COROLLA	2006	1/22/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on January 22, 2010, the vehicle went much faster when she did not put any pressure on the gas pedal.
3565	LS 460	2009	1/22/2010	Customer called regarding his 2009 Lexus LS 460. Customer's wife was driving at the time of the accident. Customer's wife claims that on an unknown date she was unable to stop the vehicle when brakes were depressed. Customer further claims that his wife was approaching an intersection when the vehicle failed to stop and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3566	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates when he pressed on the brake pedal at a stop sign the vehicle seemed to want to speed forward. Customer further claims that he had to slam the brakes to stop the vehicle from accelerating. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3567	COROLLA	2005	1/22/2010	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on January 22, 2010, the vehicle accelerated from 50 mph to 70 mph after he took his foot off of the gas pedal while he was driving on the freeway. Customer further claims that he was able to apply the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3568	CAMRY	2007	1/22/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 22, 2010, she was coming to a stop, and when the vehicle stopped it jumped. Customer further claims that on an unknown date the vehicle did a series of little jumps while driving on the highway. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
3569	TUNDRA	2005	1/22/2010	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that, on unknown dates, he was pulling a camper, and the accelerator got stuck and the vehicle took off to about 80 mph.. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3570	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle revved up.
3571	RAV 4	2007	1/22/2010	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date, he was driving at 25 mph, and the vehicle took off. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
3572	CAMRY	2005	1/22/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date in 2009, when she pressed the accelerator to back up, the vehicle accelerator by itself. Customer claims that she hit a water meter. Customer claims that she feels like when she presses the accelerator, there is a lot of play.
3573	COROLLA	2010	1/22/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on December 21, 2009, he applied the brakes but the behicle did not stop and he hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3574	ES350	2007	1/22/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates in 2007 the vehicle lurched forward unintentionally on three occasions.
3575	CAMRY	2009	1/22/2010	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on multiple unknown dates the vehicle has jumped when taking her foot off the brake. Customer further claims she has factory floor mats in the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
3576	AVALON	2006	1/22/2010	Customer called regarding his 2006 Toyota Avalon Touring. Specifically, customer claims that while his car has been trouble-free for three and a half years, the VVTI line ruptured in 2009 and since the repair, he has twice experienced sudden unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3577	RAV 4	2009	1/22/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle surged forward without her pressing the gas pedal. Customer further claims that this only happened when she drove at 65 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3578	CAMRY	2009	1/22/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle was revving up.
3579	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle backed into a bush, and she thinks it might have been caused by a sticking accelerator.
3580	GX 470	2004	1/22/2010	Customer called regarding her 2004 Lexus GX 470. Specifically, customer claims that on an unknown date in 2006, her accelerator was stuck which caused her to run into a truck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3581	RAV 4	2010	1/22/2010	Customer called regarding his 2010 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle had an acceleration issue and veered to the left when his wife applied the brakes.
3582	CAMRY	2004	1/22/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date he was involved in an acceleration incident in which he attempted to apply the brakes but the vehicle jumped forward. Customer states, however, that the road was icy and that this is why the vehicle did not stop.
3583	COROLLA	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on October 21, 2009, she she was parking her vehicle when it lunged forward and hit a cement wall. Customer further claims that her accelerator pedal was hard to depress and slow to return. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3584	CAMRY	2008	1/22/2010	Customer called regarding her 2008 Toyota Camry SE (V6). Specifically, customer claims that on an unknown date, the vehicle jumped backward while in reverse, even though her foot was on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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3585	COROLLA	2009	1/22/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle surged forward at a fast speed. Customer further claims the second time happened after she removed the floor mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3586	TUNDRA	2007	1/22/2010	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that in 2009, the vehicle lunged forward and hit a concrete barrier. Customer further claims that he pushed on the gas pedal and that the vehicle then accelerated more than it should have. Customer states that the floor mats are not touching the gas pedal.
3587	CAMRY	2008	1/22/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 1/22/2010, his vehicle accelerated twice.
3588	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced unintended acceleration even though his floor mats are secured. Customer further claims that he experiences unintended acceleration once or twice per month, and that when this happens the vehicle revs, accelerates approximately 10 miles per hour, and then comes back down.
3589	CAMRY	2007	1/22/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he is concerned for his family's life.
3590	CAMRY	2010	1/22/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle experiences intermittent jerking when driving on the highway at steady speeds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3591	COROLLA	2010	1/22/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle seemed to accelerate and lurch forward a little when she pressed on the brakes.
3592	SIENNA	2005	1/22/2010	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on February 6, 2009, she was parking her vehicle when the vehicle suddenly accelerated, causing her to hit three parked vehicles.
3593	CAMRY	2007	1/23/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in 2009, her vehicle rolled forward into another vehicle despite the fact that her vehicle was turned off and had been parked with the emergency brake on. Customer further claims that this was related to the accelerator pedal problem. Customer states that the driver's side floor mat has been removed from the vehicle.
3594	CAMRY	2002	1/23/2010	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on an unknown date the accelerator got stuck and his vehicle hit a building. Customer further claims that the vehicle did not stop when he applied the brakes. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3595	AVALON	2009	1/23/2010	Customer called regarding her 2009 Toyota Avalon. Specifically, on an unknown date the vehicle was in the driveway and she was standing behind it, and her husband put the vehicle in reverse and it jumped and accelerated backwards and knocked her over. Customer further claims that on another unknown date the vehicle flew backwards when she put it in reverse. Customer further claims that on an unknown date the vehicle took off on her when she was on the expressway. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
3596	RAV 4	2009	1/23/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims that on an unspecified date, the vehicle began to rev at high idle. It is unknown if FTS inspected the vehicle. The customer does not discuss if the issue occurs while already moving or completely stopped.
3597	COROLLA	2009	1/23/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date he was driving the vehicle and could not stop, causing him to hit a pole.
3598	RAV 4	2007	1/23/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date, the gas pedal stuck, and she had to slam on the brakes.
3599	COROLLA	2010	1/23/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal has gotten stuck twice. Customer further claims that in the first incident the vehicle picked up speed from 20 mph to 30 or 40 mph. Customer further claims that in the second incident the vehicle felt like it didn't want to stop when she was pulling into a gas station.
3600	PRIUS	2006	1/23/2010	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3601	COROLLA	2007	1/23/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on an unknown date her previous vehicle's gas pedal got stuck.

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3602	CAMRY	2010	1/23/2010	Customer called regarding his 2010 Toyota Camry. Customer claims that on an unknown date he was driving into his garage and the vehicle accelerated on its own, causing him to hit the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3603	COROLLA	2010	1/23/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 18, 2010, the brakes did not respond and the vehicle veered to the right, resulting in a collision.
3604	PRIUS	2009	1/23/2010	Customer called regarding his 2009 Toyota Prius. Specifically, the customer claims that on 1/20/2010, the vehicle unintentionally accelerated into a bush. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3605	RAV 4	2008	1/23/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3606	AVALON	2007	1/23/2010	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on an unknown date while driving on the highway, his vehicle began to unintentionally accelerate. Customer further claims that this has happened more than once and when it occurs it usually occurs for 2-3 seconds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3607	CAMRY	2007	1/23/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on October 29, 2009, she was driving the vehicle and that when she approached a turn and attempted to depress the brake, the vehicle would not stop. Customer further claims that the vehicle accelerated and hit the curb. Customer claim that the sudden acceleration occurred while the vehicle was already in motion.
3608	COROLLA	2010	1/23/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal sometimes got stuck and then the vehicle lurched forward when accelerating at low speeds. Customer further claims that this has happened 4-5 times.
3609	CAMRY	2010	1/23/2010	Customer called regarding her 2010 Toyota Camry. Customer claims that on unknown dates the vehicle accelerated on its own four times. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3610	AVALON	2008	1/23/2010	Customer called regarding her 2008 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, her accelerator pedal makes a clicking noise. Customer further claims that when she takes her foot off the pedal, the vehicle does not coast, but rather, it almost comes to a stop.
3611	AVALON	2005	1/23/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on December 13, 2009, while pulling into a parking space, the vehicle accelerated on its own and ran through the window of the restaurant. Customer claims that he believes he was pressing on the brake but is unsure. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3612	COROLLA	2010	1/23/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle had two incidents with the accelerator pedal. Customer further claims that in the first incident the vehicle jumped when she took her foot off the gas while parking her vehicle in the garage. Customer further claims that in the second incident the same thing happened while entering an intersection.
3613	CAMRY	2007	1/23/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she was getting ready to turn and the vehicle started to accelerate on its own and she had to put the brakes on hard. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3614	CAMRY	2009	1/23/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked and accelerated quickly.
3615	COROLLA	2006	1/23/2010	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle suddenly accelerated while in reverse, and that he was able to stop it by pressing hard on the brakes.
3616	RAV 4	2010	1/23/2010	Customer called in regarding his 2010 Toyota Rav4. Specifically, the customer claims the vehicle revs and has a high idle which caused sudden unintended acceleration. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurs while the vehicle is at a complete stop
3617	SIENNA	2005	1/23/2010	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on unknown dates her engine roared when she started the vehicle and jerked while driving.
3618	CAMRY	2006	1/23/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date in 2009, the vehicle took off and caused an accident. Customer further claims that on unknown dates the accelerator pedal has stuck several times.

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3619	RAV 4	2009	1/23/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer has experienced problems with the vehicle, but neglected to provide any other information regarding his/her concerns. FTS did not inspect the vehicle.
3620	PRIUS	2010	1/23/2010	Customer called in regarding a 2010 Toyota Prius. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurs while the vehicle is at a full stop.
3621	CAMRY	2005	1/23/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, on two occasions, she was involved in two incidents. On one occasion, while coming to a stop, her brakes failed. When she pushed her brake harder the [accelerator] popped up.
3622	CAMRY	2010	1/23/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date she was at a drive thru bank and the vehicle took off, causing her to hit everything in the aisle and the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3623	RAV 4	2009	1/23/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle began to experience a high idle speed and started revving. It is unknown if FTS inspected the vehicle. The customer further claims the revving occurred while the vehicle was completely stopped.
3624	COROLLA	2009	1/23/2010	Customer called regarding her 2009 Toyota Corolla STD. Specifically, customer claims that on an unknown date, she pulled up to her mailbox and her vehicle jumped unexpectedly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3625	TUNDRA	2007	1/23/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle reached high rpms of approximately 3000 to 4000 upon starting up. Customer further claims that the rpms eventually come down. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3626	TUNDRA	2006	1/23/2010	Customer called regarding his 2006 Toyota Tundra. Specifically, customer claims that, on unknown dates, he was driving on the highway and lost control of the vehicle but no accident occurred.
3627	RAV 4	2005	1/23/2010	Customer called regarding her 2005 Toyota RAV4. Specifically, customer claims that on an unknown date, the acceleration pedal stuck several times.
3628	HIGHLANDER	2004	1/23/2010	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on January 9, 2010, she was backing up in her driveway when the vehicle suddenly accelerated, colliding through a brick and cinderblock wall. Customer then pulled forward, and the vehicle took off again, resulting in a second collision. Customer further claims that the dealer replaced a computer chip in the vehicle, and she has had no further issues. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3629	RAV 4	2009	1/23/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was at a complete stop.
3630	HIGHLANDER	2010	1/23/2010	Customer called regarding her 2010 Highlander LTD. Specifically, customer claims that on at least 3 unknown dates her vehicle lurched forward on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3631	AVALON	2006	1/23/2010	Customer called regarding his 2006 Toyota Avalon XL. Specifically, customer claims that on an unknown date in September, she tried slowing down to avoid a dog and the car sped up and hit a pole.
3632	AVALON	2006	1/23/2010	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on three separate unknown dates, the vehicle accelerated unexpectedly from 65 mph to 90 mph while driving on the highway with cruise control. Customer claims he took the vehicle into the dealer.
3633	CAMRY	2009	1/23/2010	Customer called regarding her 2009 Toyota Camry LE and 2010 Rav4. Specifically, customer claims that on unknown dates her husband has experienced the vehicle lunging forward. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3634	MATRIX	2006	1/23/2010	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, his vehicle accelerated unintentionally, causing him to hit a garage door.

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3635	COROLLA	2008	1/23/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal got stuck two or three times.
3636	CAMRY	2002	1/23/2010	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on January 18, 2010 her vehicle accelerated out of control and she hit another vehicle.
3637	CAMRY	2004	1/23/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date in 2008 he was making a turn when the vehicle leaped forward. Customer further claims that he was able to get the vehicle into neutral, and that by hitting the gas pedal hard with his foot he was able to stop the vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3638	CAMRY	2007	1/23/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she experienced unintended acceleration on her vehicle approximately a year ago.
3639	CAMRY	2008	1/23/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates his vehicle has experienced a form of acceleration.
3640	RAV 4	2008	1/23/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own, when driving at 25 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3641	COROLLA	2007	1/23/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated and jumped forward while she was making a turn. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3642	MATRIX	2006	1/23/2010	Customer called regarding his 2006 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, his vehicle accelerated unintentionally and he hit and broke a garage door.
3643	COROLLA	2010	1/23/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that unknown dates the vehicle continued to lurch forward when she pressed on the brake. Customer further claims that she had to press the brake all the way down before the vehicle started to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3644	SCION tC	2008	1/23/2010	Customer called regarding her 2008 Scion TC. Specifically, customer claims that on three separate unknown dates her car accelerated and started running away. Customer further claims that vehicle would not stop initially.
3645	CAMRY	2008	1/23/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates he experienced slight unintended acceleration with his vehicle.
3646	RAV 4	2007	1/23/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck, and when the pedal is pressed, the vehicle surged forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3647	COROLLA	2007	1/23/2010	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated by itself.
3648	Corolla	2009	1/23/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, his vehicle accelerated unintentionally.
3649	CAMRY	2010	1/23/2010	Customer called regarding his 2010 Toyota Camry. Customer claims that on an unknown date, the gas pedal stuck twice. Customer further claims that he had to physically pull the brake pedal back up.
3650	Corolla	2010	1/25/2010	Customer claims that vehicle feels like it accelerates on its own, and that this is most noticeable at slow speeds. Floor mats inspected, vehicle test driven with techstream, accelerator pedal inspected for mechanical failure. No repair.
3651	MATRIX	2009	1/25/2010	Customer's husband called regarding customer's 2009 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates the vehicle jerked when it came to a stop.
3652	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on unknown dates the car will jump before it stops. Customer further claims she's had other Toyota vehicles and none of them responded this way. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3653	AVALON	2005	1/25/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lurched forward when she goes to or from a stopping point. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3654	CAMRY	2004	1/25/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that in January 2010, the vehicle was running as if the accelerator had been pressed even though it had not been.

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3655	TACOMA	2009	1/25/2010	Customer called regarding her 2009 Toyota Tacoma PreRunner. Specifically, customer claims that on an unknown date the vehicle accelerated when she put it into drive, causing her to run into her farm lawn mower. Customer further claims that the vehicle was drivable and that the incident had not occurred again. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3656	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the engine raced and backfired.
3657	CAMRY SOLARA SE	2004	1/25/2010	Customer called regarding his 2004 Toyota Camry Solara SE. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration.
3658	SIENNA	2005	1/25/2010	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that on January 3, 2010, the vehicle took off on its own and ran into a fire hydrant. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3659	CAMRY	2003	1/25/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date, her vehicle unexpectedly accelerated. Customer states that the sudden acceleration occurred while the vehicle was already in motion.
3660	COROLLA	2005	1/25/2010	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that in January 2010 the vehicle accelerated on its own while she was parallel parking, causing her to bump into another vehicle.
3661	RAV 4	2009	1/25/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, which caused an accident on 1/15/2010. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
3662	RAV 4	2009	1/25/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle jumped and accelerated, then slowed down as she drove.
3663	RAV 4	2009	1/25/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle's brakes grind while decelerating. FTS did not inspect the vehicle. This is not an unintended acceleration claim.
3664	TACOMA	2008	1/25/2010	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that she is having concerns regarding unintended acceleration. Customer further claims that when she is at a stop, the vehicle surges even though she has her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3665	CAMRY	2007	1/25/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle was surging. Customer further claims that he has had this concern since day one and that the vehicle has never provided a smooth ride.
3666	AVALON	2008	1/25/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged.
3667	ES 330	2005	1/25/2010	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates vehicle twice exhibited unintended acceleration while in motion.
3668	CAMRY	2007	1/25/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he was involved in a minor accident on January 23, 2010. Customer states that he applied the brakes but the vehicle did not stop, causing him to collide with another vehicle.
3669	AVALON	2005	1/25/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on three occasions, the customer experienced unintentional acceleration. On one occasion, the vehicle shot forward into the street and the vehicle coming toward him swerved. On the second occasion, the vehicle accelerated into garage.
3670	RAV 4	2007	1/25/2010	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date, he experienced his accelerator pedal sticking.
3671	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she was driving into a parking lot and the vehicle accelerated on its own, causing her to hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3672	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates her husband felt the vehicle having acceleration concerns.
3673	COROLLA	2006	1/25/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal got stuck and there was sometimes a burning smell.
3674	CAMRY	2005	1/25/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that while pulling out of a parking space, her accelerator got stuck causing her to hit a vehicle behind her.

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3675	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates her mother has had acceleration problems with the vehicle and had an accident in May 2008.
3676	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle jumped sometimes when driving and the pedal sometimes got stuck.
3677	FJ CRUISER	2007	1/25/2010	Customer called regarding his 2007 Toyota FJ Cruiser. Specifically, customer claims that on two unknown dates, he experienced incidents with accelerator concerns. Customer further claims that when he reversed and his foot was on the gas pedal, his accelerator idled extremely high.
3678	PRIUS	2010	1/25/2010	Customer called regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but 6-10 times since purchase of vehicle in August 2009, she has experienced small unexplained bursts of acceleration when going down a hill and not pressing accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3679	ES 330	2004	1/25/2010	Customer called regarding her 2004 Lexus ES 330. Specifically, customer claims that on an unknown date in February 2009 she was involved in an accident.
3680	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on multiple unknown dates her vehicle has occasional delays during acceleration and surging during braking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3681	AVALON	2008	1/25/2010	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on January 25, 2010 the vehicle accelerated at full throttle and the RPM shot up as he pulled into a parking space, causing him to run into his apartment building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3682	CAMRY	2006	1/25/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he was at a stop light when the vehicle began to race. Customer further claims that he stepped on the brake as hard as he could and the vehicle continued to move, and only stopped when he put it in park. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3683	TACOMA	2003	1/25/2010	Customer called regarding his 2003 Toyota Tacoma. Specifically, customer claims that, on unknown dates, the vehicle throttle hangs by itself.
3684	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on May 1, 2009 the vehicle's gas pedal got stuck and the vehicle lunged forward when she took her foot off the brake to press the gas pedal while at a complete stop, causing her to rear end another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3685	RAV 4	2010	1/25/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on an unspecified date. FTS did not inspect the vehicle. The customer further claims the vehicle was already in motion at the time of the claimed sudden acceleration.
3686	CAMRY	2007	1/25/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that the vehicle once accelerated on its own.
3687	CAMRY	2008	1/25/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle's gas pedal has gotten stuck several times.
3688	COROLLA	2010	1/25/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date, he experienced acceleration.
3689	AVALON	2007	1/25/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged on its own.
3690	AVALON	2007	1/25/2010	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while parking in a lot, the vehicle accelerated on its own. On another occasion, the vehicle accelerated while in a parking spot backing up. Customer further claims that she put the car in drive, the vehicle revved up on her and she shot forward, hit a curb, requiring the vehicle to be realigned. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3691	COROLLA	2010	1/25/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on two unknown dates the vehicle seemed to accelerate on its own.
3692	AVALON	2007	1/25/2010	Customer claims that that on an unknown date her 2007 Toyota Avalon Limited unintentionally accelerated. Customer claims that that while pulling into a parking space, the vehicle accelerated on its own. Specifically, customer claims that on the vehicle revved up and shot forward, she hopped over two curbs and hit another before stopping. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3693	CAMRY	2008	1/25/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates his vehicles feels like it accelerates when he applies the brakes.
3694	CAMRY	2009	1/25/2010	Customer called regarding his 2009 Toyota Camry XLE. Specifically, customer claims that on 1/23/10 he was pulling into the garage when the vehicle just took off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3695	TUNDRA	2008	1/25/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration. Customer further claims that since going to the dealer to adjust and properly install the floor mats, he has not had any further instances of unintended acceleration.
3696	HIGHLANDER	2005	1/25/2010	Customer's husband called regarding her 2005 Toyota Highlander. Specifically, customer claims that in February 2009 the vehicle lunged when she took her foot off the brake, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
3697	CAMRY SOLARA SE	2003	1/25/2010	Customer called regarding her 2003 Toyota Camry Solara. Specifically, customer claims that on January 8, 2010, as she lightly applied the accelerator, her car took off. Customer further claims that this caused her to run into a parked car. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3698	ES350	2008	1/25/2010	Customer's wife called regarding customer's 2008 Lexus ES 350. Specifically, customer's wife claims that in May 2009 the vehicle jumped forward as she was leaving a parking garage, causing her to crash into two parked vehicles and some bushes. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3699	YARIS	2009	1/25/2010	Customer called regarding her 2009 Toyota Yaris. Specifically, customer claims that, on unknown dates, the vehicle got stuck in throttle position. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3700	CAMRY	2010	1/25/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle was raising.
3701	AVALON	2006	1/25/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, she experienced some revving up, so she took the key out of the ignition to stop the vehicle from moving forward. Customer claims that the sudden acceleration occurred while the vehicle was in the parked position.
3702	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates when she drove her car up to 45 mph, it felt "funny."
3703	CAMRY	2002	1/25/2010	Customer called regarding his 2002 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date he experienced his accelerator sticking.
3704	Tundra	2008	1/25/2010	Customer called regarding his 2008 Toyota Tundra. Specifically, customer claims that on an unknown date, his vehicle accelerated, causing damage to the vehicle.
3705	COROLLA	2010	1/25/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, on an unknown date was in a parking lot and the vehicle would not stop when he pressed on the brakes, and the vehicle hit a median. Customer further claims that on an unknown date he was driving on the freeway and the vehicle did not slow down when he pressed on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3706	TACOMA	2007	1/25/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated in 1/2010. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion and the engine began revving.
3707	TUNDRA	2008	1/25/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that the vehicle lunged forward when it was put in drive from a parked position. Customer further claims that this caused an accident. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
3708	COROLLA	2008	1/25/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal got stuck.
3709	TUNDRA	2005	1/25/2010	Customer called regarding her 2005 Toyota Tundra. Specifically, customer claims that, on unknown dates, the accelerator pedal went all the way to the floor and the vehicle kept going. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3710	CAMRY	2004	1/25/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on August 19, 2006, she was in an accident due to unintended acceleration. Customer further claims that she was coming out of an automated car wash and attempted to accelerate when the vehicle shot forward on its own. Customer claims that the gas pedal became stuck but that a floor mat was not involved. Customer claims that the entire passenger's side of her vehicle collided with a metal fence.

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3711	COROLLA	2007	1/25/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle experienced an accelerator pedal issue.
3712	COROLLA	2010	1/25/2010	Insurance agent called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle suddenly accelerated.
3713	CAMRY	2006	1/25/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated unintentionally, causing her to run through her garage door. Customer further claims that on an unknown date she was driving downhill when the vehicle took off like a plane flying and went over 100 feet before she could stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3714	CAMRY	2006	1/25/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jerked when he drove, and the gas pedal has gotten stuck.
3715	AVALON	2008	1/25/2010	Customer called regarding her 2008 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, her vehicle hesitates and then just launches. Customer further claims the hesitation takes approximately 5-6 seconds. Customer claims she has not had any issue with the gas pedal sticking.
3716	COROLLA	2010	1/25/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 5, 2010, her son crashed into the back of a truck when he applied the brakes but the car would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3717	ES350	2007	1/25/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that in 2009, the vehicle accelerated and the condition occurred once again on the week before January 25, 2010. Customer claims he took the vehicle to the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3718	AVALON	2008	1/25/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, she has experienced vehicle acceleration.
3719	COROLLA	2008	1/25/2010	Customer called regarding his 2008 Toyota Corolla. Specifically, customer claims that in January 2010 the vehicle's accelerator pedal got stuck.
3720	CAMRY	2003	1/25/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle revved up on her. Customer further claims that the brakes felt as though they were trying to catch but the vehicle would not stop.
3721	CAMRY	2007	1/25/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle hesitated and jumped when she tried to accelerate.
3722	COROLLA	2007	1/25/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on an unknown date, she was in an accident.
3723	AVALON	2008	1/25/2010	Customer called regarding his 2008 Toyota Avalon XL. Specifically, customer claims that in the first week of July 2009, he and his wife were pulling into a parking space and the vehicle had unintended acceleration.
3724	COROLLA	2007	1/25/2010	Customer's friend called regarding customer's 2007 Toyota Corolla. Specifically, customer's friend claims that on an unknown date the vehicle went into a parking lot and through two plate glass windows.
3725	CAMRY	2003	1/25/2010	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date 3 years ago his pedal kept sticking. Customer further claims that the vehicle accelerated while his wife was parking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3726	CAMRY	2010	1/25/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date her husband was driving and the vehicle accelerated on its own. Customer further claims that the vehicle hesitates to accelerate. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3727	CAMRY	2009	1/25/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was backing into the garage when his vehicle took off, causing him to hit the fence. Customer further claims that he then put the vehicle in park to stop it.
3728	AVALON	2006	1/25/2010	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while going downhill he applied the brakes and the RPM jumped up about 500 and the vehicle accelerated quickly. Customer further claims that when he stepped on the vehicle's brake pedal, the vehicle went faster. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3729	COROLLA	2007	1/25/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on January 13, 2009, S62 the vehicle's gas pedal surged and ran into another vehicle, a dividing wall, and a pole.
3730	AVALON	2007	1/25/2010	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer called with a concern regarding unintended acceleration.

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3731	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on 1/8/2010, her daughter had an accident.
3732	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced her vehicle slightly accelerating.
3733	CAMRY	2007	1/25/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she had to put two feet on the brake to stop the vehicle. Customer further claims that on an unknown date the vehicle surged while she was pulling into a parking space. Customer further claims that she had problems with the engine light coming on and problems with the wheel locking up and starting the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3734	COROLLA	2009	1/25/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date her son was driving and the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3735	CAMRY	2010	1/25/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3736	AVALON	2006	1/25/2010	Customer emailed regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle lurched forward while she was pulling into a parking spot at approximately 5 mph with her foot on the brake, causing the vehicle to go over the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3737	CAMRY	2007	1/25/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his wife was driving the vehicle on or about December 1, 2007 and was in an accident due to the fact that the brakes did not work despite the fact that she stepped on them.
3738	AVALON	2007	1/25/2010	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on the Monday prior to January 25, 2010, he was involved in an accident. Customer claims that he was traveling at about 35 mph and tried to stop the vehicle but it failed and he hit the vehicle in front of him. Customer's vehicle was taken to the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3739	CAMRY SOLARA SLE	2004	1/25/2010	Customer called regarding her 2004 Toyota Camry Solara SLE (V6). Specifically, customer claims that on an unknown date her vehicle accelerated as she pulled up to her garage causing her vehicle to go through the garage door and hit the vehicle inside the garage causing the second vehicle to go through the interior garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3740	RAV 4	2009	1/25/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 12/4/2009. It is unknown if FTS inspected the vehicle. The customer further claims the vehicle was already in motion at the time of the claimed sudden acceleration.
3741	CAMRY	2009	1/25/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims on an unknown date while making a left hand turn at 40 mph, another vehicle ran into the rear passenger side of his vehicle. Customer further claims that his own vehicle would not accerelate at the time, and that had he been able to accerelate he probably would not have been hit.
3742	CAMRY	2009	1/25/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while his wife was driving, their vehicle was revving and accelerating. Customer further claims that the vehicle accelerated on three different occasions.
3743	COROLLA	2007	1/25/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on December 10, 2009 the vehicle accelerated on its own and jumped a concrete block while she was turning around a corner to park, causing her to run into her condo. Customer further claims that in June 2009 the vehicle jumped a parking block and ran into some bushes while she was parking by a pool. Customer further claims that on an unknown date in 2009 the vehicle jumped forward from a stop and hit the vehicle in front of her while she was in a parking lot. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3744	MATRIX	2008	1/25/2010	Customer called regarding her 2008 Toyota Corolla MA. Specifically, customer claims that on an unknown date, she experienced issues with her pedal.

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3745	CAMRY	2005	1/25/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on January 5, 2010, while his wife was backing up, the vehicle accelerated on its own. She tried to apply the brakes, but the vehicle continued to accelerate. Customer claims that she hit a pole and a stack of bricks.
3746	COROLLA	2007	1/25/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on January 24, 2010 the vehicle's gas pedal got stuck while her son was driving on the highway with the cruise control.
3747	AVALON	2008	1/25/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on January 1, 2010, while moving his parked vehicle into his garage, he touched the accelerator and without warning the engine roared and accelerated, causing him to hit the garage. Customer claims that he put the vehicle in reverse and it shot out. Customer claims that he had to have 15 stitches on his head requiring a specialist's attention. Customer refused to have the vehicle inspected. Customer claims that the sudden acceleration occurred while shifting the vehicle into drive from a parked position.
3748	RAV 4	2009	1/25/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion and the engine began roaring.
3749	COROLLA	2006	1/25/2010	Customer called regarding his 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated and went out of control for about 1/4 of a mile when coming off of a hill.
3750	CAMRY	2005	1/25/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, she experienced the acceleration issue causing her to hit a pole in a parking lot.
3751	COROLLA	2010	1/25/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle jumped forward and took off on its own when she turned left to park the vehicle. Customer further claims that the vehicle stopped when she slammed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3752	CAMRY	2006	1/25/2010	Customer called regarding his 2006 Toyota Camry XLE (V6). Specifically, customer claims that on January 23, 2009, he was parking his vehicle when the vehicle suddenly accelerated by itself and drove over a side walk, across a grassy area and into a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3753	CAMRY	2007	1/25/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his accelerator became stuck and almost caused an accident. Customer further claims that on January 9, 2010, he was driving through a toll booth and stopped to pay the toll. Customer states that as he left the toll booth and accelerated, and released the accelerator pedal slowly once he had reached the desired speed. Customer claims that although he released the pedal, the vehicle's speed increased to 80 miles per hour. Customer claims that pressing on the brakes did not slow the vehicle. Thus, customer states that he put the vehicle into neutral, but that the rpm reached over 7000 at this time. Customer claims he was able to stop the vehicle and then noticed that the gas pedal had been stuck to the carpet.
3754	Camry	2007	1/25/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date, he experienced the accelerator sticking.
3755	CAMRY	2004	1/25/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that in 2008 she was driving the vehicle in a parking lot when the vehicle just took off. Customer claims that she then applied the brakes, causing the vehicle to come to a stop. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3756	RX 400h	2006	1/25/2010	Customer called regarding her 2006 Lexus Rx 400h Hybrid. Specifically, customer claims that on an unknown date her vehicle surged causing her to lose control and strike another vehicle.
3757	SCION TC	2006	1/25/2010	Customer called regarding her 2006 Scion TC. Customer's son was driving at the time of the accident. Customer claims that on September 2, 2008 the vehicle unintentionally accelerated causing an accident.
3758	RAV4	2008	1/25/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date, the vehicle took off, causing her to hit a steel gate, a wall, and then flip over. Customer further claims that at the time of the accident she had just taken her foot off of the break pedal. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.

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3759	MATRIX	2008	1/25/2010	Customer called regarding her 2008 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates, she felt the vehicle jump. Customer further claims that this especially happened when the vehicle was in reverse.
3760	4RUNNER	2008	1/25/2010	Customer called regarding 2008 Toyota 4Runner. Specifically, customer claims that in 2009, his vehicle was in third gear when the vehicle's speed reached 100 miles per hour with the RPM in red.
3761	COROLLA	2008	1/25/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that in September 2009 the vehicle suddenly accelerated into her garage while she was getting ready to park the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3762	CAMRY	2005	1/25/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates in February and October of 2009, she was involved in two accidents. On or about October 13, 2009, customer claims, while pulling into a parking space, she pressed the brakes and the vehicle started to surge forward, causing her to run into a wall. On another occasion, in February of 2009, a similar accident occurred.
3763	RAV 4	2008	1/25/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck. Customer did not state whether the sudden acceleration occurred while the vehicle was already in motion or at a full stop.
3764	CAMRY	2002	1/25/2010	Customer called regarding his 2002 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle accelerated suddenly while his wife was driving the vehicle. Customer further claims that his wife was unable to stop the vehicle. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
3765	RAV 4	2008	1/25/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle lurched forward. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3766	TACOMA	2006	1/25/2010	Customer called regarding her 2006 Toyota Tacoma. Specifically, customer claims that on July 24, 2009 the vehicle took off and would not stop when she pressed the brakes while driving in a neighbor's field, causing her to run into a couple of fences. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3767	SIENNA	2005	1/25/2010	Customer called regarding her 2005 Toyota Sienna. Specifically, customer claims that, July 22, 2009, the vehicle was in an accident. This claim does not appear to be responsive.
3768	TUNDRA	2008	1/25/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that in late December 2009 the vehicle accelerated on its own as he was exiting the vehicle in his garage. Customer further claims that he put the vehicle in park before exiting the vehicle, and that the vehicle stopped when it hit the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3769	CAMRY SOLARA	2008	1/25/2010	Customer called regarding her 2008 Toyota Camry Solara. Specifically, customer claims that on January 12, 2010, her vehicle experienced unintended acceleration, causing her to collide with a post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3770	AVALON	2005	1/25/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that two months prior to January 25, 2010, while driving down the road, she pressed the brakes and the vehicle suddenly accelerated, causing her to hit another vehicle. Customer claims that this was the second time the incident occurred. Customer claims that the first sudden acceleration occurred while the vehicle was already in motion.
3771	AVALON	2007	1/25/2010	Customer called regarding his 2007 Avalon XLS. Specifically, customer did not have a specific claim, but rather, had a concern about acceleration.
3772	MATRIX	2009	1/25/2010	Service manager called regarding customer's 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date the vehicle accelerated while driving on the highway. Customer further claims that the brakes were not working. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3773	CAMRY	2006	1/25/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date she was pulling into a parking space and the vehicle would not stop. Customer further claims that she had to stand on the brake pedal, and that the vehicle jumped onto a cement block. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3774	COROLLA	2010	1/25/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on January 17, 2010, he was pulling into a parking space when the vehicle suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3775	AVALON	2006	1/25/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on January 25, 2010 the vehicle's gas pedal got stuck.
3776	CAMRY	2010	1/25/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on an unknown date she was parking in her driveway when the vehicle accelerated on its own. She pressed the brake ten times and eventually the vehicle stopped. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3777	CAMRY	2004	1/25/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on June 13, 2009, she was involved in an accident caused by unintended acceleration. Customer further claims that she lost control of the vehicle and hit a wooden porch, causing front-end damage to her vehicle. Customer states that she believes her gas pedal malfunctioned, causing her vehicle to accelerate. Customer states that she had her foot on the brake during the acceleration incident.
3778	CAMRY	2007	1/25/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle intermittently hesitated then jumped forward when she pressed the accelerator. Customer further claims that the vehicle vibrated when she began to release the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3779	CAMRY	2005	1/25/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on January 25, 2010, while driving with her foot on the accelerator, the vehicle suddenly zoomed down the street.
3780	SEQUOIA	2005	1/25/2010	Customer called regarding his 2005 Toyota Sequoia. Without providing specifics, customer claims that on unknown dates his vehicle has experienced unintended acceleration.
3781	CAMRY	2009	1/25/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 1/19/10 she was parallel parking and was in reverse when the vehicle suddenly accelerated backwards and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3782	AVALON	2007	1/25/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle's accelerator pedal got stuck and the vehicle took off when her mother was trying to park in front of her house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3783	PRIUS	2010	1/25/2010	Customer emailed regarding his 2010 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle had an acceleration lag and the vehicle surged forward when he put his foot on the gas pedal.
3784	PRIUS	2010	1/25/2010	Customer called regarding his 2010 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle surged on three occasions when his foot was on the gas pedal and driving at 20-30 mph.
3785	RAV 4	2008	1/25/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck. Customer did not state whether the sudden acceleration occurred while the vehicle was already in motion or at a full stop.
3786	COROLLA	2008	1/25/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal got stuck and burned lots of gas.
3787	CAMRY	2010	1/25/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3788	CAMRY	2010	1/25/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that his vehicle suddenly accelerated. The particulars of the underlying incident are unknown.
3789	COROLLA	2009	1/25/2010	Customer's daughter called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle was in an accident. A Field Technical Specialist inspected the vehicle.
3790	COROLLA	2010	1/26/2010	Customer's called regarding his 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal got stuck on two occasions, once on the highway and once on a local road. Customer further claims that the vehicle bucked forward and the RPM went up to 2000 when his wife came to a stop with her foot on the brake.
3791	PRIUS	2010	1/26/2010	Customer called regarding her 2010 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle surged ahead when she pressed the accelerator.
3792	RAV 4	2007	1/26/2010	Customer called regarding his 2007 Toyota RAV4. Specifically, customer claims that on an unknown date, he attempted to brake and the vehicle continued to move.

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3793	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her vehicle was involved in an accident when the vehicle failed to stop or slow down on the highway despite depression of the brakes.
3794	COROLLA	2007	1/26/2010	Customer called regarding his 2007 Toyota Corolla. Specifically, customer claims that on an unknown date, he experienced pedal sticking problems.
3795	TUNDRA	2005	1/26/2010	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that, on November 2006, the vehicle was stopped at intersection and while he pushed on accelerator the vehicle raced off and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3796	CAMRY	2004	1/26/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that she was coming down a hill and was coming to a stop when there was a "loud noise of acceleration." Customer further claims that she bumped the vehicle in front of her. Customer claims that she did not have her foot on the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3797	COROLLA	2006	1/26/2010	Customer's husband called regarding customer's 2006 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal got stuck and the vehicle experienced unintended acceleration.
3798	RAV 4	2009	1/26/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle tended to surge forward when coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3799	RAV 4	2007	1/26/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date, when she was backing into the garage, the vehicle took off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3800	AVALON	2005	1/26/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, while attempting to exit the interstate, she applied the brakes but the vehicle revved up. Customer further claims that she applied the brakes and that the vehicle left 10 feet of tire marks. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3801	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 19, 2010, she was parking in front of her house and took her foot off the gas pedal to apply the brakes when the vehicle surged forward and hit her granddaughter's boyfriend, who was sitting in a chair. The vehicle then hit the house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3802	CAMRY	2009	1/26/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date her son had an experience where the vehicle accelerated on its own. Customer further claims that her son had a loose floor mat at the time.
3803	RAV 4	2009	1/26/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on January 12, 2010 the vehicle lunged forward really fast while she was parking, causing her to run into a concrete wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3804	COROLLA	2007	1/26/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator pedal intermittently got stuck.
3805	CAMRY	2010	1/26/2010	Customer called regarding her 2005 Toyota Avalon and 2010 Toyota Camry. Specifically, customer claims that on an unknown date her 2005 Toyota Avalon suddenly jerked forward, causing her to rear end the car in front of her. Customer alleges that she is concerned that a similar incident could occur with her new 2010 Toyota Camry.
3806	CAMRY	2005	1/26/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on three different occasions, on three different dates, she experienced unintended acceleration. Customer claims that on two occasions, the unintended acceleration occurred while the vehicle was in drive, and on one occasion, the unintended acceleration occurred while she was in drive.
3807	MATRIX	2009	1/26/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on November 16, 2009, he was pulling into a parking space when the vehicle accelerated. The vehicle went over the curb and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3808	AVALON	2005	1/26/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on or about two years before January 26, 2010, he started having acceleration concerns but did not pay much attention to the issues. Customer claims that that a vehicle gets a big burst of speed then sticks there for 30 seconds and then suddenly decreases in speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3809	CAMRY	2009	1/26/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced concern with her vehicle 2 or 3 times.
3810	COROLLA	2006	1/26/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle did not stop when she stepped on the brake while pulling into the driveway, causing her to run into the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3811	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she is scared of driving her car because she has heard of the pedal concern.
3812	Camry	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date, she experienced problems with her accelerator pedal.
3813	IS250	2007	1/26/2010	Customer called regarding her 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, her vehicle accelerated on its own.
3814	SIENNA	2004	1/26/2010	Customer's mother called regarding her 2004 Toyota Sienna. Specifically, customer's mother claims that on unknown dates customer's acceleration pedal was sticking.
3815	ES350	2008	1/26/2010	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, she had an unexpected acceleration concern with her vehicle.
3816	AVALON	2007	1/26/2010	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on an unknown date while driving down his driveway his vehicle failed to slow down. Customer further claims that a similar incident happened a second time. Customer took the vehicle to the dealer for a replacement part.
3817	CAMRY	2007	1/26/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he experienced unintended acceleration in January 2010. The details of the underlying incident are unclear.
3818	COROLLA	2009	1/26/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates, when the vehicle was taken out of cruise control, it would accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3819	RAV 4	2009	1/26/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle made a revving noise when she was at a stop light, and that the vehicle pulled when her foot was on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3820	CAMRY	2004	1/26/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on February 19, 2009, she was involved in a car accident in which her car was totaled. Customer further claims that the vehicle accelerated while she applied the brakes when backing up the car. Customer claims that the vehicle hit a tree, after which the impact threw the car forward, causing her to hit a parked car. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3821	RX 350	2007	1/26/2010	Customer called regarding her 2007 Lexus RX 350. Specifically, customer claims that on an unknown date she drove through her garage into her house because of unwanted acceleration. Customer further claims that the vehicle surged as she tried to apply the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3822	CAMRY	2009	1/26/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was pulling into a parking spot when his vehicle accelerated unintentionally and he hit a building. Customer further states that there was airbag deployment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3823	AVALON	2007	1/26/2010	Customer called regarding his 2007 Avalon Limited. Specifically, customer claims that on January 26, 2010, he experienced unintended acceleration. Customer claims that he put the vehicle in neutral and drove the car up onto a curb to avoid running into traffic. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3824	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle experienced fast idling. Customer further claims that when on unknown dates when she came out of the garage, the vehicle accelerated; then when she drove on a flat road the vehicle accelerated even when she took her foot off the accelerator.
3825	COROLLA	2010	1/26/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates she experienced unintended acceleration.

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3826	CAMRY	2009	1/26/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on January 25, 2010, while coming to a traffic light, she went to apply the brakes and the gas pedal went downwards. Customer further claims that the pedal was depressed to the floor and then she put the vehicle in park. She states that all of the (relay) lights in the vehicle started flashing and various unknown noises came from the vehicle--like the noise when the seatbelt is not on.
3827	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates her brakes were not stopping the vehicle.
3828	RAV 4	2007	1/26/2010	Customer emailed regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she pressed on the accelerator pedal and the vehicle sped up quickly. When she released the pedal, the vehicle slowed down to 25 mph. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3829	TUNDRA	2000	1/26/2010	Customer called regarding his 2000 Toyota Tundra 4x2 SR5 (V8). Specifically, customer claims that on January 14, 2010 his vehicle accelerated while he was pulling into a parking space, causing the vehicle to hit a concrete wall at approximately 1mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3830	AVALON	2008	1/26/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, his wife experienced unintended acceleration and pedal sticking. Customer claims that while at a stop light, his wife took her foot off of the accelerator and the vehicle accelerated.
3831	CAMRY	2002	1/26/2010	Customer called regarding his 2002 Toyota Camry SE (V6). Specifically, customer claims that on at least 5 unknown dates his vehicle has experienced pedal acceleration. Customer further claims that on one of these occasions he pressed the brake to stop and the engine stalled and on another occasion he was in an intersection and almost hit another vehicle.
3832	CAMRY	2006	1/26/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle slowed down then accelerated on its own.
3833	COROLLA	2009	1/26/2010	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on December 24, 2009, he was almost stopped when the vehicle lurched forward and hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3834	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that when she starts the vehicle and releases her foot from the brake pedal, the vehicle accelerates to approximately 5 to 10 miles per hour before she presses the gas pedal. Customer further claims that the car revs up when this occurs. Customer states that this has happened twice. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3835	CAMRY	2010	1/26/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates his wife, who uses the vehicle, experiences high RPMs even when bringing the vehicle to a stop. Customer further claims that the vehicle lags a little when braking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3836	COROLLA	2008	1/26/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle was involved in an accident and that it may have had something to do with the accelerator.
3837	CAMRY	2005	1/26/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on January 24, 2009, she experienced a concern with her accelerator pedal. Customer claims that while driving 65 MPH the car jumped the median, the engine revved and went into another lane. Customer claims that she hit a steel pole and a truck.
3838	TACOMA	2009	1/26/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle lunged and the gas pedal stuck.
3839	COROLLA	2008	1/26/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on unknown dates in 2009 the vehicle's accelerator pedal went down by itself. Customer further claims that the first instance happened in April 2009 when she was parking. Customer further claims that it happened again in November or December of 2009 when she was driving at 20-30 mph.
3840	TACOMA	2010	1/26/2010	Customer called regarding 2010 Toyota Tacoma Prerunner. Specifically, customer claims that when his wife was driving the vehicle, she barely tapped on the gas pedal when the vehicle lunged about 15 feet. Customer further claims that he experienced a similar situation when he was reversing the vehicle. Customer claims that unintended acceleration occurred when vehicle was already in motion.

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3841	RAV 4	2009	1/26/2010	Customer's husband called regarding customer's 2009 Toyota RAV4. Specifically, customer's husband claims that on January 24, 2010 the vehicle lurched forward and the pedal got stuck when he put his foot on the brake while at a stop light, causing an accident. Customer's husband claims that the sudden acceleration occurred while the vehicle was at a full stop.
3842	CAMRY	2007	1/26/2010	Customer called regarding his wife's 2007 Toyota Camry. Specifically, customer claims that on two unknown dates his wife's vehicle accelerated without depressing the pedal.
3843	CAMRY	2003	1/26/2010	Customer called regarding her 2003 Toyota Camry LE. Customer claims that on January 22, 2010, while reversing from a parking space, her vehicle suddenly accelerated, and pressing brakes did not stop the vehicle. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
3844	CAMRY	2006	1/26/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on January 10, 2010, she was pulling into a parking space at under 5 mph when the vehicle took off and ran into a plate glass window. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3845	Sequoia	2003	1/26/2010	Customer called regarding his 2003 Toyota Sequoia. Specifically, customer claims that on an unknown date, he experienced an accelerator problem.
3846	CAMRY SOLARA SLE	2004	1/26/2010	Customer called regarding his 2004 Toyota Camry Solara SLE (V6). Specifically, customer claims that his car has exhibited signs of the gas pedal sticking and the gas pedal is hard to depress at times.
3847	HIGHLANDER	2007	1/26/2010	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claims that on January 12, 2010, he was driving 20-25 mph when the vehicle suddenly accelerated, resulting in a four-car collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3848	COROLLA	2007	1/26/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on three unknown dates the vehicle experienced unintended acceleration and the accelerator pedal got stuck.
3849	COROLLA	2007	1/26/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on August 8, 2008 the vehicle suddenly accelerated and raced ahead through a metal barrier and into a wall when she had just finished turning into a parking stall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3850	CAMRY	2006	1/26/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he was stopped at a stop light with his foot on the brake and the vehicle moved forward on its own. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3851	AVALON	2005	1/26/2010	Customer called and emailed regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle experienced a sudden surge in speed quite a few times and had a sticking feeling in the gas pedal.
3852	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in August 2008, while trying to park her vehicle, it accelerated and jumped the curb and had to be pulled out of a ditch by a tow truck.
3853	TUNDRA	2008	1/26/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that when the vehicle is slowed down, the vehicle hesitates and the "goes on its own." Customer further claims that the vehicle jerks. Customer claims that the sudden acceleration occurs while the vehicle is already in motion.
3854	AVALON	2007	1/26/2010	Customer called regarding his 2007 Toyota Avalon Limited. Specifically, customer claims that in September of 2008, his wife drove their vehicle into their garage. Customer claims that while trying to adjust the angle of her vehicle, she put the car in reverse and it suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3855	AVALON	2009	1/26/2010	Customer called regarding her 2009 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, she experienced unintended acceleration. Customer further claims that in the three or four days preceding January 27, 2010, the customer was driving down the street and as she was approaching a stoplight, she found it very difficult to stop the vehicle. Customer claims that she has not taken the vehicle to the dealer for inspection. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3856	COROLLA	2005	1/26/2010	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's accelerator got stuck when pushed down, and that the pedal was slow to rise back up.

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3857	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in October 2009 the vehicle lunged forward into another vehicle when her mother accelerated a little while stopped on a freeway exit ramp. Customer further claims that every time her mother pressed the gas pedal the vehicle jumped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3858	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she felt that her car will not go up in speed but the gas pedal will still go down. Customer further claims that at times, the RPM will go up on its own.
3859	COROLLA	2005	1/26/2010	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle swerved and accelerated into a wall while he was trying to pass another vehicle. Customer further claims that on an unknown date the vehicle suddenly accelerated into a parked vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3860	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date in December 2009 she was driving on the highway when the vehicle suddenly lurched forward, but when she hit the brake it slowed down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3861	COROLLA	2009	1/26/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that in September 2008 she hit another vehicle when she tried to brake but the vehicle accelerated. Customer further claims that in December 2008 she hit a tree when she pressed the brake but the vehicle kept accelerating faster. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3862	CAMRY	2003	1/26/2010	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date in January 2010 as he was backing out of his garage, the pedal stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3863	LAND CRUISER	2008	1/26/2010	Customer called regarding his 2008 Toyota Land Cruiser. Specifically, customer claims that on January 26, 2010, he was backing out of the driveway when the vehicle suddenly accelerated, resulting in a collision; as he pulled forward, the vehicle suddenly accelerated again, about 50 yards. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3864	4RUNNER	2007	1/26/2010	Customer called regarding his 2007 Toyota 4Runner. Specifically, customer claims that on an unknown date in 2009 he experienced unintended acceleration. Customer further claims that during this instance, he tried to apply the brakes but the vehicle continued to accelerate.
3865	TUNDRA	2010	1/26/2010	Customer called regarding his 2010 Toyota Tundra 4x4. Specifically, customer claims that on September 1, 2009 the vehicle kept going when he pressed the brakes. Customer further claims that a short time later the vehicle experienced sudden acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3866	RAV 4	2010	1/26/2010	Customer called regarding his 2010 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle almost stopped and then surged when his wife stopped at stop signs.
3867	CAMRY	2003	1/26/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on January 22, 2010, as she was going in reverse, the vehicle shot back and jumped up from the ground. Customer further claims that she was applying the brakes as she backed up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3868	COROLLA	2009	1/26/2010	Customer emailed regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle suddenly accelerated.
3869	CAMRY	2009	1/26/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle increased in acceleration on its own, and that when the vehicle was stopped at lights the transmission rumbled. Customer further claims that every day she experienced some kind of problem with acceleration and brakes and does not feel safe.
3870	AVALON	2005	1/26/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that in approximately October or November 2009 her accelerator pedal stuck. Customer further claims that because she could not stop the vehicle, she ended up putting a dent in the front grill of the vehicle. Customer further claims that in January 2010, she was pulling out of a restaurant but was unable to stop the vehicle. Customer states that when she engaged the brake, the vehicle stopped.
3871	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle hesitated and jumped forward when she pressed the accelerator.

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3872	AVALON	2006	1/26/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle surged while stopped at a red light, and that he had to hold the brake pedal down. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3873	SIENNA	2008	1/26/2010	Customer called regarding his 2008 Toyota Sienna. Specifically, customer claims that, unknown dates, the vehicle takes off as soon as he puts the car in gear from stopping at a light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3874	AVALON	2006	1/26/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on January 25, 2010, her vehicle failed to stop and she hit two other vehicles. Customer further claims that the airbag deployed and she suffered minor injuries. The vehicle was sent to the insurance company. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3875	COROLLA	2006	1/26/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on three unknown dates the vehicle experienced unintended acceleration.
3876	COROLLA	2006	1/26/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated by itself.
3877	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle began to speed up unintentionally and surged before stopping when his daughter was driving.
3878	Corolla	2010	1/26/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date, she experienced acceleration.
3879	PRIUS	2007	1/26/2010	Customer called regarding her 2007 Toyota Prius. Specifically, customer claims that on both October 21, 2007 and July 13, 2008 the vehicle was involved in an accident. Customer further claims that in the first accident the vehicle jerked away and accelerated when her husband was sitting in traffic at an intersection. Customer further claims that in the second accident the vehicle jerked when her husband was driving about 20 mph, causing him to run into 2 trees. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
3880	CAMRY	2009	1/26/2010	Customer's husband called regarding customer's 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle sometimes sped up too quickly and surged.
3881	COROLLA	2009	1/26/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the customer was coasting into a parking space when the vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3882	COROLLA	2009	1/26/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on January 21, 2010 the vehicle surged forward when he gave it a little gas while going up a driveway, causing him to run into a bicycle and pull on an extension cord. Customer further claims that on unknown dates the vehicle idled high and the speed was inconsistent when going at 40 mph with his foot barely on the accelerator. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3883	CAMRY	2008	1/26/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates his daughter experienced unintended acceleration with the car.
3884	COROLLA	2010	1/26/2010	Customer's father called regarding customer's Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle was very sensitive and gave a "jack-rabbit."
3885	CAMRY	2003	1/26/2010	Customer emailed regarding her 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date in May 2009 her vehicle accelerated at a high rate of speed while in reverse, causing her to hit a birdhouse and almost hit a barn before stopping the vehicle by turning off the vehicle. Customer claims that when sudden acceleration occurred the vehicle was already in motion.
3886	TUNDRA	2010	1/26/2010	Customer called regarding 2010 Toyota Tundra 4X2. Specifically, customer claims that her husband was reversing the vehicle when it accelerated. Customer further claims that the vehicle jerked and accelerated for a few seconds until the driver put the vehicle in park. Customer also states that she has experienced the the same concern while driving. Customer states that it felt like the vehicle was going from 20 to 80 miles per hour when driving. Customer claims that sudden acceleration occurred when the vehicle was already in motion.
3887	CAMRY	2007	1/26/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she has experienced unintended acceleration and that her vehicle has accelerated to high speeds. Customer claims that unintended acceleration occurred while the vehicle was already in motion.

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3888	Camry	2007	1/27/2010	Customer claims that the vehicle accelerated more than it normally would when applying the gas pedal. The vehicle was test-driven with Techstream. Vehicle's floor mat, pedal and throttle body were inspected. The vehicle was checked for diagnostic trouble codes, and none were found. No repair.
3889	Camry	2010	1/27/2010	Customer claims that when accelerating from a stop, the car lurched forward. Vehicle was road tested with the customer. Visual inspection of floor mat, gas pedal and throttle body was conducted. No repair.
3890	Camry	2010	1/27/2010	Customer claims that the vehicle accelerated on its own from a stop. The vehicle was test-driven with Techstream. Vehicle's floor mat, pedal and throttle body were inspected. The vehicle was checked for diagnostic trouble codes, and none were found. No repair.
3891	Corolla	2010	1/27/2010	Customer claims that vehicle keeps on going while trying to brake, and that this is most noticable at higher speeds. Floor mats inspected, vehicle test driven with techstream, accelerator pedal inspected for mechanical failure. No repair.
3892	ES 330	2006	1/27/2010	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on unknown dates her vehicle unintentionally accelerated. An FTS inspected the vehicle.
3893	AVALON	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged.
3894	COROLLA	2006	1/27/2010	Customer called regarding her 2006 Toyota Corolla. Specifically, customer claims that on January 23, 2010 the vehicle started accelerating while she was driving on a local road, causing her to run into a snowbank and almost run into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3895	4RUNNER	2004	1/27/2010	Customer called regarding his 2004 Toyota 4Runner. Specifically, customer claims that on an unknown date he was pulling onto the freeway when the accelerator pedal became stuck. Customer further claims that he was not able to release the pedal, and had to stop the vehicle by using the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3896	SCION XD	2009	1/27/2010	Customer called regarding his 2009 Scion XD. Specifically, customer claims that on an unknown date in January 2010, his vehicle continued to accelerate even after he released the gas pedal.
3897	HIGHLANDER	2006	1/27/2010	Customer called regarding her 2006 Toyota Highlander. Specifically, customer claims that in December 2008 she was pulling into a parking lot when the vehicle lunged forward and over a concrete barrier. Customer further claims that in Spring 2009 she was driving and applied the brakes, which did not respond, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3898	CAMRY	2008	1/27/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date while driving 7 or 8 mph and trying to stop his vehicle, his vehicle accelerated and he hit the sidewalk. Customer further claims that it felt as though there was something under his gas pedal, though there was not; there are no floor mats in the vehicle now. He claims that there was a slight wobble when he drives.
3899	HIGHLANDER	2006	1/27/2010	Customer called regarding her 2006 Toyota Highlander Limited (V6). Specifically, customer claims that on unknown dates that her vehicle continued to accelerate after she removed her foot from the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3900	COROLLA	2010	1/27/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle surged and the pedal got stuck.
3901	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged when her foot was not on the gas pedal.
3902	COROLLA	2010	1/27/2010	Customer's grandson called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on January 23, 2010, she was driving and tried to slow down for a bump but the vehicle did not slow down. Customer further claims that on January 26, 2010, she had to press firmly on the brakes and use the emergency brake to stop the vehicle when parking in the driveway, and the vehicle ended up on the grass. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3903	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced vehicle acceleration three times already.
3904	CAMRY	2003	1/27/2010	Customer called regarding her husband's 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date her husband had the vehicle and it accelerated though his foot was not on the pedal.
3905	LS 460	2007	1/27/2010	Customer called regarding his 2007 Lexus LS 460. Specifically, customer claims that on unknown dates his floor mat has gotten stuck.

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3906	RAV 4	2008	1/27/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date there have been issues with the pedal.
3907	Prius	2005	1/27/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on an unknown date, she experienced sudden acceleration.
3908	HIGHLANDER	2008	1/27/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle did not brake in the snow.
3909	TUNDRA	2008	1/27/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that when the vehicle is started up, it will vibrate and lunge. Customer claims that the sudden acceleration occurs while the vehicle is at a full stop.
3910	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on unknown dates her vehicle lunged forward when she came to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3911	Camry	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date, she experienced acceleration problems.
3912	CAMRY	2003	1/27/2010	Customer called regarding his wife's 2003 Toyota Camry LE. Specifically, customer claims that on November 23, 2009, the vehicle accelerated while his wife was parking. Customer further claims that in January 2010, the vehicle accelerated as customer's wife was trying to stop.
3913	TACOMA	2008	1/27/2010	Customer's wife called regarding customer's 2008 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle accelerated on its own. Customer further claims that when at a stop sign the vehicle began accelerating. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3914	COROLLA	2009	1/27/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while at a stop light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3915	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle seemed to not get enough gas when she pressed on the gas pedal, then it jerked as it was getting too much gas, causing unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3916	CAMRY	2007	1/27/2010	Customer's husband called regarding customer's 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle took off on its own and the gas pedal surged from time to time.
3917	FJ CRUISER	2007	1/27/2010	Customer called regarding his 2007 Toyota FJ Cruiser. Specifically, customer claims that on an unknown date, the vehicle lurched forward at a stop sign. Customer further claims that this happened when he was braking and came to a fast stop.
3918	RAV 4	2009	1/27/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that in January 2010 the vehicle wouldn't go when he accelerated, and then it took off while entering an on ramp. Customer further claims that the vehicle idled high. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3919	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged and made a loud rattling noise and the pedal was sticking.
3920	CAMRY	2007	1/27/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his wife was driving the car and it took off on her. Customer further claims that his wife was in an accident due to the problem, and that he also experienced unintended acceleration when he was driving on the highway and the vehicle took off. Customer states that he had taken out his floor mats prior to the incidents. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3921	COROLLA	2005	1/27/2010	Customer called regarding his 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle has experienced accelerator pedal issues.
3922	LX 570	2009	1/27/2010	Customer called regarding his 2009 Lexus LX 570 4x4. Specifically, customer claims that on unknown dates he has experienced unintended acceleration. Customer further claims that he has had to use the emergency brake to stop the vehicle and that vehicle revved very highly. Customer claims that the sudden acceleration occurs while vehicle is already in motion and that he has experienced the revving while vehicle is at a full stop.
3923	CAMRY	2009	1/27/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 12/21/09, he was reversing his vehicle in a parking lot and the vehicle accelerated backwards and ran into a pole. Customer was not 100% sure whether he had his foot on the brake pedal at the time. Customer states that there was no driver floor mat in the vehicle at the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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3924	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 26, 2010 the vehicle's engine made noise and vehicle accelerated. Customer further claims that brakes sound "as if vehicle is a big truck."
3925	RAV 4	2008	1/27/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck and the vehicle accelerated. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3926	PRIUS	2010	1/27/2010	Customer emailed regarding his 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown date, while starting to brake at a traffic light, the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3927	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on October 30, 2008 she got into an accident where the vehicle accelerated and ran into a store window. Customer further claims that she was not able to stop the vehicle when she pressed the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3928	CAMRY	2010	1/27/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own. Customer further claims that he put the vehicle in reverse and the RPMs went up. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3929	PRIUS	2010	1/27/2010	Customer emailed regarding her 2010 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but on 5-6 occasions, when going over uneven surfaces such as a pothole, the vehicle instantly lunged forward and the acceleration was out of her control. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3930	HIGHLANDER	2008	1/27/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3931	PRIUS	2010	1/27/2010	Customer called and emailed regarding his 2010 Toyota Prius. Specifically, customer claims that in January 2010 the vehicle surged forward when he started to brake while approaching a traffic light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3932	Corolla	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates, she experienced her pedal sticking.
3933	CAMRY	2008	1/27/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates he has experienced unintended acceleration five or six times, and that when driving on the highway he had to put his foot on the brake to get vehicle to stop accelerating. Customer further claims that this acceleration occurred regardless of whether the vehicle is on cruise control.
3934	CAMRY	2010	1/27/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date he was pulling into a parking space at 1-2 mph and pressed the brake but the vehicle did not stop and jumped as it accelerated. Customer further claims that the vehicle accelerated from 2 mph to 30 mph, and he was able to stop the vehicle by pressing hard on the brakes. Customer further claims that on unknown dates he has experienced sudden acceleration twice a month. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3935	COROLLA	2009	1/27/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle experienced unintended acceleration.
3936	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle had a surging condition that occurred three or four times.
3937	CAMRY	2008	1/27/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle experienced racing acceleration and rattling sounds.
3938	HIGHLANDER	2007	1/27/2010	Customer called regarding her 2007 Toyota Highlander Limited (V6). Specifically, customer claims that on an unknown date her vehicle accelerated while pulling into a driveway, causing the vehicle to go through the wall of an apartment. Customer further claims that she put the vehicle in reverse and that the vehicle accelerated at a high rate of speed. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
3939	RAV 4	2008	1/27/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer claims that sudden acceleration occurred while the vehicle was already in motion.

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3940	SCION XB	2008	1/27/2010	Customer called regarding her 2008 Scion XB. Specifically, customer claims that on an unknown date her vehicle accelerated and jumped a curb while trying to park. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3941	AVALON	2006	1/27/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on October 23, 2009 the vehicle accelerated and ran into the vehicle in front of her while she was stopped at a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3942	TUNDRA	2007	1/27/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that his vehicle suddenly accelerated in January 2010. Customer further claims that the RPMs went to their maximum and that the brakes went out. Customer states that he was able to stop the vehicle by shifting into neutral and pulling off to the side of the road. Customer claims that sudden acceleration occurred while vehicle was already in motion.
3943	CAMRY	2006	1/27/2010	Customer emailed regarding his 2006 Toyota Camry. Specifically, customer claims that on unknown dates he has experienced problems with a surging accelerator.
3944	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle lurches. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
3945	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle was having an issue with acceleration.
3946	4RUNNER	2005	1/27/2010	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on an unknown date in 2006 her gas pedal started sticking. Customer further claims that the gas pedal has stuck 15 times since she purchased the vehicle. Customer claims that recently the gas pedal became stuck when she was at an intersection. Customer states that the brakes would not work and the vehicle continued to accelerate, reaching a speed of 80 miles per hour.
3947	RAV 4	2009	1/27/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated but failed to specify a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the claimed sudden acceleration occurred while the vehicle was already in motion.
3948	AVALON	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on unknown dates, her vehicle sped up when she used cruise control. Customer claims that she has not taken the vehicle to the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3949	AVALON	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that in January 2010, his engine revved when he stepped on the gas pedal, after which the gas pedal became stuck. Customer further claims that he had to press on the brake to get the car to stop.
3950	MATRIX	2010	1/27/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
3951	IS250	2009	1/27/2010	Customer called regarding his 2009 Lexus IS 250. Specifically, customer claims that on unknown dates, his wife experienced vehicle accelerator issues.
3952	IS250	2007	1/27/2010	Customer called regarding his 2007 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle surged forward while he was at a stop light with his foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3953	IS250	2009	1/27/2010	Customer called regarding his 2009 Lexus IS 250. Specifically, customer had questions about the gas pedal and floor mat recall. Customer claims that on an unknown date, his wife experienced unintended acceleration.
3954	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in May 2009 and in January 2010 she has twice experienced unintended acceleration with her vehicle.
3955	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that she has experienced a problem with the brakes.
3956	ES 330	2006	1/27/2010	Customer called regarding her Lexus ES 330. Specifically, customer claims that on an unknown date her accelerator stuck.
3957	RX 400h	2006	1/27/2010	Customer called regarding her 2006 Lexus RX 400h. Specifically, customer claims that on an unknown date, her vehicle accelerated suddenly.

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3958	CAMRY	2004	1/27/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on January 23, 2010, she was pulling into her driveway when the vehicle suddenly accelerated, causing her to crash into her house. Customer further claims that the throttle was fully open during the incident, and that she did not have her foot on the brake or the gas pedals. Customer states that the vehicle took off while she was rolling forward. Customer states that the gas pedal had "dropped" seven (7) or eight (8) times prior to this incident.
3959	CAMRY	2008	1/27/2010	Customer called regarding her 2008 Toyota Camry XLE (V6). Specifically, customer claims that the vehicle moved forward when she moved her foot off the brake 3 different times. Customer further claims that the vehicle accelerates on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
3960	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota camry. Specifically, customer believes that her vehicle is involved in the recall and does not know what to do about it.
3961	IS250	2009	1/27/2010	Customer called regarding her 2009 Lexus IS 250. Specifically, customer claims that on an unknown date, while trying to make a left turn her vehicle did not respond and it accelerated. Customer further claims she eventually came to a complete stop in a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3962	CAMRY	2002	1/27/2010	Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration while in motion.
3963	RAV 4	2009	1/27/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated but failed to specify a specific date. It is unknown if FTS inspected the vehicle. It is unknown if the vehicle was in motion at the time of the sudden acceleration.
3964	Camry	2004	1/27/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on unknown dates, she experienced unintended acceleration. Customer further claims that the accelerator pedal depressed on its own and that once the brake is applied, the accelerator returned to its original position.
3965	SIENNA	2006	1/27/2010	Customer called regarding his 2006 Toyota Sienna. Specifically, customer claims that, unknown dates, the vehicle was driving at 55 mph while the vehicle accelerated more. The customer further claims that while the engine is started engine revs high. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3966	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates she had issues with the vehicle accelerating aggressively. Customer further claims that when she pressed on the gas pedal the vehicle was slow to accelerate then jumped forward.
3967	ES 300	2002	1/27/2010	Customer called regarding his 2002 Lexus ES 300. Specifically, customer claims that on an unknown date his vehicle accelerated when he hit ice on a bridge. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3968	CAMRY	2008	1/27/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jumped when she pushed the gas pedal.
3969	4RUNNER	2005	1/27/2010	Customer emailed regarding her 2005 Toyota 4Runner. Specifically, customer claims that in approximately 2008 or 2009, she was involved in an accident caused by unintended acceleration. Customer further claims that her accelerator became stuck, causing a collision.
3970	ES 330	2005	1/27/2010	Customer called regarding his 2005 Lexus ES 330. Specifically, customer claims that on unknown dates his car has exhibited acceleration problems. Customer further claims that when he is at a stop and tries to accelerate the vehicle lurches forward. Customer claims that the lurching occurs when the vehicle is at a full stop.
3971	TUNDRA	2000	1/27/2010	Customer emailed regarding his 2000 Toyota Tundra SR5 (V8) 4x4. Specifically, customer claims that on unknown dates his vehicle has exhibited electronic throttle problems. Customer further claims that the throttle has gotten stuck and did not respond until pedal was at half throttle.
3972	MATRIX	2008	1/27/2010	Customer called regarding his 2008 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, the vehicle jumped forward, causing him to have an accident. Customer further claims that he attempted to apply the brakes, but the vehicle kept going. Customer claims that he released the gas pedal but the vehicle accelerated and kept gaining momentum, rolling over into a ditch. Customer claims that the lurching had occurred in the past when the vehicle was stopped.
3973	HIGHLANDER	2010	1/27/2010	Customer called regarding her 2010 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle jumped forward for a second when she was parked and that the RPM needle was never at zero and that the brake pedal felt loose and moved from side to side.

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3974	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle's gas pedal got stuck and the vehicle lurched forward while her son was driving.
3975	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on May 17, 2009 the vehicle suddenly accelerated on its own and wouldn't stop when she put her foot on the brake, causing the vehicle to go over a cement parking block and into a tree.
3976	CAMRY	2005	1/27/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, he experienced unintended acceleration.
3977	IS250	2009	1/27/2010	Customer called regarding his 2009 Lexus IS 250. Specifically, customer claims that on unknown dates, she experienced unintended acceleration.
3978	TUNDRA	2007	1/27/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when she accelerates from a stop she feels as if the engine surges and that this feeling lasts for approximately three to five seconds. Customer further claims that this has happened while she is driving the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3979	RAV 4	2008	1/27/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck and the vehicle accelerated, causing her to hit the vehicle in front of her. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
3980	AVALON	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon XL. Specifically, customer claims that on an unknown date, her vehicle accelerated while driving. A Field Technical Specialist inspected the vehicle.
3981	SEQUOIA	2007	1/27/2010	Customer called regarding his 2007 Toyota Sequoia. Specifically, customer claims that on unknown dates his vehicle has had repeated acceleration concerns.
3982	RAV 4	2009	1/27/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated but failed to specify a specific date. It is unknown if FTS inspected the vehicle. It is unknown if the vehicle was in motion at the time of the sudden acceleration.
3983	COROLLA	2008	1/27/2010	Customer called regarding his 2008 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle would not stop when his son was approaching a red light, causing his son to run into the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3984	AVALON	2005	1/27/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on January 13, 2009 the vehicle surged forward while she was pulling into a parking space at less than 3 mph. Customer further claims that she hit the brake but that the vehicle ran into a steel post at the end of the parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3985	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she has experienced hesitation with the gas pedal, and she states that she has removed floor mats from the vehicle.
3986	RAV 4	2009	1/27/2010	Customer's daughter called regarding customer's 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle experienced a sticking gas pedal.
3987	AVALON	2007	1/27/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on November 18, 2009 the vehicle suddenly flew backwards into another vehicle while she was backing out of a parking space. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3988	CAMRY	2007	1/27/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates there was a hesitation when starting the vehicle from a stop.
3989	4RUNNER LIMITED	2001	1/27/2010	Customer called regarding her 2001 Toyota 4Runner. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while in cruise control. Customer claims that the sudden acceleration occurred while the vehicle was already in motin.
3990	SEQUOIA	2008	1/27/2010	Customer called regarding his 2008 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle intermittently surged forward when he applied the accelerator from a stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
3991	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle surged from time to time.
3992	RAV 4	2008	1/27/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck and she had to pull over.

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3993	COROLLA	2009	1/27/2010	Customer emailed regarding her 2009 Toyota Corolla. Specifically, customer claims that on three unknown dates the vehicle accelerated on its own and continued to accelerate even though she pressed the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3994	COROLLA	2010	1/27/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that in November 2009 the vehicle accelerated and shot forward while she was going into a parking space without her foot on the gas, causing her to run into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
3995	CAMRY	2008	1/27/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle kept going and did not seem to want to stop when she braked.
3996	CAMRY	2005	1/27/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on an unknown date, his mother was involved in unintended acceleration.
3997	CAMRY	2010	1/27/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle went forward on its own. Customer further claims that the movement was subtle.
3998	RAV 4	2010	1/27/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on December 1, 2009 the vehicle accelerated on its own when she was backing into her garage. Customer further claims that she is unsure if she accidentally pressed the pedal or if the vehicle accelerated on its own.
3999	SCION tC	2008	1/27/2010	Customer called regarding his 2008 Scion TC. Specifically, customer claims that on unknown dates his brake pedal or gas pedal got stuck. Customer further claims that vehicle has failed to stop when he presses the brake.
4000	AVALON	2008	1/27/2010	Customer's wife called regarding customer's 2008 Toyota Avalon. Specifically, customer claims that on January 24, 2010 he was driving on the highway and trying to change lanes when the vehicle accelerated and sped across four lanes of traffic and ran into the barriers on the side of the road. Customer further claims that the vehicle then jerked back onto the highway and spun into oncoming traffic and into a ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4001	CAMRY	2009	1/27/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she experienced unintended acceleration when she had her vehicle in reverse. Customer further claims that some times the car felt as though it was stuck on a low gear and then she felt it shift.
4002	CAMRY	2004	1/27/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on December 16, 2007, she was involved in an accident caused by unintended acceleration. Customer further claims that she was in an underground parking garage and was attempting to park when the vehicle accelerated forward, running through an island and into another vehicle. Customer claims that a passenger was injured in the incident.
4003	COROLLA	2008	1/27/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on November 22, 2009, she approached a stop sign but the brakes did not respond, resulting in a collision. Customer further claims the brakes have not responded three other times.
4004	TACOMA	2007	1/27/2010	Customer called regarding 2007 Toyota Tacoma Prerunner L/B. Specifically, customer claims that on August 26, 2008 when the vehicle was at a complete stop, it surged forward and hit a vehicle in front of it. Customer further claims that the speed before impact was five to ten miles per hour. Customer states that the floor mat was on its hooks and was not touching either the gas or the brake pedal. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
4005	CAMRY	2002	1/27/2010	Customer called regarding both of his 2002 Camry LEs. Specifically, customer claims that on unknown dates both vehicles exhibited unintended acceleration.
4006	CAMRY	2007	1/27/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 25, 2010, he was turning into his driveway and applied the brakes, and the vehicle surged forward and hit the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4007	COROLLA	2005	1/27/2010	Customer called regarding her 2005 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle lurched forward and the gas pedal got stuck at times.

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4008	CAMRY	2007	1/27/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 21, 2010, she was stopped at a yield sign and when she moved forward into the lane, the vehicle jerked and was sideswiped by another vehicle. Customer's vehicle flipped over but the airbags did not deploy. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4009	CAMRY	2008	1/27/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that vehicle made loud sounds when braking. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4010	COROLLA	2009	1/27/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that in November 2008 the vehicle suddenly accelerated on its own and the accelerator pedal got stuck when he was driving on the highway at 50 mph, causing him to run into two vehicles. Customer further claims that in October 2009 the vehicle accelerated on its own as he was coming to a stop from a speed of 35 mph, causing him to run into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4011	AVALON	2008	1/27/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on unknown dates she experienced problems with the accelerator and that the vehicle was jumping and lurching.
4012	CAMRY	2004	1/27/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that in August 2009 he was in an accident caused by sudden acceleration. Customer further claims that he was in a parking lot when the vehicle's gas pedal became stuck, causing the vehicle to take off. Customer states that he attempted to put on the brakes, but that the vehicle would not stop. Customer claims that he hit a parked vehicle and a building during the incident. Customer states that he also experienced unintended acceleration in that when the vehicle's speed reached approximately 40 or 50 miles per hour, the vehicle seemed to accelerate by itself. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4013	RAV4	2007	1/27/2010	Customer called regarding her daughters' 2007 Toyota RAV4. Specifically, customer claims that on unknown dates, her daughters experienced pedal issues.
4014	AVALON	2008	1/27/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle suddenly lurched forward when she was driving up a hill. Customer further claims that her husband has experienced similar issues. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4015	CAMRY	2005	1/27/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on an unknown date, he experienced unintended acceleration. Customer claims that his pedal stuck and he hit a tree.
4016	LS 400	1999	1/27/2010	Customer called regarding his 1999 Lexus LS 400. Specifically, customer claims that on an unknown date in November 2009, while his wife was driving the vehicle, it accelerated unintentionally and caused her to hit a cement wall.
4017	AVALON	2005	1/27/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle jumped when she went to take her foot off of the brake without touching the accelerator pedal.
4018	CAMRY	2005	1/27/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, he experienced accelerator concerns. Customer claims that on one occasion, he had an accident. Customer claims that while behind a truck, he took his foot off the brake and the vehicle accelerated and he hit the truck.
4019	COROLLA	2007	1/27/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that in August 2009 the vehicle's accelerator pedal got stuck. Customer further claims that she put the vehicle in neutral and it stopped.
4020	CAMRY	2010	1/27/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle sped up when she was driving on the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4021	CAMRY	2010	1/27/2010	Insurance agent called regarding customer's 2010 Toyota Camry SE. Specifically, customer claims that in December 2009, She was in the Costco parking lot and her vehicle was sticking out a bit after she parked. She got back into vehicle to move it forward. She turned the key in the ignition, with her foot lightly on the brake, and vehicle surged forward when she shifted it into drive. She ran into another vehicle that was parked 3 ft in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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4022	RAV 4	2008	1/27/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on more than one occasion, on unknown dates, her vehicle would not shift downward as she was coming to a stop and the RPMs were high.
4023	Avalon	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date, the vehicle accelerated, causing him to have an accident.
4024	CAMRY	2010	1/27/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, the vehicle surged.
4025	AVALON	2007	1/27/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date, the car accelerated, causing him to have an accident. Customer further claims that he had his foot on the brake, but the vehicle kept moving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4026	RAV 4	2010	1/27/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated but failed to specify a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4027	CAMRY	2008	1/27/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle started to race when using cruise control.
4028	MATRIX	2010	1/27/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, the customer claims that on 8/21/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4029	CAMRY	2003	1/27/2010	Customer called regarding his 2003 Toyota Camry LE. Specifically, customer claims that on an unknown date in 2008, the vehicle accelerated and crashed into a building.
4030	RAV 4	2009	1/27/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle jumped at times and he did not like the feel of the accelerator pedal.
4031	GS 300	1999	1/27/2010	Customer called regarding his 1999 Lexus GS 300. Specifically, customer claims that on unknown dates vehicle lurched both forward and backward and revved at high rpm.
4032	IS250	2008	1/27/2010	Customer called regarding her 2008 Lexus IS 250. Specifically, customer claims that on an unknown date the vehicle accelerated to 80 mph and the tachometer was at 8 (8000 RPM). Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4033	CAMRY	2010	1/27/2010	Customer's mother called regarding customer's 2010 Toyota Camry. Specifically, customer claims that on an unknown date, he tried to brake but the vehicle kept moving, causing him to hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4034	4RUNNER	2006	1/27/2010	Customer called regarding his 2006 Toyota 4Runner. Specifically, customer claims that on January 12, 2010, the vehicle accelerated.
4035	COROLLA	2009	1/27/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle started accelerating by itself. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4036	CAMRY	2005	1/28/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, she has had her pedal stick and she thinks it should be part of the recall.
4037	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates in the mornings, his vehicle had a high idle.
4038	CAMRY	2005	1/28/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on January 27, 2010, her pedal became stuck causing her to rear-end another vehicle. Customer claims that this occurred on three occasions.
4039	COROLLA	2010	1/28/2010	Customer's daughter called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on unknown date she experienced acceleration problem.
4040	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she experienced unintended acceleration. Customer further claims that on an unknown date she tried to press the accelerator but the vehicle did not accelerate.
4041	COROLLA	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on December 14, 2009, vehicle was in a rollover accident.
4042	CAMRY	2008	1/28/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on October 31, 2009, his son was driving when vehicle was rapidly accelerated. Customer further states that the sudden acceleration has repeated. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4043	TUNDRA	2005	1/28/2010	Customer called regarding his 2005 Toyota Tundra. Specifically, customer claims that, on unknown dates, the vehicle experienced accelerator problems. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4044	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date her grandmother was driving the car and coming to a red light, but the vehicle just kept accelerating forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4045	CAMRY	2006	1/28/2010	Customer called regarding her 2006 Toyota Camry. Specifically, customer claims that on unknown dates the accelerator pedal got stuck.
4046	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has been experiencing unintended acceleration. Customer further claims that he will drive and notice "instant" unintended acceleration. Customer states that this problem began concerning him approximately one month ago, and states that the issue happens "randomly." Customer claims that the sudden acceleration occurs wil the vehicle is already in motion.
4047	RAV 4	2007	1/28/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she applied the brakes, although the vehicle went forward into the intersection.
4048	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that on January 17, 2010 her vehicle suddenly surged/lurched forward, causing her to crash into a brick wall. Customer further claims that at the time of the accident she was traveling at 5 mph. Customer claims that this sudden acceleration occurred while the vehicle was already in motion.
4049	ES 330	2006	1/28/2010	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on unknown date in January 2010 her vehicle lunged forward while parking into a parking stall.
4050	AVALON	2006	1/28/2010	Customer's wife called regarding customer's 2006 Toyota Avalon. Specifically, customer's wife claims that in December 2009 the vehicle accelerated suddenly and jumped the curb while she was pulling into a parking spot, causing her to run into a handicap pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4051	RAV 4	2010	1/28/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle idles high but failed to specify a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the high idle occurs when at a complete stop.
4052	HIGHLANDER	2009	1/28/2010	Customer called regarding her 2009 Toyota Highlander. Specifically, customer claims that on an unknown date her vehicle would accelerate as she pressed on the brake.
4053	RAV 4	2010	1/28/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle accelerated after she only lightly pressed on the gas, and that the vehicle's RPM increased from 1000-2000 to 3000 when passing a toll and driving 5 mph. Customer further claims that the vehicle does not slow down when she sought to decelerate while driving at 50 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4054	HIGHLANDER	2004	1/28/2010	Customer called regarding her 2004 Toyota Highlander. Specifically, customer claims that on on unknown dates her gas pedal got stuck.
4055	CAMRY	2007	1/28/2010	Customer called regarding 2007 Toyota Camry. Specifically, customer claims that he needs a new vehicle because he has had acceleration issues since the vehicle was new. The particulars of the underlying incidents are unclear.
4056	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has not experienced concerns with the accelerator pedal, but would like to know if his vehicle is involved in the pedal and airbag recall. Custoemr further claims that he has experienced that the vehicle is slow to take off when he presses the gas pedal, but that when the vehicle is at a certain speed, it accelerates forward. Customer states that this happens every time he drives. Customer claim that the sudden acceleration occurs while the vehicle is already in motion.
4057	HIGHLANDER	2008	1/28/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on 1/00/2010, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4058	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 4, 2010, she was in an accident caused by unintended acceleration. Customer claims that while she was driving, the vehicle accelerated and customer was unable to stop the vehicle in time before hitting another vehicle. Customer states that her speed at impact was approximately 25 miles per hour. Customer states that she applied the brakes, but that they did not "catch." Customer states that she was not able to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4059	CAMRY	2010	1/28/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, the vehicle hesitated and then surged.
4060	CAMRY	2008	1/28/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on May 11, 2009, he was making a turn and applied the brakes to slow down, but the vehicle continued to accelerate, causing him to hit the buard rails. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4061	COROLLA	2010	1/28/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown date she had a problem with the vehicle accelerating.
4062	COROLLA	2007	1/28/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on January 27, 2010 the vehicle continued to accelerate after she lifted her foot off of the accelerator.
4063	LS 430	2004	1/28/2010	Customer called regarding her 2004 Lexus LS 430. Specifically, customer claims that on unknown dates her vehicle has unexpectedly accelerated.
4064	TUNDRA	2008	1/28/2010	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that when he drives at approximately 65 miles per hour and applies the brakes, the vehicle starts bouncing or jumping and pulling left or right.
4065	TUNDRA	2006	1/28/2010	Customer called regarding his 2006 Toyota Tundra. Specifically, customer claims that on 11 unknown dates his vehicle has accelerated while he was trying to park. Customer further claims that his wife also has almost run into a building because of the acceleration. Customer further claims that in October 2009 he hit a wall when the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4066	Avalon	2008	1/28/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on two unknown dates, her gas pedal got stuck.
4067	TACOMA	2005	1/28/2010	Customer called regarding his 2005 Toyota Tacoma. Specifically, customer claims that on January 28, 2010 the vehicle surged, went off the road, and rolled over when he was on the road with his foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4068	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she had an issue with acceleration: when she accelerated from a stop, the vehicle would not move but goes to a high RPM.
4069	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] his vehicle surges forward. Customer further claims that he continues to have problems with the vehicle's accelerator and brake.
4070	CAMRY	2010	1/28/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4071	RAV 4	2008	1/28/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on unknown dates her vehicle continued to accelerate while she pressed the brake pedal.
4072	Camry	2007	1/28/2010	Customer's daughter called regarding customer's 2007 Toyota Camry. Specifically, customer claims that on an unknown date, customer was involved in a car accident due to the accelerator pedal.
4073	CAMRY	2005	1/28/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, he has been experiencing acceleration problems for approximately one year.
4074	IS 300	2002	1/28/2010	Customer called regarding his 2002 Lexus IS 300 SportCross. Specifically, customer claims that on unknown dates his vehicle has suddenly accelerated. Customer further claims that on one occasion his vehicle suddenly accelerated as he was pulling into a parking lot causing him to hit a hedge. Customer claims that the sudden acceleration occurred while vehicle was already in motion.
4075	RAV 4	2008	1/28/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that in March 2009 she was in an accident as she was pulling out of a garage because the vehicle jumped, revved, and took off as she was applying the brakes.
4076	COROLLA	2009	1/28/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle has a slow response when accelerating.
4077	CAMRY	2009	1/28/2010	Customer emailed regarding her 2009 Toyota Camry. Specifically, customer claims that on two unknown dates the vehicle took off. Customer further claims that on the first time the vehicle jumped the curb and went 50 feet, and the second time it just lunged and almost hit a light pole.

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4078	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving her vehicle at 60mph, the vehicle accelerated unintentionally; she was able to control the vehicle after placing it in neutral. Customer further claims that she has removed floor mats from the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4079	CAMRY	2006	1/28/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he experienced sudden acceleration when applying the brake.
4080	4RUNNER	2004	1/28/2010	Customer called regarding her 2004 Toyota 4Runner. Specifically, customer claims that on January 2, 2010 her vehicle accelerated and the pedal stuck, causing her to hit a parked car. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4081	COROLLA	2010	1/28/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he experienced unintended acceleration. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4082	GS 450h	2007	1/28/2010	Customer called regarding his 2007 Lexus GS 450h. Specifically, customer claims that on January 14, 2010 vehicle exhibited unintended acceleration, causing a multi-vehicle accident.
4083	RAV 4	2006	1/28/2010	Customer called regarding her 2006 Toyota RAV4. Specifically, customer claims that in August 2008 as she was pulling into the driveway, she applied the brake, but the vehicle accelerated, causing her to hit the gas station. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4084	HIGHLANDER	2006	1/28/2010	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle takes off without touching the accelerator.
4085	AVALON	2005	1/28/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on February 5, 2009, while driving 20-25 mph in heavy traffic, she noticed that the vehicle in front of her had stopped, but when she tried to stop, the brakes did not work.
4086	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle had an issue regarding unintended acceleration.
4087	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle will hesitate and then speed ahead as if it is on cruise control. Customer claims that this sudden acceleration occurred while the vehicle was already in motion.
4088	COROLLA	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates her vehicle accelerated and slowed down sometimes. Customer further claims that sometimes the acceleration snapped her neck backwards, and that the vehicle has moved while it was in park. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while it was already in motion.
4089	Corolla	2010	1/28/2010	Customer called regarding his rented 2010 Toyota Corolla. Specifically, customer claims that on an unknown date, his wife was driving the vehicle and had an accident due to the accelerator.
4090	COROLLA	2007	1/28/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated on its own.
4091	PRIUS	2005	1/28/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that in January 2010 the vehicle had a surge of acceleration while she was driving on the freeway, causing her to slightly bump the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4092	TUNDRA	2008	1/28/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle experienced a couple of instances of unintended accelerations while in parking lots.
4093	CAMRY	2008	1/28/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates he had been having an issue with his vehicle since last year.
4094	HIGHLANDER	2009	1/28/2010	Customer called regarding his 2009 Toyota Highlander Sport. Specifically, customer claims that on an unknown date he was backing out of a parking space and when he took his foot off the brake, the vehicle surged and hit a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4095	RAV 4	2010	1/28/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle has an accelerator issue. FTS did not inspect the vehicle. It is unknown if the issue occurs while the vehicle is moving.
4096	CAMRY	2002	1/28/2010	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle exhibited unintended acceleration while in motion, both forward and reverse, despite her foot applying the brakes.
4097	CAMRY	2003	1/28/2010	Customer called regarding her 2003 Toyota Camry LE. Specifically, customer claims that on unknown dates her vehicle has exhibited unintended acceleration.

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4098	CAMRY	2005	1/28/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that in fall of 2009, while parking, she stepped on the brake lightly and the engine revved and surged forward hitting the parked car in front. Customer claims that it was an isolated incident.
4099	RX 350	2010	1/28/2010	Customer called regarding his 2010 Lexus RX 350. Customer claims that on Jan 21, 2010, as he approached a stop light, he tried to brake but vehicle accelerated. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
4100	RAV 4	2004	1/28/2010	Customer called regarding his 2004 Toyota RAV4. Specifically, customer claims that his dad was driving the vehicle, and the accelerator pedal stuck, causing him to crash into some trees. Customer claims that the sudden acceleration occurred while the car was already in motion.
4101	HIGHLANDER	2010	1/28/2010	Customer called regarding her 2010 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4102	PRIUS	2004	1/28/2010	Customer called regarding his 2004 Toyota Prius. Specifically, customer claims that on unknown dates when he went over a bump the vehicle sped up but if he pressed firmly on the brake, the brakes responded. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4103	RAV 4	2009	1/28/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated but failed to specify a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4104	Camry	2008	1/28/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date, when he pressed on the accelerator to increase speed, he heard a click and the vehicle began to increase speed by itself. Customer further claims that he was able to gain control of the vehicle, but was very scared. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4105	CAMRY	2010	1/28/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on January 10, 2010, the vehicle launched forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4106	ES350	2008	1/28/2010	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on January 28, 2010, when she turned the vehicle on in the morning, while her vehicle was still in park, the rpm's revved up. Customer further claims that she experienced unwanted acceleration approximately one week prior.
4107	CAMRY	2002	1/28/2010	Customer Customer called regarding his 2002 Toyota Camry LE. Specifically, customer claims that in August 2003 his wife could not stop the vehicle and hit a building. Customer further claims that the vehicle continues to accelerate from time to time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4108	AVALON	2005	1/28/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on November 7, 2009 the vehicle accelerated onto a curb and ran into a mailbox when she released the brakes while driving at 10-15 mph. Customer further claims that the vehicle has had issues with a sticking pedal and increasing RPM at times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4109	SIENNA	2004	1/28/2010	Customer called regarding her 2004 Toyota Sienna. Specifically, customer claims that on an unknown date she received a speeding ticket for driving 86 mph and that she believes that an acceleration defect caused the speeding.
4110	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota camry. Specifically, customer claims that the vehicle has shown signs of acceleration in the past and seeks advice as to what to do. The details of the underlying incident(s) are unclear.
4111	COROLLA	2009	1/28/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that in November 2009, the vehicle was parked in front of the customer's garage when the customer went to put the vehicle into reverse and the vehicle started to speed away and collided with the garage door. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4112	LS 460L	2007	1/28/2010	Customer called regarding his 2007 Lexus LS 460L. Specifically, customer claims that on an unknown date his vehicle surged forward when he released the accelerator to pull into a parking spot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4113	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has been in accidents within the past year caused by unintended acceleration. Customer further claims that he has removed his floor mats. The details of the underlying incident(s) are unclear.

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4114	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that in December 2009, he was coming to a stop sign and attempted to slow down, but the vehicle kept going at the same speed. Customer further claims that he applied the brakes, but the car slid into the intersection and hit an electrical box. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4115	COROLLA	2010	1/28/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he was backing out of his garage when the vehicle suddenly accelerated on its own and hit the side of the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4116	RAV 4	2009	1/28/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle surged.
4117	RAV 4	2009	1/28/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle's gas pedal felt sticky at times and the vehicle seemed to lurch at other times.
4118	HIGHLANDER	2006	1/28/2010	Customer called regarding his 2006 Toyota Highlander. Specifically, customer claims that on January 22, 2010, his wife was driving and pulling into a parking space, when the vehicle suddenly accelerated, resulting in a collision. Customer further claims the vehicle continued to accelerate even after using the brakes and only stopped when she shifted into Park. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4119	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 23, 2010, his wife was driving the vehicle when she experienced unintended acceleration, which thereafter caused an accident when the vehicle ran off the highway and hit some bushes. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4120	AVALON	2007	1/28/2010	Customer emailed regarding his 2007 Toyota Avalon Limited. Specifically, customer claims that on unknown dates in 2008, he was experiencing periods of unassisted accelerations.
4121	CAMRY	2004	1/28/2010	Customer called regarding her 2004 Toyota Camry. Specifically, customer claims that on March 8, 2008, she was involved in an accident caused by the fact that the gas pedal became stuck. Customer further claims that she collided with a brick wall due to the problem, and that she experienced front-end damage as a result.
4122	TUNDRA	2007	1/28/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on November 2, 2009, his vehicle did not stop despite hitting the brake, causing him to hit another car. On January 27, 2010, customer claims that the vehicle accelerated unintentionally as he was stopped at a red light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion, in the first incident, and while the vehicle was at a full stop, in the second incident.
4123	RAV 4	2008	1/28/2010	Customer called regarding his 2008 Toyota RAV4. Specifically, customer claims on that on four occasions, dates unknown, his vehicle continued driving as he applied the brakes.
4124	COROLLA	2007	1/28/2010	Customer called regarding her 2007 Toyota Corolla. Specifically, customer claims that in December 2009 the vehicle experienced unintended acceleration while she was going into a driveway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4125	SCION XD	2008	1/28/2010	Customer called regarding his 2008 Toyota Scion XD. Specifically, customer claims that on 3 or 4 occasions, his vehicle has accelerated as he takes his foot off the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4126	CAMRY	2004	1/28/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date his wife was pulling into the driveway in the vehicle when the vehicle suddenly accelerated. Customer states that although she had her foot on the brake, the vehicle continued to accelerate on its own. Customer claims that as a result, his wife crashed into their lawn furniture and shed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4127	AVALON	2006	1/28/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that she would like more information.
4128	HIGHLANDER	2007	1/28/2010	Customer called regarding his 2007 Toyota Highlander. Specifically, customer claims that on unknown dates the vehicle experienced a sticking gas pedal.
4129	TUNDRA	2010	1/28/2010	Customer called regarding 2010 Toyota Tundra 4X4. Specifically, customer claims that the vehicle jumped forward and hit a light pole.
4130	RAV 4	2007	1/28/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the accelerator pedal stuck.

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4131	ES 330	2006	1/28/2010	Customer called regarding her 2006 Lexus ES 330. Specifically, customer claims that on an unknown date the pedal has hooked on the floor mat.
4132	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date when he started the engine, the engine started roaring over 4500 RPM. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4133	SEQUOIA	2008	1/28/2010	Customer called regarding his 2008 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle jerked when he put his foot on the accelerator pedal.
4134	AVALON	2006	1/28/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on unknown dates, she experienced unintended acceleration while driving up hill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4135	TUNDRA	2010	1/28/2010	Customer called regarding his 2010 Toyota Tundra 4x2. Specifically, customer claims that on November 26, 2009 the vehicle was involved in an accident due to unintended acceleration. Customer further claims that he was on an exit ramp travelling 25 to 30 mph, and that the vehicle would not stop as he was attempting to slow down and turn left. Customer claims that he had both feet on the brake pedal but the vehicle would not stop, and that it ran into a stop sign. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4136	CAMRY	2010	1/28/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date, the RPMs rev up and down.
4137	ES350	2008	1/28/2010	Customer called regarding 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, she experienced unintended acceleration. Customer claims that the vehicle lunged over a curb, or divider. Customer claims that the vehicle continued to rev and run until she shut the vehicle off. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4138	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 26, 2010, he was in an accident in which he hit another vehicle. Customer further claims that he was pulling into a parking space when the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4139	CAMRY	2002	1/28/2010	Customer called regarding her 2002 Toyota Camry LE. Specifically, customer claims that on two occasions the vehicle has accelerated on its own as she was coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4140	TUNDRA	2007	1/28/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle's transmission seemed to accelerate while he was at a stop sign with his foot on the brake. Customer further claims that if his foot was not on the brake, the vehicle would move forward. Customer claims that the concern has been getting more frequent and severe.
4141	AVALON	2007	1/28/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle had hesitation problems, sticking problems with the pedal, and extra lurching when driving.
4142	SIENNA	2007	1/28/2010	Customer called regarding her 2007 Toyota Sienna. Specifically, customer claims, on unknown dates, she was driving and the vehicle suddenly accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4143	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced unintended acceleration. The details of the alleged underlying incident are unclear.
4144	YARIS	2008	1/28/2010	Customer called regarding her 2008 Toyota Yaris. Customer claims, on unknown dates, she was driving and gas pedal interfered with itself. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4145	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle's accelerator felt sticky and required extra pressure to push it down. Customer further claims that once the extra pressure was applied, the vehicle suddenly took off.
4146	RAV 4	2005	1/28/2010	Customer called regarding his 2005 Toyota RAV4. Specifically, customer claims that on an unknown date his son was driving the vehicle and the accelerator pedal stuck. Customer further claims that the vehicle accelerated like the engine was ready to blow. Customer claims that the sudden acceleration occurred while the car was already in motion.

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4147	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle will abruptly snap or jerk when she is pulling out of the driveway. Customer further claims that sometimes the vehicles surges. Customer further claims that these incidents occur while the vehicle was already in motion.
4148	SEQUOIA	2007	1/28/2010	Customer called regarding his 2007 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle surged when his foot is on the brake.
4149	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that she has been experiencing issues with her vehicle acceleration since last year--when she tries to slow down, the vehicle seems to accelerate instead.
4150	Camry	2009	1/28/2010	Customer called regarding her Toyota vehicle. Specifically, customer claims that on an unknown date, she had issues with her gas pedal while she was at a stop sign. Customer further claims that the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4151	COROLLA	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that in December 2009 she was leaving a parking garage when the vehicle suddenly accelerated, and she hit the curb while trying to avoid impact. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4152	TACOMA	2006	1/28/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates but did not specify a date. FTS did not inspect the vehicle. It is unknown if the vehicle was already in motion at the time of the claimed sudden acceleration.
4153	CAMRY	2004	1/28/2010	Customer wrote regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date there was a shaking inside of his dash board when the temperature changed. Customer further claims that when he came to a stop and pressed the gas pedal slowly, the vehicle sped up very fast and he had to press on the brakes to stop. Customer claims that this condition was intermittent.
4154	SEQUOIA	2008	1/28/2010	Customer called regarding her 2008 Toyota Sequoia. Specifically, customer claims that on unknown dates the vehicle jumped like a bunny rabbit and experienced unintended acceleration issues at least twice.
4155	CAMRY	2004	1/28/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on an unknown date his wife was driving the vehicle when she experienced unintended acceleration. The particulars of the underlying incident are unknown.
4156	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle jolted forward when her foot is on the gas and the vehicle sped up when using cruise control with her foot on the brake.
4157	HIGHLANDER	2005	1/28/2010	Customer called regarding her 2005 Toyota Highlander. Specifically, customer claims that on unknown dates, when driving at 45 mph or more the gas pedal would sink in on its own and in order to stop it she would have to press firmly on the brakes or shut off the engine. Customer further claims she was in an accident where she hit the vehicle in front of her, and thinks it may be due to the accelerator issue. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4158	TACOMA	2006	1/28/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims she is concerned about the vehicle, but fails to provide further information. FTS did not inspect the vehicle. It is unknown if the vehicle was already in motion at the time of the claimed sudden acceleration.
4159	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle accelerated very quickly. Customer further claims that the incident occurred while the vehicle was fully stopped at a stop sign as she was ready to take off.
4160	CAMRY	2004	1/28/2010	Customer called regarding his 2004 Toyota Camry. Specifically, customer claims that on January 16, 2010, when he was driving the vehicle at 50 miles per hour on the highway, he was unable to stop and went through an intersection, hitting crossing traffic. Customer further claims that the gas pedal stuck. Customer claims that the vehicle is a total loss.
4161	CAMRY	2010	1/28/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated quickly. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4162	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date his wife was driving and the vehicle accelerated on its own, causing her to hit a light pole. Customer further states that the engine continued to rev up after the vehicle hit the pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4163	AVALON	2005	1/28/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that starting approximately 7-8 months prior to January 28, 2010, she noticed that her vehicle sometimes accelerates on the freeway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4164	RAV 4	2009	1/28/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle leapt ahead and felt like it accelerated by itself.
4165	4RUNNER	2005	1/28/2010	Customer called regarding her 2005 Toyota 4Runner. Specifically, customer claims that on unknown dates her accelerator pedal had been sticking since 2008, and that it usually happened when the weather was cold. Customer further claims that the RPMs stayed up.
4166	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced two incidents of unintended acceleration. Customer further claims that the first instance occurred a week after she purchased the vehicle: her husband was behind the wheel and backing out of the garage, and when he put the vehicle in park the engine began to race. Customer further claims the second instance occurred in September 2009: she was parking when suddenly the vehicle accelerated and hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4167	CAMRY	2005	1/28/2010	Customer called regarding her 2005 Toyota Camry. Specifically, customer claims that on unknown dates, her vehicle's accelerator pedal has become stuck. Customer claims that this has occurred more than once. On one occasion, customer claims, that while driving down the expressway, he came to a red light, and the vehicle accelerated, and the brakes almost did not stop the vehicle.
4168	4RUNNER	2006	1/28/2010	Customer called regarding her 2006 Toyota 4Runner. Specifically, customer claims that on unknown dates she has experienced unintended acceleration in the vehicle. Customer further claims that on one occasion, she went to pass another vehicle and pressed on the accelerator when the vehicle took off very fast. Customer claims that she attempted to apply the brakes, but that the vehicle kept accelerating. Customer states that she was able to stop the vehicle by putting it into neutral. Customer claims that the floor mat was in the vehicle, but that it was not trapped under the gas pedal during the incident.
4169	CAMRY	2009	1/28/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle's accelerator got stuck and then the vehicle surged.
4170	RAV 4	2007	1/28/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date she was driving at 25 mph when accelerator pedal stuck and vehicle went forward on its own, causing her to hit a lower embankment. Customer claims that the sudden acceleration occurred while the car was already in motion.
4171	COROLLA	2008	1/28/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on October 10, 2008 and October 21, 2009, the vehicle was involved in two accidents which she believes were caused by the accelerator pedal.
4172	IS350	2006	1/28/2010	Customer called regarding her 2006 Lexus IS 350. Specifically, customer claims that on unknown dates, on two separate occasions in 2008, an unidentified incident occurred.
4173	CAMRY	2006	1/28/2010	Customer called regarding his 2006 Toyota Camry. Specifically, customer claims that on an unknown date he had an issue with a sticking pedal.
4174	TUNDRA	2007	1/28/2010	Customer called regarding her 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date her vehicle lunged when put into drive. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4175	CAMRY	2005	1/28/2010	Customer called regarding his 2005 Toyota Camry. Specifically, customer claims that on unknown dates, he had an acceleration concern. Customer claims that his vehicle starts to jerk forward and when he hits the brake, the vehicle moves forward. Customer claims that this usually occurs when the vehicle is in the stop position. Customer further claims that this condition happens once a month.
4176	RAV 4	2007	1/28/2010	Customer called regarding her 2007 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4177	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 22, 2010, she experienced unintended acceleration as she made a right turn in the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4178	SC 430	2002	1/28/2010	Customer called regarding her 2002 Lexus SC 430. Specifically, customer claims that on unknown dates her vehicle exhibited acceleration problems. An FTS inspected the vehicle.

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4179	TUNDRA	2006	1/28/2010	Customer called regarding her 2006 Toyota Tundra. Specifically, customer claims that, on January 8, 2010, she was driving and gas pedal got stuck causing her to hit a tanker truck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4180	CAMRY	2010	1/28/2010	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer claims that on unknown dates when he stepped on the gas pedal it did not respond quickly. Customer further claims when he was coming to a stop the vehicle's idle was really high, and when he released the brake, the vehicle jumped forward and the engine was revving. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4181	COROLLA	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates while stopping the vehicle sometimes lurched forward.
4182	AVALON	2010	1/28/2010	Customer wrote regarding his 2010 Toyota Avalon. Specifically, customer claims that on unknown dates he noticed that when he approached an intersection or traffic light, his vehicle continued to accelerate. Customer further claims that he felt as if his vehicle lunged forward as he took his foot off the accelerator pedal to apply the brakes. Customer states that the sensation was as if the cruise control was engaged even though this was not the case. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4183	CAMRY	2010	1/28/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on January 29, 2010, her daughter was making a turn when the vehicle suddenly accelerated and would not stop until she turned the vehicle off and put on the parking brake.
4184	CAMRY	2007	1/28/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer requests whether her vehicle is involved in the sticky pedal recall. Customer further claims that she is having problems with her vehicle in that her vehicle is "knocking" and that her engine is accelerating. Further details are unclear.
4185	RAV 4	2008	1/28/2010	Customer called regarding her 2008 Toyota RAV4. Specifically, customer claims that on an unknown date the gas pedal got stuck and that she got into an accident.
4186	COROLLA	2008	1/28/2010	Customer called regarding her 2008 Toyota Corolla. Specifically, customer claims that on an unknown date she was approaching a crosswalk and pressed the brake, which slowed but did not stop the vehicle, resulting in a collision. Customer further claims she used to own a 2006 Toyota Corolla which also experienced a sticking gas pedal.
4187	CAMRY	2009	1/28/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on January 28, 2010, he was driving 25 mph and attempted to brake, but the vehicle picked up speed. Customer further claims that as a result of the acceleration, he hit a curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4188	AVALON	2007	1/28/2010	Customer called and emailed regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle revved when starting to accelerate and then jerked.
4189	CAMRY	2003	1/28/2010	Customer's daughter called regarding her father's 2003 Toyota Camry LE. Specifically, customer's daughter claims that the vehicle's gas pedal got stuck and caused the vehicle to go through a stop sign and red light and hit a pole. Customer's daughter claims that the sudden acceleration occurred while vehicle was already in motion.
4190	Tacoma	2008	1/28/2010	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on unknown dates, he experienced sudden acceleration. Customer further claims that this happened when the vehicle was in "drive" and his foot was on the brake.
4191	MATRIX	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates the vehicle jerked when she applied the brakes.
4192	CAMRY	2010	1/28/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that in December 2009, she had an accident, but is not aware of how it happened.
4193	COROLLA	2010	1/28/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he experienced sudden acceleration.
4194	MATRIX	2009	1/28/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that in December 2009 the vehicle accelerated on its own. Customer further claims that acceleration occurred again in January. Customer further claims that the center console lid was broken.
4195	AVALON	2005	1/28/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates she experienced acceleration concerns.

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4196	CAMRY	2007	1/28/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 20, 2010, his son was driving the vehicle and coming to a stop sign when the car failed to stop, running the stop sign and accelerating into a tree. Customer claims that estimated speed at impact was 40 to 45 miles per hour. Customer states that front end of vehicle was damaged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4197	TACOMA	2006	1/29/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, which caused an accident on 11/9/2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4198	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates her vehicle lurched forward after the gas pedal was pressed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4199	TUNDRA	2007	1/29/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle accelerated on its own while he was driving.
4200	AVALON	2006	1/29/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on unknown dates, she noticed that it felt like her vehicle was driving when she was not pressing on the brakes. Customer further claims she experienced the brakes making a strange noise while slowing down.
4201	CAMRY	2010	1/29/2010	Customer's girlfriend called regarding customer's 2010 Toyota Camry LE. Specifically, customer's girlfriend claims that on an unknown date, she was coming out of a parking lot when suddenly the vehicle jumped and accelerated. Customer further claims that when he took his foot off the gas the vehicle took a while to slow down. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
4202	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 1/22/2010, as she was backing out of the driveway, the vehicle took off, causing her to hit a tree that had previously fallen. Customer further claims that she tried to brake during the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4203	CAMRY	2009	1/29/2010	Customer's daughter called regarding customer's 2009 Toyota Camry. Specifically, customer claims that on unknown dates he experienced the vehicle unintentionally accelerating.
4204	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry Hybrid. Specifically, customer claims that on 2/1/10 he was driving on the expressway in heavy traffic when the vehicle surged, resulting in an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4205	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry Hybrid. Specifically, customer claims that on 2/1/10 he was driving on the expressway in heavy traffic when the vehicle surged, resulting in an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4206	ES350	2009	1/29/2010	Customer called regarding her 2009 Lexus ES 350.
4207	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on January 26, 2010 the vehicle unintentionally jumped forward into a wall when she lightly pressed the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4208	HIGHLANDER	2010	1/29/2010	Customer called regarding her 2010 Toyota Highlander Ltd. Specifically, customer claims that on an unknown date she was backing up and the vehicle would not move until she pressed the accelerator very hard, and then it jerked and jumped back. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4209	TUNDRA	2007	1/29/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle experienced two instances of acceleration problems. Customer further claims that the dealer repaired the vehicle and that he has no complaints with the vehicle. Customer claims that he was unhappy with the service department.
4210	CAMRY	2008	1/29/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates his vehicle accelerated before it slowed down when his foot is on the brake.

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4211	AVALON	2008	1/29/2010	Customer called regarding his 2008 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, he almost drove through his garage door because the vehicle accelerated. Customer further claims that he was accused of stepping on the gas instead of the brakes by his neighbors. This call was to document his concern about the acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4212	AVALON	2010	1/29/2010	Customer called regarding his 2010 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged when his wife applied the brakes.
4213	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates he has to press the gas pedal really hard for the vehicle to accelerate, then it accelerates and jerks with a loud sound. Customer further claims his steering has locked 3 times. Customer claims his concern about the accelerator pedal started 4-5 months before the media release. The Case Manager advised the sticky pedal is a wear issue; repairs were made to the vehicle and customer claims no further issue. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4214	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on two occasions, dates unknown, his vehicle unintentionally accelerated.
4215	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated.
4216	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that on January 25, 2010 the vehicle suddenly took off as his daughter was backing out of the driveway, causing her to crash into a concrete pole. w Customer further claims that the vehicles bumper was damaged. Customer alleges that the incident occurred while the vehicle was already in motion.
4217	TUNDRA	2008	1/29/2010	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that on January 12, 2010 when his wife was driving the car and applied the brake, the truck lurched forward and rear ended another vehicle. Customer claims that the engine revved. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
4218	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on two occasions, dates unknown, his vehicle unintentionally accelerated.
4219	RAV 4	2009	1/29/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle jerked and then slowed down when she pressed the accelerator pedal.
4220	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 1/28/2010 his wife was parking the vehicle when it raced and jumped over a concrete curb.
4221	TACOMA	2007	1/29/2010	Customer called regarding her 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on January 9, 2010 the vehicle just took off as she was making a turn while leaving her home. Customer further claims that she tried to hit the brakes, and drove off the road and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4222	TUNDRA	2008	1/29/2010	Customer called regarding her 2008 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle accelerated unintentionally. Customer further claims that her entire family is afraid of the vehicle.
4223	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on an unknown date, she the vehicle lunged forward.
4224	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on five or six occasions, dates unknown, vehicle accelerated by itself when applying or letting off the brakes.
4225	PRIUS	2009	1/29/2010	Customer called regarding his 2009 Toyota Prius. Specifically, the customer claims that on 5/19/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4226	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on more than one occasion, dates unknown, she experienced unintended acceleration on her vehicle.
4227	COROLLA	2010	1/29/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that she has been having issues with the vehicle and is scared to drive it.

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4228	RAV 4	2009	1/29/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle lunged forward and the engine accelerated when she put it in drive after backing out. Customer further claims that she had to put the vehicle in neutral. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4229	PRIUS	2008	1/29/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 12/26/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4230	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date he was approaching a stop light at approximately 20-30 mph; he applied the brake but the vehicle continued to move. Customer put the vehicle in neutral and removed the key. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4231	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced unintended acceleration four times since she purchased the vehicle. Customer further claims that the vehicle was not responsive to the brakes, and that when it did respond, it would not accelerate. Customer further claims that this occurred about twice a week, and happened more often when she was driving downhill.
4232	MATRIX	2010	1/29/2010	Customer called regarding his 2010 Toyota Corolla Matrix. Specifically, customer claims that on January 26, 2010, he was approaching a stop sign and put his foot on the brake, but the brakes did not work and the RPMs were racing. Customer further claims that the vehicle went up on a high curb and hit the stop sign post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4233	ES350	2007	1/29/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on January 28, 2010 the vehicle was involved in an accident. Customer further claims that in December 2009 the vehicle was involved in an accident. An FTS inspected the vehicle after the first accident.
4234	COROLLA	2010	1/29/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she was pulling slowly into a parking spot when the vehicle surged forward and was stopped by a big bush. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4235	COROLLA	2010	1/29/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on December 27, 2009, she was driving out of a parking lot and applied the brakes when another vehicle was coming, but her vehicle kept moving and collided with the other vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4236	COROLLA	2010	1/29/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on December 18, 2009, she stepped on the brakes and had the pedal all the way down but the vehicle continued accelerating by itself and hit a boulder. Customer further claims that on unknown dates the vehicle felt like it accelerated on its own like it was in cruise control mode all the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4237	TUNDRA	2007	1/29/2010	Customer called regarding her 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle experienced unwanted acceleration. Customer further claims that she thought it was the floor mats, but that after removing them the vehicle continued to accelerate.
4238	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle revved up while driving at a slow speed.
4239	PRIUS	2009	1/29/2010	Customer called regarding his 2009 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4240	CAMRY	2007	1/29/2010	Customer's son-in-law called on her behalf regarding her 2007 Toyota Camry. Specifically, son-in-law claims that the vehicle accelerated more than it should have when customer put vehicle in reverse and hit a mail box.
4241	RAV 4	2009	1/29/2010	Customer emailed regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle jumped when accelerating into a turn or starting off. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.

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4242	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle took off after the light changed green while at a stop light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4243	RAV 4	2009	1/29/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, which caused an accident on any unspecified date. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4244	TACOMA	2005	1/29/2010	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. FTS did not inspect the vehicle. It is unknown if the claimed sudden acceleration occurs while the vehicle is already in motion.
4245	AVALON	2007	1/29/2010	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on January 27 [year unknown], the customer was involved in an accident that he believes was caused by an accelerating pedal. Customer describes the incident as a surging forward, fish tail, zig zag, and then he crossed lanes and hit another vehicle. Customer further claims he complained to his dealer about a similar incident happening in 2009. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4246	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date his wife was driving and made a right turn, and he had to grab the wheel to avoid hitting a tree. Customer further states that on January 28, 2010, the vehicle again accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4247	CAMRY	2008	1/29/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on unknown date when moving forward from a stopped position his vehicle lurched forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4248	SEQUOIA	2008	1/29/2010	Customer called in regarding a 2008 Toyota Sequoia. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. FTS did not inspect the vehicle. It is unknown if the claimed sudden acceleration occurs while the vehicle is already in motion.
4249	ES350	2009	1/29/2010	Customer called regarding his 2009 Lexus ES 350. Specifically, customer claims that on an unknown date, he twice experienced the unintentional acceleration.
4250	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, she had experienced issues with the accelerator pedal on three occasions. Customer further claims that on one instance, she swerved into an ongoing traffic lane.
4251	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on 2/27/10 he was attempting to pass a vehicle starting at approximately 6-12 mph, when he changed lanes the vehicle launched forward resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4252	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, claims that on multiple occasions, dates unknown, she has had difficulty preventing the car from jumping forward while applying the brakes at a stop sign.
4253	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was driving down the highway and the vehicle seemed to take off even though the gas pedal was not pressed.
4254	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on January 28, 2010, she changed the gear from park to drive and the engine started racing and the vehicle was trying to lurch forward. Customer further claims that she had her foot on the brake the entire time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4255	CAMRY	2008	1/29/2010	Customer called regarding her 2008 Toyota Camry hybrid. Specifically, customer claims that on unknown dates the vehicle was having issues accelerating on its own.
4256	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 07/15/2008 her son was driving the vehicle when it accelerated on its own and crashed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4257	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on December 26, 2009, her accelerator pedal got stuck and her vehicle lunged forward when she was driving about 25 mph, causing her to rear end another vehicle and her vehicle to go into a ditch. Customer further claims her son heard the engine rev when it was in the ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4258	COROLLA	2010	1/29/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer wanted to know what vehicles were involved in the pedal recall.
4259	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on January 28, 2010, her vehicle experienced unintended acceleration three times while she was driving in a snow storm. Customer further claims that her vehicle surged forward and would not stop until she slammed on the brake and put the vehicle in neutral.
4260	RAV 4	2010	1/29/2010	Customer called regarding his 2010 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle surged forward and accelerated when his foot was on the brake.
4261	AVALON	2006	1/29/2010	Customer called regarding her 2006 Toyota Avalon Limited. Specifically, customer claims that on unknown dates, every once in a while, she gets a hesitation while accelerating. Customer claims that she is seeking an extended warranty. Customer claims that the incidents of sudden acceleration occurred while the vehicle was already in motion.
4262	COROLLA	2010	1/29/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the brake pedal felt like it was vibrating and the vehicle did not know whether it wanted to stop or go. Customer further claims that there was a burning smell from right over the right wheel.
4263	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date, the vehicle experienced hesitation issues.
4264	CAMRY	2010	1/29/2010	Customer's son-in-law called regarding customer's 2010 Toyota Camry XLE. Specifically, customer claims that in December 2009 her vehicle lunged while she was driving.
4265	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates when she drove the vehicle, she felt that the engine was accelerating. Customer further claims that the RPM was usually high -- somewhere in the middle --- when the vehicle was in park.
4266	AVALON	2008	1/29/2010	Customer called regarding her 2008 Toyota Avalon XLS. Specifically, customer claims that on January 23, 2010, while her vehicle was traveling 20 mph down the street, the vehicle in front of her suddenly stopped, he pressed the brakes but his vehicle would not stop. A time for inspection was set. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4267	CAMRY	2010	1/29/2010	Customer called regarding his 2010 Toyota Camry XLE. Specifically, customer claims that on an unknown date his accelerator pedal concern was slow to respond, and described it as jerking and stiff.
4268	PRIUS	2008	1/29/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 4/17/08, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4269	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry SE. Specifically, customer claims that on unknown dates when coming to a stop and braking, the vehicle felt like it was accelerating and the vehicle revved. Customer further claims that when she put her foot on the brake the vehicle rpms seemed to go higher. Customer further claims that there was a vibrating noise. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4270	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle surges when taking her foot off the gas pedal. Customer further claims that she has tried to repair the vehicle several times, but it still surges and is getting worse over time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4271	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 19, 2010, she was driving and tried to brake when traffic in front of her was stopping but vehicle did not stop and hit vehicle in front of her. Customer further claims that on an unknown date vehicle accelerated by itself when the vehicle was parked. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4272	COROLLA	2009	1/29/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that in October 2009 he was driving on the highway at about 65 mph when he applied the brakes, but the vehicle kept going, resulting in a collision. Customer further claims he thinks it may have been a problem with the gas pedal instead of the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4273	HIGHLANDER	2008	1/29/2010	Customer called regarding his 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4274	COROLLA	2009	1/29/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on January 29, 2010, he put the vehicle in reverse and the vehicle accelerated. He applied the brakes hard and put the vehicle in drive and the vehicle accelerated again. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4275	AVALON	2008	1/29/2010	Customer called regarding his 2008 Toyota Avalon XL. Specifically, customer claims that on January 14, 2010, while approaching a stop sign and applying the brakes, the vehicle accelerated on its own. Customer further claims that he tried to apply the brakes but the vehicle would not stop and it hit the car in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4276	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 12/15/2009 his vehicle accelerated while he was exiting the freeway and applying the brakes.
4277	COROLLA	2009	1/29/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on January 27, 2010, he was exiting the highway when the vehicle started speeding up and he could not stop it. He slowed it down by putting on the brake and emergency brake and smelled something burning. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4278	AVALON	2008	1/29/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on an unknown date she was driving about 30 mph when the vehicle surged. Customer put her foot on the brakes and stopped the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4279	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates she experienced problems with the vehicle accelerating. Customer further claims that on an unknown date, she was pulling into the garage and the vehicle jumped into acceleration. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
4280	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla XRS. Specifically, customer claims that on unknown dates when traveling over 70mph, she felt as if vehicle jumped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4281	TUNDRA	2007	1/29/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle accelerated unexpectedly from idle and ran into a pole. Customer further claims that his foot was not on the gas. Customer further claims that the vehicle cannot accelerate past 20 mph. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4282	VENZA	2009	1/29/2010	Customer called regarding 2009 Venza. Specifically, customer claims that vehicle sometimes speeds up on its own.
4283	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in April 2009 her sister was driving the vehicle and swerved to avoid a cat, but the vehicle accelerated and struck the curb.
4284	COROLLA	2009	1/29/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she experienced unintended acceleration.
4285	CAMRY	2007	1/29/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that in January and March 2009 she had two accidents. When the first accident occurred she was pulling into a parking space when the vehicle accelerated, causing her to run over the parking block. In the second accident, she was at a stop sign in a parking lot when her vehicle accelerated like dynamite, causing her vehicle to run over an embankment and onto the sidewalk. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while already in motion.
4286	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on unknown dates his vehicle accelerates more than it should when he puts the vehicle in motion at a green light.
4287	CAMRY	2010	1/29/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on various unknown dates the car hesitates when accelerating or braking.

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4288	CAMRY	2007	1/29/2010	Daughter called on customer's behalf regarding his 2007 Toyota Camry. Specifically, daughter claims that on 6/19/2009 customer was involved in a sever accident after his vehicle flew off the freeway. Daughter claims that father does not recall accident but she believes a sudden acceleration might have caused it.
4289	CAMRY	2010	1/29/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates his vehicle has experienced unintended acceleration. Customer further claims that when turning when using the cruise control the vehicle starts accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4290	CAMRY	2010	1/29/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on two unknown dates the vehicle experienced unintended acceleration. Customer did not indicate if the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4291	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date her mother was involved in a vehicle accident.
4292	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates twice she had to pump the brakes.
4293	ES350	2007	1/29/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates the vehicle surged forward and hit things several times. An FTS inspected the vehicle.
4294	HIGHLANDER	2008	1/29/2010	Customer called regarding his 2008 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4295	CAMRY	2007	1/29/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle unexpectedly accelerated twice while on cruise control.
4296	COROLLA	2009	1/29/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle had acceleration problems.
4297	TUNDRA	2010	1/29/2010	Customer called regarding his 2010 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle experienced pedal acceleration while pulling a trailer. Customer further claims that the pedal was not stuck. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4298	RAV 4	2009	1/29/2010	Customer called regarding his 2009 Toyota RAV4 Limited. Specifically, customer claims that on unknown dates when his wife slowly pressed the accelerator it was slow to return and the vehicle surged as it accelerated.
4299	CAMRY	2008	1/29/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date she had one accident where the vehicle surged and caused extensive damage.
4300	CAMRY	2009	1/29/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated and made him afraid to drive it.
4301	CAMRY	2009	1/29/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in Decem ber 2009, she was driving about 35 mph in the snow when the vehicle unintentionally accelerated to 45 mph. Customer further claims that she always has put two floor mats in the floor of her vehicle.
4302	MATRIX	2009	1/29/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on unknown dates the vehicle hesitated then jumped into gear.
4303	AVALON	2008	1/29/2010	Customer called regarding his 2008 Toyota Avalon Limited. Specifically, customer claims that on April 15, 2009, while his wife was pulling into a parking space, the vehicle accelerated into a wall. Customer claims his wife heard the rubber burn. Customer further claims he was have a recurring issue with this vehicle. A Field Technical Specialist was assigned to look into the concern. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4304	COROLLA	2010	1/29/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on January 27, 2010, he was pulling out of his garage when the vehicle accelerated and hit the garage of the house across the street and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4305	COROLLA	2010	1/29/2010	Customer called regarding his 2010 Toyota Corolla.
4306	CAMRY	2008	1/30/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle experienced unintended acceleration while in reverse.
4307	CAMRY	2008	1/30/2010	Customer claims that on her unknown date her son was driving her 2008 Toyota Camry LE when the vehicle suddenly surged forward. Customer claims that he was able to drive the vehicle to the side of the road and the pedal returned to its original position. Customer alleges that the incident ocured while the vehicle was already in motion.

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4308	COROLLA	2009	1/30/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date in 2008 his wife experienced a sudden acceleration while driving and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4309	RAV 4	2010	1/30/2010	Customer called in regarding a 2010 Toyota Rav4. No further information.
4310	CAMRY	2009	1/30/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on unknown dates when she accelerated her vehicle lurched. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4311	COROLLA	2009	1/30/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates her vehicle's RPM seemed to be higher than normal and that she had received two speeding tickets.
4312	CAMRY	2010	1/30/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on an unknown date, she was driving vehicle and vehicle started jumping and accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4313	COROLLA	2010	1/30/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she felt the vehicle accelerate on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4314	CAMRY	2007	1/30/2010	Customer's wife called regarding his 2007 Toyota Camry. No specifics of incident are provided.
4315	CAMRY	2010	1/30/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on an unknown date, she was driving vehicle and vehicle started jumping and accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4316	CAMRY	2009	1/30/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in November 2009, she was driving when she had to press the brakes and did so, but her car did not stop, causing her to run into the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4317	CAMRY	2008	1/30/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on January 8, 2010, she was pulling into a parking spot with her foot on the gas pedal, driving approx. 5-10 mph, when the vehicle accelerated more than it should have and hit another vehicle and a light post. Customer further claims that there was no driver floor mat in the vehicle at the time of the accident. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4318	COROLLA	2010	1/30/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the customer's mother had some incidents with the vehicle surging.
4319	HIGHLANDER	2008	1/30/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, customer claims that on January 26, 2010, she was parking her vehicle and lightly pressed on the gas pedal when the vehicle lurched forward and hit a dumpster. Customer further claims that she was able to control the vehicle by braking and putting the vehicle into neutral. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4320	TUNDRA	2007	1/30/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on January 28, 2010 the vehicle accelerated forward and the engine went full throttle when he applied the brake and he ran into another vehicle in front of him. Customer claims that he feels the accident was related to the cruise control. Customer further claims that approximately two weeks prior the vehicle experienced unintended acceleration and he had to stand on the brake to regain control of the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4321	CAMRY	2007	1/30/2010	Customer called regarding his 2007 Toyota Camry. Without providing specifics, customer claims that his vehicle has experienced unintended acceleration.
4322	CAMRY	2007	1/30/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle sometimes jumps forward from a full stop. Customer further claims that sometimes the vehicle shifts roughly. Customer alleges that these incidents occur while the vehicle is at a full stop.
4323	CAMRY	2007	1/30/2010	Customer called regarding her 2007 Toyota Camry LE (V6). Specifically, customer claims that on unknown dates she experienced unintended acceleration when she was going in reverse and then tapped the gas pedal. Customer further claims that the sudden acceleration caused her to fly across the street.
4324	CAMRY	2008	1/30/2010	Customer called regarding her 2008 Toyota Camry LE (V6). Specifically, customer claims that on January 28, 2009, the vehicle surged forward and hit another vehicle. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.

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4325	CAMRY	2009	1/30/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while parking the car in a parking lot, he put the vehicle in drive but the car started to roll back in reverse.
4326	TUNDRA	2008	1/30/2010	Customer called regarding her 2008 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle experienced three instances of unintended acceleration.
4327	ES350	2008	1/30/2010	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date, he was involved in an incident with unexpected acceleration.
4328	COROLLA	2010	1/30/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he experienced sudden acceleration while driving. He shifted into neutral and pulled over to the side of the road and hit the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4329	CAMRY	2007	1/30/2010	Customer's husband called regarding customer's 2007 Toyota Camry LE (V6). Specifically, customer claims that in January 2010 she experienced unintended acceleration where the pedal stuck to the ground. Customer further claims that she hit the brakes hard, put the vehicle into neutral and pulled it off the road.
4330	CAMRY	2010	1/30/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on an unknown date he was parked to fill the gas tank. Customer claims the key was in the ignition, the vehicle was in Park, and the handbrake was applied; while he was outside the vehicle, the vehicle began to move forward. He got in the car and pulled the handbrake again, but it did not stop, so he pressed on the brake pedal hard, and the vehicle finally stopped. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4331	RAV 4	2010	1/30/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. FTS did not inspect the vehicle. It is unknown if the claimed sudden acceleration occurs while the vehicle is already moving.
4332	COROLLA	2009	1/30/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on January 29, 2010 he had his cruise control on, took it off, and when he turned it back on the vehicle suddenly accelerated even though he was not pushing on the accelerator pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4333	TACOMA	2007	1/30/2010	Customer called regarding his 2007 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle lurched forward and revved up pretty high when trying to go forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4334	CAMRY	2010	1/30/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on an unknown date he recently experienced his vehicle's accelerator surging.
4335	MATRIX	2009	1/30/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date she was driving about 20 mph and not pressing on the gas pedal when the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4336	TUNDRA	2008	1/30/2010	Customer called regarding his 2008 Toyota Tundra. Specifically, customer claims that, on unknown dates, he experienced unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4337	AVALON	2009	1/30/2010	Customer called regarding his 2009 Toyota Avalon XL. Specifically, customer claims that on unknown dates before he pressed the accelerator pedal his vehicle lurched forward. Additionally, the customer claims he noticed his pedal sticking or stiffening.
4338	CAMRY	2007	1/30/2010	Customer called regarding her 2007 Toyota Camry. Customer claims that she was involved in an accident on 1/28/2010, but it is unclear whether acceleration was the problem.
4339	CAMRY	2010	1/30/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 1/29/10 his mother was driving when the vehicle experienced unintended acceleration, resulting in a collision. Customer further claims the driver applied the brakes but they did not respond. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4340	RAV 4	2009	1/30/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle does not accelerate properly and is slow/sluggish, but does not provide a specific date. It is unknown if FTS inspected the vehicle. The customer further claims the slowness occurs when the vehicle is already in motion.
4341	AVALON	2005	1/30/2010	Customer called regarding his 2005 Avalon. Specifically, customer claims that on unknown dates, he experienced unintended acceleration. Customer claims that the condition first occurred within the first 8 months of purchase.

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4342	AVALON	2007	1/30/2010	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on unknown dates she experienced her vehicle speeding up and slowing down.
4343	CAMRY	2007	1/30/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on January 26, 2010, when he took his foot off the accelerator to slow down his vehicle sped up and continued to do so after he applied the brakes, causing him to hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4344	CAMRY	2007	1/30/2010	Customer called regarding his 2007 Toyota Camry. There are no details of the problem provided.
4345	RAV 4	2009	1/30/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. It is unknown if FTS inspected the vehicle. It is unknown if the claimed sudden acceleration occurs while the vehicle is already moving.
4346	COROLLA	2009	1/30/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on January 30, 2010, she was stopped at a stop light when the vehicle speeds up, with rpm going over 4500 rpm, and and hit the vehicle in front of her. Customer further claims she slammed on the brakes, but was unable to stop in time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4347	COROLLA	2009	1/30/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date in July 2009 he was merging into the middle lane on the highway when the vehicle did not slow down, and he swerved into the center lane and hit the divider. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4348	RAV 4	2009	1/30/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration is relative to the proximity of the brake and accelerator pedals as opposed to the vehicle speed.
4349	CAMRY	2009	1/30/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates when in cruise control, his vehicle accelerated and decelerated on its own.
4350	AVALON	2005	1/30/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on unknown dates, she experienced unintended acceleration on three different occasions.
4351	TUNDRA	2007	1/30/2010	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that he was involved in an accident due to unintended acceleration. Customer claims that on December 6, 2009 he tried to brake the car and make a turn. Customer further claims that the vehicle took off and kept accelerating on its own. Customer states that the vehicle went down a hill and hit some trees. Customer states that he did not have his foot on either the gas pedal or the brake pedal when the vehicle began to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4352	TACOMA	2006	1/30/2010	Customer called regarding his 2006 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on unknown dates the vehicle has had many acceleration problems. Customer further claims that the vehicle took off at 110 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4353	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she was driving on the highway and tried to apply the brakes but the vehicle did not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4354	VENZA	2009	2/1/2010	Customer called regarding her 2009 Toyota Venza. Specifically, customer claims that, on unknown dates, she experienced accelerator issues. Customer claims that the sudden acceleration occurred when the vehicle was already in motion.
4355	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camy. Customer claims that in June 2009 the accelerator got stuck but does not have details of the incident.
4356	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she experienced vehicle acceleration issues ever since she bought it.
4357	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on unknown dates the vehicle unintentionally accelerated.

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4358	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that on November 11, 2009 her vehicle suddenly bucked forward, causing her to hit a pole. Customer further claims that she had her foot on the brake. Customer alleges that the incident occurred while she was pulling into a parking spot. Customer claims that these incidents occur while the vehicle was already in motion.
4359	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on unknown dates the vehicle accelerated on its own.
4360	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla S. Specifically, customer claims that on September 17, 2009, the vehicle accelerated suddenly at a red light and did not stop when she applied the brakes. Customer further claims that on February 14, 2010, the vehicle unintentionally accelerated on the highway. Customer further claims that she applied the brakes on the vehicle, proceeded to place the vehicle in neutral and cruised to the emergency lane. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4361	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she was parking her vehicle when it accelerated on its own and crashed into the curb at a Burger King.
4362	CAMRY	2008	2/1/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the engine revved up while brake was pressed three times. Customer further claims that the accelerator pedal stuck three times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4363	VENZA	2009	2/1/2010	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on an unknown date the vehicle did not decelerate right away and the rpms went really high when he exited the highway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4364	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry XLE. Specifically, customer claims that on 1/30/10 he was driving up the ramp in a parking garage when the vehicle would not stop accelerating, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4365	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry XLE. Specifically, customer claims that on unknown dates when she took her foot off the gas pedal her vehicle surged.
4366	CAMRY	2009	2/1/2010	Customer's husband called regarding customer's 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged when his wife was turning the corner and applied the brakes, causing her to hit the vehicle in front of her.
4367	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 1/27/10, while driving, he attempted to stop the vehicle but was unable to, and as a result rear-ended another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4368	CAMRY	2008	2/1/2010	Customer called regarding a 2008 Toyota Camry. Specifically, customer claims that on three unknown dates the vehicle revved as the break was applied.
4369	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle suddenly surged forward as it approached a stop sign. Customer further claims that two weeks later her vehicle suddenly surged forward, causing her to rear end another vehicle. Customer alleges that these incidents occur while the vehicle was already in motion.
4370	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving on the freeway at approx. 65 mph, the vehicle accelerated and he was only able to stop the vehicle because of a ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4371	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she experienced unintended acceleration.
4372	CAMRY	2008	2/1/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on December 7, 2009, the vehicle surged and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4373	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Without providing specifics, customer claims sometimes her vehicle will slow down when pressing the accelerator pedal and sometimes it will speed up on its own.
4374	RAV 4	2009	2/1/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on November 29, 2009 the vehicle surged, causing her to collide with another vehicle in a parking lot and to come to a stop in a pasture.

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4375	AVALON	2005	2/1/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that in December 2009 the vehicle accelerated on its own when she parking in her garage. Customer further claims that the vehicle did not stop when she pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4376	TUNDRA	2008	2/1/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on April 25, 2008 the vehicle failed to stop when his wife pressed the brakes while attempting to stop at a light, causing a collision with the vehicle in front of them. Customer further claims that the vehicle felt like it kept going and did not slow down when his wife pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4377	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on January 27, 2010, when she was making a left hand turn her accelerator pedal got stuck and took off, causing her to hit the sidewalk, bounded into a police car and kept going until she put the car in park.
4378	TACOMA	2006	2/1/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 1/30/2010, which caused an accident. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was at a complete stop.
4379	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date her daughter was pulling into a driveway and stepped on the brake, but the vehicle did not stop and ran into a garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4380	CAMRY	2008	2/1/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on unknown dates she was not able to stop the vehicle.
4381	AVALON	2006	2/1/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that in November 2008 the vehicle took off as he let off the brakes while stopped at a red light, causing him to rear end another vehicle. Customer further claims that the vehicle surged like crazy when driving 15 to 20 mph, and that he has experienced this acceleration over a dozen times. Customer claims that the sudden acceleration occurred both while the vehicle was at a full stop and while the vehicle was already in motion.
4382	PRIUS	2005	2/1/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates ever since she has had the vehicle, when it was stopped it sometimes gave a strong jerk forward as though it wanted to go. Customer further claims that if she did not press really hard on the brake, the vehicle would jerk and move forward.
4383	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in October 2009, she was pulling into a parking spot and she applied the brakes, but the vehicle accelerated, jumped the curb, and hit the building. Customer further claims that at the time, she was driving very slowly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4384	CAMRY	2008	2/1/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on unknown dates periodically after driving for 20 minutes his vehicle experienced unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4385	RAV 4	2009	2/1/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, which caused an accident on 12/19/2009. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4386	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 2/14/09, he was backing out of a driveway at approx. 30 mph when the accelerator pedal got stuck, causing him to hit another vehicle. Customer further claims that he pressed the brakes but the vehicle did not respond. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4387	COROLLA	2009	2/1/2010	Customer's grandson called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she was driving the vehicle and applied the brakes but the vehicle continued to move. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4388	AVALON	2008	2/1/2010	Customer called regarding her 2008 TOyota Avalon Limited. Specifically, customer claims that on July 29, 2009, she was involved in an accident that she now believes might have been caused by an accelerator problem. Customer claims that she did not have the vehicle inspected at the time of the accident.

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4389	CAMRY	2010	2/1/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on unknown dates, when he hit the accelerator pedal, vehicle shot forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4390	COROLLA	2010	2/1/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle revved to high RPMs while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4391	RAV 4	2009	2/1/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, which caused an accident, but failed to specify a date. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4392	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that on January 30, 2010 her vehicle suddenly accelerated forward when she applied the emergency brake, causing her to crash into a flowerpot. Customer further claims that before the accident the vehicle was jerking. Customer alleges that the incident occurred while the vehicle was at a full stop.
4393	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that she had the vehicle in reverse but it did not seem as if the motor was working, so she pressed the accelerator and the vehicle moved forward.
4394	TACOMA	2005	2/1/2010	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but failed to provide a specific date. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
4395	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on an unknown date, she felt like vehicle accelerated forward when customer was on the highway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4396	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her vehicle pauses when she presses the accelerator pedal.
4397	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry.
4398	AVALON	2007	2/1/2010	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on unknown dates she noticed that gas pedal seemed to hesitate when depressed, and when she pressed harder on the gas pedal, the vehicle lurched forward quickly.
4399	VENZA	2009	2/1/2010	Customer called regarding her 2009 Toyota Venza. Specifically, customer claims that, on unknown dates, the accelerator pedal got stuck to floor. Customer further claims that, although accelerator was in up position, vehicle accelerated and that even though the customer applied the brakes, she was unable to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4400	CAMRY	2007	2/1/2010	Customer's boyfriend called regarding her 2007 Toyota Camry. Specifically, boyfriend claims that sometime in April or May 2009 customer's vehicle suddenly accelerated as she was approaching a red light and collided with a trailer hitch.
4401	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that in October 2009, he was driving in the rain when the vehicle failed to respond to the brakes. Customer further claims that as a result, he hit a truck.
4402	COROLLA	2009	2/1/2010	Customer called regarding his 2009 Toyota Corolla S. Specifically, customer claims that on unknown dates when he let off the gas and went to hit the brake, the vehicle did not slow down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4403	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry XLE. Specifically, customer claims that on 3/24/09 she was approaching a stop sign and began to press the brake when the vehicle surged forward, resulting in a collision. Customer further claims she has been involved in 5, 6, or 7 (stated during three different calls) accidents due to surging. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4404	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camry. Without providing specifics, customer claims that his vehicle experienced unintended acceleration in 2007.
4405	TACOMA	2009	2/1/2010	Customer called regarding his 2009 Toyota Tacoma Acc Cab 4. Specifically, customer claims that on an unknown date when he stopped at a traffic light his vehicle surged. Customer further claims that when he was turning into a parking spot the vehicle took off, causing him to hit another vehicle. Customer claims that the brake was depressed when the sudden acceleration occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4406	PRIUS	2008	2/1/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on 8/00/09, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4407	CAMRY	2008	2/1/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 12/28/09, while driving home, she applied the brakes and the vehicle lost control, and she hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4408	AVALON	2008	2/1/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on January 27, 2010, her husband was driving and went to stop, however, the vehicle automatically accelerated and hit the vehicle in front of him. Customer did not want to wait the 30 days for inspection. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4409	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date when she pressed down on the accelerator pedal it went very slow and then lunged forward, causing the customer to use her emergency brake.
4410	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that her daughter was driving on her driveway when the steering and brakes failed. The vehicle slid to one side of the driveway and hit a tree, then continued to accelerate and hit another tree. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4411	CAMRY	2007	2/1/2010	Customer called regarding her two 2007 Toyota Camrys. Customer reports no problems, but wants an alternate vehicle to replace vehicles affected by recall.
4412	TUNDRA	2008	2/1/2010	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that the vehicle lurches and gets bad gas mileage.
4413	ES350	2007	2/1/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on or about a month prior to February 1, 2010, her vehicle suddenly accelerated too much.
4414	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that in November 2008 she depressed the brake pedal while trying to park and the accelerator raced, causing her vehicle to crash through three parked vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4415	RAV 4	2009	2/1/2010	Customer emailed regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle sometimes surged and slightly accelerated before returning to normal speed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4416	RAV 4	2010	2/1/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on unknown dates whenever she went over a hill her vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4417	COROLLA	2009	2/1/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and she was afraid to drive the vehicle.
4418	AVALON	2008	2/1/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, he and his wife were almost involved in a vehicle accident. Customer claims that he was finally able to pull off to the side of the road and stop the vehicle.
4419	SEQUOIA	2008	2/1/2010	Customer called in regarding a 2008 Toyota Sequoia. Specifically, the customer claims the vehicle suddenly unintentionally accelerates, but failed to specify a date. FTS did not inspect the vehicle. It is unknown if the claimed sudden acceleration occurs while the vehicle is already in motion.
4420	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in January or February 2010 his wife was applying the brakes while approaching a stoplight and the vehicle suddenly accelerated and collided with another vehicle.
4421	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on 1/28/10 he was in line at a drive-through and began to pull forward, when his vehicle took off. He applied the brakes but it didn't stop before colliding with the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4422	AVALON	2007	2/1/2010	Customer called regarding her 2007 Toyota Avalon Limited. Specifically, customer claims that in November 2009, his wife was involved in a car accident. Customer claims that his wife was pulling into a parking space when her vehicle suddenly accelerated, causing it to hit three parked vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4423	ES350	2007	2/1/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, her vehicle went out of control and the RPMs also went out of control. Customer further claims the brakes have also been squeaking.
4424	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on December 22, 2007, the pedal stuck and he was unable to stop. Customer further claims that the vehicle spun and got hit by a truck.
4425	AVALON	2009	2/1/2010	Customer called regarding his 2009 Toyota Avalon XLS. Specifically, customer claims that on January 4, 2010, while pulling into a parking space, she put her foot on the brake, and the car kept going. Customer further claims the vehicle went air born and went into a small embankment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4426	CAMRY	2008	2/1/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date he experienced pedal acceleration while driving.
4427	AVALON	2007	2/1/2010	Customer's daughter called regarding customer's 2007 Toyota Avalon. Specifically, customer's daughter claims that on an unknown date the vehicle lurched forward when her mother took her foot off of the gas and prepared to park while driving uphill in a parking lot, causing an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4428	CAMRY	2009	2/1/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates when she merged or joined the interstate, the vehicle accelerated too much; when she tapped on the pedal, the vehicle accelerated more than required; and that when she stopped at a stop sign and then took her foot off the brake, the vehicle accelerated to 10-25 mph even without her pressing the accelerator pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4429	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that in June 2009 his vehicle suddenly took off when he was at a stop. Customer further claims he experienced unintended acceleration two additional times. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4430	AVALON	2005	2/1/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on January 27, 2009, his wife was involved in an accident. Customer claims that his wife hit a telephone pole when she lost control of her vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4431	TACOMA	2006	2/1/2010	Customer called regarding his 2006 Toyota Tacoma. Specifically, customer claims that on January 31, 2010, his vehicle continued moving as he pressed on the break, causing him to crash into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion. Customer also claims that on February 3, 2010, his vehicle experienced unintended acceleration, and he nearly hit a pedestrian. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4432	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Without providing specifics, customer claims that on an unknown date she had an accident involving unintended acceleration.
4433	IS250	2010	2/1/2010	Customer called regarding her 2010 Lexus IS 250. Specifically, customer claims that on an unknown date, while turning a corner, the vehicle accelerated on its own. Customer claims that she applied the brakes and the vehicle eventually stopped after 1/8 of a mile. Customer further claims that the incident occurred more than once. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4434	AVALON	2010	2/1/2010	Customer called regarding his 2010 Avalon. Specifically, customer claims that he has started to feel the brake pedal "binding."
4435	CAMRY	2010	2/1/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on December 20, 2009, she had an accident in the drive thru at the bank. Customer further claims that the door was open and she was stepping on the brake but the car took off. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4436	TUNDRA	2008	2/1/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on unknown date the vehicle's engine or stereo made a loud sound causing the vehicle to shake. Customer further claims that the vehicle's engine has revved or slowed down irregularly.

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4437	ES350	2007	2/1/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on or about 3 months ago, the customer had an issue with accelerating without pressing on the accelerator. Customer claims that the condition did not repeat itself.
4438	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically, customer claims that in September 2007 her vehicle suddenly lurched forward when she was 2/3 of the way into a parking space, causing her vehicle to jump a parking curb and crash into a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4439	CAMRY	2008	2/1/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date there was an instance of sudden acceleration that caused an accident.
4440	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 1/12/2010 while driving on the highway she pressed the brake pedal and the vehicle accelerated, colliding with another vehicle.
4441	TUNDRA	2007	2/1/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on unknown date the vehicle did not stop when he pressed on the brake with both feet while driving on highway. Customer further claims that the vehicle does not shift out of 4th gear. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4442	CAMRY	2008	2/1/2010	Customer called regarding her 2008 Toyota LE. Specifically, customer claims that on January 28, 2010, the vehicle accelerated on its own. The vehicle surged while her foot was on the brake and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4443	AVALON	2008	2/1/2010	Customer called regarding his 2008 Toyota Avalon Touring. Specifically, customer claims that in October of 2009, while his daughter was driving, the vehicle accelerated in a parking lot through some bushes. Customer claims that initially he thought his daughter put her foot on the gas and not the brake, however since hearing about the pedal recall, he thinks that the accident was not her daughter's fault. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4444	CAMRY	2009	2/1/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while driving on the street at about 45 mph, he pressed on the brakes but the vehicle would not stop. Customer further claims that there were all weather mats in the driver's side of the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4445	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 1/1/2010 her vehicle struck a guardrail. Customer believes that unintended acceleration might have been the cause.
4446	AVALON	2006	2/1/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle surged forward.
4447	COROLLA	2009	2/1/2010	Customer's mother called regarding customer's 2009 Toyota Corolla S. Specifically, customer claims that in January 2010 her daughter's vehicle spun out, causing her to plow into a snowbank.
4448	CAMRY	2008	2/1/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own. The vehicle surged while his foot was on the brake and hit a wall and another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4449	TACOMA	2008	2/1/2010	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated on 2/1/2010. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
4450	CAMRY	2007	2/1/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that in the spring of 2008 his vehicle took off when he placed his foot onto the brake, causing him to get into an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4451	CAMRY	2007	2/1/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date as she was approaching a stop sign her vehicle sped up for no reason despite pressing her brakes, causing her vehicle to surge. Customer further claims that she experienced sudden acceleration two additional times. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4452	CAMRY	2010	2/2/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 1/6/10 his daughter was driving the vehicle over 10mph and went through a stop sign, resulting in a collision.

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4453	CAMRY	2008	2/2/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 12/28/2009 his wife was pulling out of a parking lot when the vehicle suddenly accelerated and struck the curb. Customer further claims that when he picked her up and drove home the problem occurred again without causing an accident.
4454	PRIUS	2007	2/2/2010	Customer called regarding his 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates when he drove his vehicle between 20-50 mph he felt a slight surge.
4455	AVALON	2006	2/2/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle shot back while in reverse inside his garage. Customer further claims that on a later unknown date the vehicle went forward and ran into a boat. Customer further claims that the vehicle has accelerated three more times. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4456	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Without providing specifics, customer claims that his vehicle has experienced unintended acceleration while driving on the highway.
4457	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in December 2009 his fiancée was making a turn when the vehicle would not stop and collided into a pole. Customer further claims that vehicle subsequently accelerated through a stop sign while he was driving and that his wife experienced a second unintended acceleration after the stopsign incident.
4458	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle unintentionally accelerated as her son was backing the vehicle out of the driveway. Customer further claims that the previous owner of this car experienced unintended acceleration when he was exiting a parking garage. Customer alleges that the incident occurred while the vehicle was already in motion.
4459	CAMRY	2010	2/2/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates after having the AOA recall performed, he was driving about 30 MPH and the vehicle surged forward and increased in speed by about 5 MPH. Customer further claims that prior to the fix he experienced the similar surging feel but only when he was parking and after he pressed the pedal once. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4460	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on December 24, 2009, she attempted to stop and the vehicle kept going and hit a large rock. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4461	ES350	2010	2/2/2010	Customer called regarding his 2010 Lexus ES 350. Specifically, customer claims that while pulling into his driveway, he steered into his neighbor's yard and got stuck in the snow. Customer further claims that the engine went down.
4462	TACOMA	2007	2/2/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused an accident on 2/9/2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
4463	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her daughter was driving the vehicle in May 2009 when the vehicle suddenly accelerated and hit a pole.
4464	AVALON	2005	2/2/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on unknown dates, on two or three occasions, he has had issues with his vehicle.
4465	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Without providing specifics, customer claims that she experienced sudden acceleration on vehicle.
4466	CAMRY	2009	2/2/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/2/2010, her daughter was driving the vehicle when it accelerated forward, causing her to run through a red light and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4467	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that approximately a year ago his wife was driving at the vehicle when it suddenly accelerated from 35 mph to 60 mph. Customer further claims that his wife stood on the brakes, threw the car into neutral, pulled to the side of the road and cut the engine. Customer alleges that when he turned the car on it continued to rev and lurch. Customer claims that these incidents occurred while the vehicle was already in motion.

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4468	CAMRY	2008	2/2/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date, he was driving forward into a parking space when the vehicle began to accelerate, causing him to hit a wall. Customer further claims that he applied the brakes before he hit the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4469	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that February 1, 2010 his vehicle suddenly accelerated, causing him to spin out of control and hit a center divider. Customer further claims that it felt like the engine was revving. Customer further claims that sometimes the vehicles surges. Customer alleges that these incidents occurred while the vehicle was already in motion.
4470	TACOMA	2007	2/2/2010	Customer called regarding his 2007 Toyota Tacoma V6. Specifically, customer claims that on an unknown date his engine surged while he was driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4471	IS250	2009	2/2/2010	Customer called regarding his 2009 Lexus IS 250. Specifically, customer claims that on an unknown date, while his wife was driving the vehicle, it accelerated while she had her foot on the brake as she was getting ready to park, causing her to fly over a curb into a grassy median and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4472	AVALON	2006	2/2/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on January 5, 2010 the vehicle accelerated as she was pulling into a parking spot, causing her to hit a cement block. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4473	CAMRY	2008	2/2/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates she experienced acceleration problems -- she stepped on the gas but the vehicle remained at the same velocity; she drove at a constant speed of 45 mph and noticed that the vehicle jerked and accelerated to 50-55 mph until the customer braked. Customer further claims almost every time she braked, the vehicle started to feel rough.
4474	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated and revved when in park and when she applied the brakes going downhill or approaching stop lights. Customer claims that the sudden acceleration occurred on multiple occasions, both while the vehicle was at a full stop and while already in motion.
4475	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Customer claims that on 11/13/2009 her fiancé was driving the vehicle and lost control when applying the brakes to avoid a car in front of them. Customer further claims that her fiancé yelled "these damn brakes, the brakes," but does not know anything more about the accident.
4476	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Without providing specifics, customer claims that she has noticed acceleration problems on her vehicle.
4477	TUNDRA	2007	2/2/2010	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that he was involved in an accident in July 2009. Customer further claims that he had his foot on the brake but the vehicle kept going. Customer claims that the vehicle shot forward and hit a trailer hitch. Customer states that vehicle sustained damage to the front bumper.
4478	AVALON	2005	2/2/2010	Customer called regarding her 2005 Toyota Avalon XL. Specifically, customer claims that on an unknown date, her son was involved in an accident and is now being charged with assault with a motor vehicle by the CT State Police. Customer claims that her son said that the vehicle was accelerating on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4479	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on November 5, 2009, she was driving the vehicle and stepped on the brake pedal but the vehicle accelerated and she hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4480	TACOMA	2006	2/2/2010	Customer called regarding his 2006 Toyota Tacoma V6. Specifically, customer claims that when he was leaving a gas station the vehicle had unintended acceleration. Customer further claims that there was another instance where the vehicle surged forward when he applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4481	COROLLA	2010	2/2/2010	Customer's father called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that she was driving and attempted to stop to avoid another vehicle but her vehicle continued to accelerate when she stepped on the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4482	CAMRY	2008	2/2/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 1/20/10, while coming to a stop at an intersection and stepping on the brakes, the vehicle accelerated and struck the vehicle in front. Customer further states that he was going very slowly when this incident occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4483	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 30, 2010, she was pulling into her driveway and applied the brake but the vehicle accelerated and crashed into the garage. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4484	TUNDRA	2010	2/2/2010	Customer called regarding his 2010 Toyota Tundra 4x4. Specifically, customer claims that on January 29, 2010 the vehicle took off when in reverse after plowing snow. Customer further claims that the vehicle hit a pole and veered into a snow plow. Customer claims that the parking lot was icy and that he tried to brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4485	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle took off on its own and he had to slam the vehicle into neutral to stop it.
4486	COROLLA	2010	2/2/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 30, 2010 she was driving the vehicle and tried to brake but the vehicle accelerated and hit a parked vehicle and a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4487	CAMRY	2008	2/2/2010	Customer called regarding her 2008 Toyota Camry CE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. She applied the brake and the vehicle zoomed forward, hitting a curb and another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4488	HIGHLANDER	2010	2/2/2010	Customer called regarding her 2010 Toyota Highlander. Specifically, customer claims that on an unknown date she experienced sudden acceleration.
4489	CAMRY	2010	2/2/2010	Customer called regarding her 2010 Toyota Camry Sedan. Specifically, customer claims that on in December 2009 his wife was driving the vehicle and was turning left into her driveway, when the car experienced an unintended acceleration and ran into a flower bed. Customer further claims that in January 2010 his wife was driving and slow down to drive over a bump, but the car accelerated on its own; she was able to stop the car with the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4490	COROLLA	2010	2/2/2010	Customer called regarding his 2010 Toyota Corolla Standard. Specifically, customer claims that on February 1, 2010, his vehicle experienced unintended acceleration. Customer further claims that on an unknown date his wife also experienced unintended acceleration while driving the vehicle.
4491	CAMRY	2009	2/2/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle jerks and accelerates in both Drive and Reverse, usually in her driveway. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4492	CAMRY	2010	2/2/2010	Customer's wife called regarding customer's 2010 Toyota Camry LE. Specifically, customer's wife claims that on an unknown date, customer was driving the vehicle, and he was not able to stop the vehicle, and had to pull the key out.
4493	COROLLA	2009	2/2/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date in 2009 he had an accident due to sudden acceleration.
4494	MATRIX	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date she pulled out in front of another vehicle and her vehicle would not stop. Customer further claims that on another unknown date she hit the wall in her garage.
4495	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that about a year ago her son was driving the vehicle when it suddenly jumped, causing him to hit the vehicle in front of him. Customer further claims that at the time of the accident he was traveling approximately 20-25 mph. Customer alleges that this incident occurred while the vehicle was already in motion.
4496	COROLLA	2010	2/2/2010	Customer emailed regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he found that the car still went very fast even after he released the accelerator pedal.

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4497	TUNDRA	2007	2/2/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on February 1, 2010 the vehicle would not stop and kept going and experienced unintended acceleration as he hit the brakes. Customer further claims that this caused him to run into another vehicle. Customer further claims that in cold weather the vehicle's tachometer stayed at 2000 rpm until it warmed up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4498	TACOMA	2008	2/2/2010	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date, but some time in January 2010, the vehicle accelerated while he was in reverse, trying to move out of a parking space, resulting in no damage.
4499	RAV 4	2009	2/2/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on January 30, 2010 the vehicle accelerated and took off when she was pulling into a parking space, causing her to hit a handicap pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4500	CAMRY	2009	2/2/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that in August 2009 when his wife was driving on the freeway, the vehicle suddenly accelerated for 6 miles before returning to the intended speed. Customer further claims that the cruise control had not been deployed. Customer further claims that in December 2009 when his wife was warming up the vehicle she had to press the accelerator pedal twice because it felt stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4501	RAV 4	2009	2/2/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on an unknown date her vehicle would not stop when the brakes were applied, causing her to rear end another vehicle.
4502	COROLLA	2010	2/2/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 2, 2010 she was driving when the vehicle suddenly accelerated and hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4503	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 28, 2010, her vehicle suddenly accelerated while she was turning a corner and ran into the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4504	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her son was driving the vehicle when it suddenly accelerated and crashed and rolled over.
4505	ES350	2010	2/2/2010	Customer called regarding his 2010 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle surged and experienced unintended acceleration. An FTS inspected the vehicle.
4506	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date she experienced her vehicle jerking forward. Customer further claims that when she let her foot off the accelerator it made a noise not as if pedal was sticking.
4507	TACOMA	2009	2/2/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle accelerated on its own upon start up, and that he applied the brakes in order to stop the vehicle.
4508	AVALON	2005	2/2/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle accelerated and took off 20 feet when she was stopped at a light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4509	COROLLA	2010	2/2/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date her vehicle suddenly accelerated and she went through a red light. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4510	MATRIX	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date she was pulling into a parking space and thought she had stopped but the vehicle continued to travel and hit the handicapped parking sign. Customer further claims that on another unknown date her husband drove into a parking lot and put his foot on the brake pedal but the vehicle kept moving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4511	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 12/20/2009 he and his wife were driving on the interstate when his vehicle would not slow down, forcing him to swerve into another vehicle.

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4512	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on May 21, 2009, she was driving and saw that the traffic in front of her was slowing down so she applied the brakes, but the vehicle did not slow down and hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4513	TACOMA	2008	2/2/2010	Customer called in regarding a 2008 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused an accident in 5/2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already moving.
4514	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that [on an unknown date] his vehicles engine raced and lurched forward, causing him to hit another vehicle. Customer further claims that the vehicle's headlamps, bumper and hood were damaged. Customer alleges that the incident occurred when he had his foot on the brake and the vehicle was at a full stop.
4515	TUNDRA	2007	2/2/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on December 12, 2009 the vehicle accelerated on its own up to 85 mph, which caused his cousin to drive it into another vehicle. Customer further claims that his cousin pressed on the brakes 10 times but that they did not respond. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4516	IS250	2007	2/2/2010	Customer called regarding her 2007 Lexus IS 250. Specifically, customer claims that on an unknown date, his vehicle was towed to the dealer for unintended acceleration.
4517	COROLLA	2010	2/2/2010	Customer's mother called regarding customer's 2010 Toyota Corolla S. Specifically, customer claims that on January 16, 2010, customer's vehicle crashed into an embankment.
4518	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on February 2, 2010, she was trying to park the vehicle and her foot was on the brake when the vehicle surged forward and hit the fence. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4519	TACOMA	2006	2/2/2010	Customer called regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on unknown dates the vehicle's pedal has stuck to the floor on three occasions. Customer further claims that the vehicle's transmission slips, and that when at a stop sign or traffic light with his foot on the brake, the vehicle felt as though it was shifting gears.
4520	CAMRY	2009	2/2/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 1/25/10, she was driving at about 35-40 mph when she tried to stop her vehicle, but it continued to proceed. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4521	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 11/03/2009 her vehicle continued to accelerate as she was applying the brakes, striking another vehicle.
4522	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle accelerated on its own.
4523	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he was in an accident in November 2008 when the vehicle accelerated by itself. Customer further claims that his speed before impact was 10 miles per hour.
4524	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry. Without providing specifics, customer claims that vehicles accelerates after coming to a stop.
4525	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that in October 2009 his vehicles was stopped at a light when it suddenly accelerated, causing him to hit an oncoming vehicle, spin across the street and crash into a fence. Customer alleges that the incident occurred when he had his foot on the brake and the vehicle was at a full stop.
4526	VENZA	2009	2/2/2010	Customer called regarding his 2009 Toyota Venza V6 Sedan. Specifically, customer claims that unknown dates when he was stopped at a traffic light with the brake pedal depressed, his vehicle suddenly accelerated. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4527	COROLLA	2009	2/2/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates she felt the engine accelerate. Customer further claims that there was a noise in the engine when the vehicle started. Customer further claims that after the pedal was repaired, the engine made a revving noise when she pressed the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4528	RAV 4	2009	2/2/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerates and the engine runs at high idle, the most recent occurrence of which was 2.1.2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4529	CAMRY	2007	2/2/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates when she accelerated, even at slow rate, her vehicle seemed to jump or jerk a little.
4530	AVALON	2005	2/2/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on August 8, 2007, his vehicle hit an embankment on the freeway.
4531	CAMRY	2008	2/2/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that she does not feel safe driving her vehicle, and wants her car payments refunded.
4532	CAMRY	2009	2/2/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 9/13/09, he was driving on a street at about 45-50 mph when another vehicle pulled in front of him. Customer further claims that he was not sure if the accelerator stuck or not, but he believes that he was able to apply the brakes; nonetheless, he hit the vehicle that pulled in front.
4533	AVALON	2007	2/2/2010	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that he wanted his case reopened.
4534	CAMRY SOLARA	2008	2/2/2010	Customer called regarding her 2008 Toyota Camry Solara. Specifically, customer claims that on October 5, 2009, her vehicle experienced unintended acceleration while trying to park, causing her to hit a tree and a sign. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4535	TUNDRA	2007	2/2/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that when he is at a stop sign or red light, he feels as if the vehicle jumps forward. Customer further claims that when accelerating, he feels that the vehicle revs too much. Customer claims that sudden acceleration occurs when the vehicle is at a full stop.
4536	TUNDRA	2008	2/2/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on January 30, 2010 the vehicle's engine accelerated and the vehicle increased in speed as he applied the brakes to make a turn. Customer further claims that the vehicle went over an embankment and landed on its side in a creek. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4537	TUNDRA	2007	2/2/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on three (3) unknown dates his vehicle experienced unintended acceleration. The first occurred while backing into his driveway, causing him to hit a tree. The second and third occurred as he was driving and the car bolted forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4538	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he experienced unintended acceleration when he drove on the freeway. Customer further claims that when he attempted to engage the brakes, the vehicle continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4539	CAMRY	2009	2/2/2010	Customer called regarding his 2009 Toyota Camry Hybrid. Specifically, customer claims that on 2/9/10 his wife was in a parking lot when the vehicle suddenly accelerated and jumped two curbs, resulting in a collision. She is sure her foot was on the brake. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4540	AVALON	2005	2/2/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on January 29, 2010 the vehicle accelerated while his foot was on the brake in a parking lot after having just parked, causing him to hit another parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4541	PRIUS	2008	2/2/2010	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4542	CAMRY	2007	2/2/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims he was concerned about the recall. Customer further claims that the gas pedal was slow to return.
4543	CAMRY	2009	2/2/2010	Customer called regarding her 2009 Toyota Camry Hybrid. Specifically, customer claims that on in January 2010 she was driving 55-60 mph when suddenly the vehicle jerked and began to accelerate; she put the vehicle in neutral and the vehicle stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4544	PRIUS	2007	2/3/2010	Customer called regarding his 2007 Toyota Prius Touring Edition. Specifically, customer claims that on July 17, 2009, his vehicle experienced unintended acceleration as he stepped on the brake while parking, causing him to run into a building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4545	CAMRY	2009	2/3/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date, he was driving at approx. 25mph when he approached a stop sign and took his foot off the pedal, but the vehicle accelerated on its own and stayed at a speed of about 25 mph. Customer further claims that he believes the gas pedal was slow to return, and that he knows the floormat was not involved because the mat's retaining clips were attached. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4546	CAMRY	2010	2/3/2010	Customer called regarding his 2010 Toyota Camry Sedan. Specifically, customer claims that on 2/2/10 his father was driving when the vehicle experienced sudden acceleration. Customer further claims the vehicle sometimes does not respond when the accelerator is pressed. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4547	CAMRY	2009	2/3/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 1/27/10, while driving, he attempted to make a stop and pressed on the brake but the vehicle did not slow down and kept going at the same speed. Customer further claims that as a result, he hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4548	VENZA	2009	2/3/2010	Customer called regarding 2009 Venza. Specifically, customer claims that the vehicle lurches forward at braking. Customer further claims that vehicle idles high.
4549	TUNDRA	2008	2/3/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that in November or early December 2009, the vehicle accelerated in reverse. The driver claims that he was unable to stop the vehicle and the vehicle sustained rear end damage. Customer further claims that the vehicle sped up and didn't want to stop.
4550	CAMRY	2008	2/3/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that in December 2009, she was driving over a hilly road when the car accelerated on an uphill. Customer further claims that she pumped the brakes and then held both of her feet on the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4551	PRIUS	2008	2/3/2010	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4552	COROLLA	2009	2/3/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date when she was slowing down to come to a stop, the RPMs went up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4553	CAMRY	2008	2/3/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date, the vehicle may have accelerated on its own causing his wife's accident. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4554	RAV 4	2010	2/3/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle experiences acceleration problems. FTS did not inspect the vehicle. It is unknown if the acceleration issues occur while the vehicle is already in motion.
4555	COROLLA	2009	2/3/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date his daughter felt the vehicle accelerate.
4556	PRIUS	2007	2/3/2010	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4557	CAMRY	2009	2/3/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he experienced acceleration.
4558	CAMRY	2010	2/3/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates while driving the vehicle, the vehicle was pulling forward and going faster. Customer claims that the sudden acceleration occurred while the vehicle already in motion.
4559	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/02/2010 she was reversing into a parking spot when the car accelerated into a pole.

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4560	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 3/29/10 she was driving down an exit ramp and began to press the brake; she pressed it to the floor, but the vehicle surged and sped up, until the brakes finally worked. Customer further claims that it felt like the cruise control engaged momentarily and then disengaged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4561	PRIUS	2007	2/3/2010	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4562	CAMRY	2007	2/3/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in October 2009 and again on 1/09/2010 the vehicle took off while driving and crashed, once into a pole and once into another vehicle.
4563	COROLLA	2009	2/3/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that she was driving into a truck stop and turned to park and the vehicle launched into the vending machines and building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4564	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on July 18, 2009, her vehicle suddenly accelerated while she was driving slowly on an entrance ramp to the highway, causing her to rear-end the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4565	AVALON	2008	2/3/2010	Customer called regarding his 2008 Toyota Avalon Touring. Specifically, customer claims that on an unknown date, while driving, his vehicle accelerated by itself. Customer claims to have set up an appointment with the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4566	TACOMA	2008	2/3/2010	Customer called regarding his 2008 Toyota Tacoma Prerunner. Specifically, customer claims that on two (2) unknown dates, his vehicle experienced unintended acceleration, neither resulting in damage. The incident involved the vehicle accelerating while stopped at a red light. The second involved the vehicle accelerating and revving while waiting for a parking space. Customer claims that the sudden acceleration occurred, in both instances, while the vehicle was at a full stop.
4567	CAMRY	2010	2/3/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, he and his family have experienced excessive acceleration.
4568	RAV 4	2010	2/3/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on 1/30/2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4569	TACOMA	2008	2/3/2010	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle experienced unintended acceleration. Customer further claims that she and her husband appear in Toyota commercials, and are extremely embarrassed. Customer further claims that her Scion xB experienced unintended acceleration as well.
4570	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that [on an unknown date] her vehicle suddenly accelerated. Customer claims that the sudden acceleration occurred as she was pulling into a parking spot. Customer further claims that she frequently experienced this sudden acceleration on the freeway.
4571	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 7/29/09, she was driving at approx. 30mph when the brakes failed, causing her to crash into another car. Customer further claims that a previous incident with acceleration occurred in August 2008. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4572	CAMRY	2008	2/3/2010	Customer called regarding her 2008 Toyota Camry Hybrid. Specifically, customer claims that on an unknown date the vehicle jolted forward when she pressed the brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4573	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 12/24/2006 her vehicle suddenly accelerated while driving and crashed into a wall.
4574	CAMRY	2008	2/3/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on at unknown date she stopped her vehicle and suddenly found it going backwards, and when she hit the gas slightly the vehicle accelerated rapidly, causing her to hit a gate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4575	CAMRY	2008	2/3/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date she was driving at approx. 65mph when she felt the accelerator get stuck; she felt the vehicle jerk a bit. Customer further claims that when she went to step on the brakes, the vehicle did not slow and she had no choice but to swerve and hit a pole/railing. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4576	CAMRY	2010	2/3/2010	Customer called regarding her 2010 Camry LE. Specifically, customer claims that on unknown dates, when she applied the gas pedal, vehicle lurched forward after a slight pause. Customer further claims she the condition was getting worse.
4577	CAMRY	2007	2/3/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on two occasions, one in October 2009 and one on an unknown date, his vehicle accelerated more than it should have while he was pressing the gas pedal.
4578	MATRIX	2009	2/3/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4579	TUNDRA	2007	2/3/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on December 7, 2009 the vehicle just took off while he was driving it up a hill. Customer further claims that the vehicle went sideways and that the vehicle continued to fishtail after he applied the brakes, causing him to run into a guardrail. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4580	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she experienced an unintentional acceleration as she was turning her vehicle into her driveway and the vehicle took off and collided with column.
4581	MATRIX	2009	2/3/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on January 27, 2010 his wife was driving on to an on ramp and had her foot on the brake to slow down, but the vehicle accelerated and ran into an embankment. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4582	AVALON	2007	2/3/2010	Customer's husband called regarding customer's 2007 Toyota Avalon XL. Specifically, customer claims that on October 18, 2009, as she was pulling into the driveway, she pressed the brake pedal and the vehicle surged forward, causing her to hit a tree a few feet away. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4583	COROLLA	2009	2/3/2010	Customer emailed regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates when he applied the brakes, the vehicle sped up before it stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4584	CAMRY	2007	2/3/2010	Customer's husband called regarding her 2007 Toyota Camry. Customer's husband claims that in December 2009 the vehicle had four occurrences of unintended acceleration. On the last occurrence, the vehicle ran off the road while customer's husband was driving.
4585	CAMRY	2007	2/3/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on two or three occasions, dates unknown, the vehicle unintentionally accelerated.
4586	CAMRY	2009	2/3/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date she was trying to park the vehicle when it suddenly jolted forward. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4587	TUNDRA	2010	2/3/2010	Customer called regarding 2010 Toyota Tundra 4X4. Specifically, customer claims that when he was pulling out of the driveway, he went to apply the gas and the vehicle took off and surged forward, hitting a fence pole. Customer claims that the incident happened on January 2, 2010. Customer further claims that on January 31, 2010, he was backing up the vehicle and when he went to apply the brakes the vehicle did not stop. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4588	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that vehicle accelerates while in park.
4589	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she was traveling at 65 mph and could not stop, even when she shifted into neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4590	CAMRY	2007	2/3/2010	Customer's daughter called regarding her 2007 Toyota Camry. Specifically, customer's daughter claims that on two occasions, both in April 2009, the vehicle jumped forward while in motion, the second time colliding with a brick planter in a parking lot.

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4591	TACOMA	2009	2/3/2010	Customer called regarding 2009 Toyota Tacoma Prerunner. Specifically, customer claims that he was in an accident on February 3, 2010 when he pulled into a parking space with his foot on the brake. Customer further claims that his vehicle lunged forward, causing the car to hit a wall. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4592	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date she was driving on the highway and was unable to slow down the vehicle, rearending another vehicle. Customer further claims that her car feels like it idles high.
4593	CAMRY	2007	2/3/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that [on an unknown date], while on cruise control, he felt his vehicle accelerate. Customer further claims that once he applied the brakes the vehicle came to a stop. Customer alleges that the incident occurred while the vehicle was in motion.
4594	CAMRY	2010	2/3/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on 2/3/10 she applied the brakes but the vehicle accelerated instead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4595	COROLLA	2009	2/3/2010	Insurance agent called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on February 2, 2010 she was driving down the road when the vehicle just took off and she ran into a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4596	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that vehicle accelerates on its own while driving.
4597	AVALON	2006	2/3/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle felt like it surged ahead while he was stopping. Customer further claims that the vehicle surged again, and although the brakes were working, it caused him to lightly hit another vehicle's bumper. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4598	CAMRY	2009	2/3/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on various unknown dates the vehicle jerks as if trying to accelerate. Customer claims she was traveling over a bump and pressed the brake; the pedal went all the way to the floor but vehicle did not stop, so she hit the accelerator then the brake again and finally it stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4599	COROLLA	2010	2/3/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on February 1, 2010, his daughter was driving on the highway and attempted to brake but the vehicle would not stop, so she shifted to neutral to get it to stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4600	PRIUS	2004	2/3/2010	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4601	PRIUS	2008	2/3/2010	Customer emailed regarding his 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, but at least once a week, he got bursts of acceleration followed by his "slip indicator" light coming on. Customer claims the sudden acceleration occurred while the vehicle was already in motion.
4602	TUNDRA	2008	2/3/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle once experienced unintended acceleration with the cruise control on. Customer further claims that the vehicle stopped accelerating when the cruise control was turned off.
4603	TUNDRA	2008	2/3/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date, his vehicle idled highly, causing the car to accelerate into his garage wall just after he had started the car. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4604	CAMRY	2008	2/3/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on unknown dates she noticed that when she drove in "cruise control," the vehicle slightly increased in speed.
4605	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that at times her vehicle surges and accelerates when it is at a stop. Customer further claims that she experienced this sudden acceleration while the vehicle was not in motion.
4606	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that her vehicle has been surging and accelerating.

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4607	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date she was parking her vehicle and turned the motor off, when suddenly the vehicle lunged forward and hit a fence. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4608	CAMRY	2008	2/3/2010	Customer called regarding his 2008 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle surged and shifted irregularly. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4609	CAMRY	2008	2/3/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer seeks compensation for the time required to repair vehicle.
4610	CAMRY	2010	2/3/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on October 7, 2009, while turning into a service station with his foot lightly on the brake, the engine surged and vehicle jumped forward and ran into the service station. Customer further claims that a similar surge happened two other times when coming to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4611	MATRIX	2009	2/3/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date in November 2009 and on January 21, 2010, the vehicle accelerated on him. Customer further claims that the brakes made a loud clanking sound.
4612	CAMRY	2009	2/3/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date, she was driving and the vehicle began to accelerate, causing her to lose control of the vehicle and hit an emergency rail.
4613	CAMRY	2008	2/3/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 12/30/09, while trying to park her vehicle and driving in reverse, the vehicle accelerated by itself and caused her to hit 2 other vehicles. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4614	COROLLA	2009	2/3/2010	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on February 3, 2010, he was parking the vehicle with foot slightly on the brake pedal when the engine accelerated and the vehicle surged forward, hitting some bushes and plants. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4615	CAMRY	2007	2/3/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that January 3, 2010 her vehicle accelerated, causing her to land in a ditch. Customer further claims that accident occurred during bad weather and that because of the snow she released the gas and brake pedal at the same time. Customer claims that she was traveling at a rate of 25 mph around a corner when the acceleration occurred. Customer alleges that the sudden acceleration occurred while the vehicle was in motion.
4616	CAMRY	2008	2/4/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 2/2/2010, she was driving around a curve at 10-15 mph and drove straight, hitting a pole, because she was unable to brake.
4617	CAMRY	2007	2/4/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically, customer claims that on April 26, 2009 his vehicle accelerated, causing him to rear end the vehicle in front of him. Customer further claims that accident occurred as he was traveling at a speed of 10-15 mph and switching lanes in traffic. Customer alleges that he went to hit the brake but the vehicle accelerated. Customer further alleges that this is not the first time this has happened. Customer alleges that the sudden acceleration occurred while the vehicle was in motion.
4618	CAMRY	2007	2/4/2010	Customer called regarding her 2007 Toyota Camry CE. Specifically customer claims that on January 22, 2010 his vehicle jolted forward, causing the car to accelerate on its own. Customer alleges that the sudden acceleration occurred while the vehicle was in motion.
4619	RAV 4	2009	2/4/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle experiences sudden unintended acceleration, but fails to specify a date. FTS did not inspect the vehicle. It is unknown if the acceleration issues occur while the vehicle is already in motion.
4620	CAMRY	2007	2/4/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on February 3, 2010, her vehicle suddenly lunged forward while she was pulling slowly into an alleyway, causing her vehicle to crash into the back of her house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4621	CAMRY	2009	2/4/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 3/20/10 her son was driving when the vehicle just went forward resulting in a collision. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4622	COROLLA	2010	2/4/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on two unknown dates he was driving up a hill and took his foot off the gas pedal and the vehicle began to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4623	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on January 10, 2010, while driving the vehicle in a parking lot the vehicle suddenly accelerated and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4624	MATRIX	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on January 27, 2010, her husband came to a stop and then turned a corner, and after the turn the vehicle accelerated and took off, and side swiped another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4625	CAMRY	2007	2/4/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 1/20/2010 he received a speeding ticket because the vehicle accelerated on its own while driving uphill despite applying the brakes.
4626	PRIUS	2005	2/4/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on 4/19/09, the vehicle unintentionally accelerated and hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4627	MATRIX	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date, the vehicle accelerated on its own, causing him to rear-end another vehicle. Customer further claims that this happened as he was slowing down almost to a stop and took his foot off of the gas to hit the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4628	AVALON	2008	2/4/2010	Customer called regarding his 2008 Toyota Avalon Touring. Specifically, customer claims that on February 3, 2010, her vehicle would not stop as she was approaching a red light. Customer claims that the accident was due to the gas pedal sticking. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4629	COROLLA	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on December 6, 2009, customer's husband was driving the vehicle into their home entrance and the vehicle began to accelerate and ran into the neighbor's garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4630	CAMRY	2009	2/4/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 1/26/2010, he was backing up his vehicle when it accelerated, causing him to hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4631	COROLLA	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she was stopped at a red light and the vehicle revved, so the customer put it in neutral and turned off the engine. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4632	TACOMA	2009	2/4/2010	Customer called regarding her 2009 Toyota Tacoma. Specifically, customer claims that, on unknown dates, she was driving at 25 mph with her foot lightly on the gas pedal but the vehicle accelerated more than it should have. Customer further claims she could feel the gas pedal going down by itself and that she applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4633	COROLLA	2010	2/4/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 4, 2010, she was driving and the vehicle revved like she was flooring the vehicle, started accelerating and nearly hit a bus. Customer further claims that on an unknown date while driving at a low speed the brakes did not work. Customer further claims that on unknown dates in February 2010 she continued to experience accelerator issues after the SSC AOA recall was performed. Customer further claims that on an unknown date in February 2010 she was approaching a yellow light and the brakes were not working and the vehicle continued to accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4634	TACOMA	2008	2/4/2010	Customer called regarding her 2008 Toyota Tacoma. Specifically, customer claims that on an unknown dates the vehicle experienced unintended acceleration while her husband was driving. Customer further claims that the vehicle continued to have acceleration problems after the floor mats were removed.
4635	PRIUS	2007	2/4/2010	Customer called in regarding a 2007 Toyota Prius. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on 12/22/2009. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4636	RAV 4	2010	2/4/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that in December 2009 the vehicle accelerated to 70 mph and jumped when she hit the brakes while driving downhill at 65 mph with the cruise control on. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4637	PRIUS	2009	2/4/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4638	COROLLA	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 2, 2010, customer's husband was driving and ran over a curb and over a stop sign, but was traumatized and could not remember what happened.
4639	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on December 6, 2009, when entering garage the vehicle continued to speed up and hit the neighbor's wall in front of him. Customer further claims that he pressed brakes but the vehicle lurched and continued forward. Customer further claims when he stepped on the brake, rpm was very high, over 1000. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4640	PRIUS	2009	2/4/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 1/20/10, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4641	COROLLA	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on December 18, 2009, she was driving and was involved in an accident but is not sure whether it was due to the pedal sticking or the brake concern.
4642	AVALON	2005	2/4/2010	Customer called regarding 2005 Avalon. Specifically, customer claims that on unknown dates, he has experienced acceleration problems.
4643	AVALON	2008	2/4/2010	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on September 1, 2009, he was entering the highway at approximately 35-40 miles per hour when he felt that the vehicle accelerated by itself. Customer claims that he was able to stop the vehicle by applying the brakes for approximately one and a half minutes. Customer feels that the issue is not related to floor mats.
4644	COROLLA	2009	2/4/2010	Customer's daughter called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated on its own.
4645	AVALON	2006	2/4/2010	Customer called regarding his 2006 Toyota Avalon. Specifically, customer claims that on December 5, 2007 the vehicle accelerated unintentionally after he started it up and put it in drive while backing out of a parking space, causing him to run into a lamp post. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4646	AVALON	2007	2/4/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle had an RPM surge for 1 to 2 seconds. Customer further claims that on an unknown date the vehicle's engine surged to approximately 2000 RPM while she was stopped at a light, and that she had to press harder on the brakes to keep the vehicle from moving. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4647	PRIUS	2004	2/4/2010	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on 10/00/09, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4648	AVALON	2005	2/4/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle lunged forward when her foot was on the brake.
4649	COROLLA	2010	2/4/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on October 14, 2009, she was backing up in a parking lot and when she touched the gas pedal the vehicle suddenly accelerated and hit the concrete. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4650	CAMRY	2010	2/4/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that in January 2010 when he was in a parking lot his accelator got stuck and the vehicle jumped, causing him to hit a lightpole.

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4651	CAMRY	2010	2/4/2010	Customer called regarding his 2010 Toyota Camry LE V6. Specifically, customer claims that on unknown dates, his vehicle surged at a stop sign or light. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4652	CAMRY	2009	2/4/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer seeks information about her options to request a buy back or replacement vehicle from Toyota.
4653	TUNDRA	2007	2/4/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle was in an accident related to an accelerator concern. Customer further claims that his local dealer received a replacement pedal part for his vehicle, and he wanted to know if it was related to the recall.
4654	CAMRY	2007	2/4/2010	Customer called regarding her 2007 Toyota Camry. Specifically customer claims that [on an unknown date] she experience unintended acceleration. Customer claims that when she presses on the accelerator it is delayed and then it jumps. Customer further claims that she has experienced this problem intermittently since she purchased the vehicle.
4655	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on October 3, 2008, customer's wife was pulling into a parking spot and the vehicle accelerated and went over the cement block and slammed into the neighbor's house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4656	ES350	2008	2/4/2010	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on unknown dates, while driving, she took her foot off the gas and the vehicle accelerated. Customer claims that she tried to put the brakes on, but she hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4657	CAMRY	2009	2/4/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on November 15, 2009, when his wife was parking the vehicle, she depressed the accelerator pedal but it got stuck and the vehicle kept moving, causing it to jump and hit a building.
4658	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date he was driving on a dirt road and could not stop and hit a mail post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4659	CAMRY	2010	2/4/2010	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer claims that on January 23, 2010, his vehicle took off when he was at a stop sign, causing him to hit the side of another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4660	PRIUS	2008	2/4/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4661	COROLLA	2010	2/4/2010	Customer's attorney's office called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle sustained damage due to a stuck accelerator pedal.
4662	COROLLA	2009	2/4/2010	Customer emailed regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle accelerated to twice the speed customer was driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4663	COROLLA	2009	2/4/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date she experienced unintended acceleration.
4664	CAMRY	2007	2/4/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle suddenly accelerated while he was using the cruise control. Customer called again claiming that he noticed the same problem on a later date.
4665	PRIUS	2005	2/4/2010	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4666	AVALON	2007	2/4/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on January 15, 2010, he was turning into his garage when the vehicle accelerated and hit a brick wall. Customer further claims that there was a small amount of damage to the front fender. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4667	HIGHLANDER	2009	2/4/2010	Customer called regarding his 2009 Toyota Highlander Ltd. Specifically, customer claims that on unknown dates the vehicle sped up when he went from the pedal and brake and let up on the brake.

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4668	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on January 17, 2010, his vehicle suddenly jumped and accelerated when he was pulling into the driveway, causing him to crash slightly into his house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4669	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on February 4, 2010, he was approaching an intersection at about 20 mph and applied the brakes, but the vehicle accelerated and hit the vehicle in front of him. A Field Technical Specialist failed to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4670	CAMRY	2007	2/4/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on seven or eight occasions, dates unknown, the vehicle feels like it wants to accelerate on its own.
4671	TUNDRA	2007	2/4/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle took off after going over a speed bump. Customer further claims that he collided with another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4672	PRIUS	2007	2/4/2010	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4673	PRIUS	2004	2/4/2010	Customer called regarding her 2004 Toyota Prius. Specifically, customer claims that on February 2, 2010, she was coasting to a stop when the vehicle lunged forward and accelerated out of control and ran into railroad ties. Customer further claims that the vehicle stopped when she slammed on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4674	TUNDRA	2007	2/4/2010	Customer called regarding her 2007 Toyota Tundra 4x4. Specifically, customer claims that on January 22, 2010 the vehicle was in an accident that customer feels was due to the vehicle's acceleration. Customer further claims that on an unknown prior date the vehicle was in an accident that customer also feels was due to the vehicle's acceleration.
4675	TACOMA	2009	2/4/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on February 3, 2010 the vehicle kept accelerating after he let off the accelerator. Customer further claims that the vehicle pulled up and accelerated to 80 mph before he shifted it into neutral and braked, which stopped the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4676	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on September 25, 2009, customer was parking when the vehicle accelerated and hit a wall. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4677	IS250	2008	2/4/2010	Customer called regarding her 2008 Lexus IS 250. Specifically, customer claims that on unknown dates, the vehicle accelerates on its own and continues to accelerate while in park. Customer further claims that she has to slam on the brakes to get the vehicle to stop or she needs to put it into neutral.
4678	COROLLA	2009	2/4/2010	Customer's attorney called regarding his 2009 Toyota Corolla STD. Specifically, customer claims that on and unknown date he was driving approximately 60mph on the highway when the vehicle just kept accelerating, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4679	PRIUS	2008	2/4/2010	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into her garage. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4680	RAV 4	2009	2/4/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on January 1, 2010 the vehicle took off when she was slowly parking in front of her house, causing her to run into her daughter's parked vehicle. Customer further claims that she slammed the brakes and put on the emergency brake. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4681	CAMRY	2007	2/4/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle surged as he was going down a hill. Customer further claims that his vehicle accelerated after he took his foot off of the accelerator. Customer alleges that when he starts the vehicle and the engine is cold, the engine will surge for a short time. Customer further alleges that the sudden acceleration occurred while the vehicle was in motion.
4682	CAMRY	2007	2/4/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that [on an unknown date] his vehicle jumps when he puts his foot on the accelerator pedal.

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4683	TACOMA	2010	2/4/2010	Customer called regarding 2010 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle would continue to move even when he was pressing on the brake. Customer further claims that he braked to stop at a red light but the vehicle lurched forward. Customer states that he has to press harder and harder on the brake pedal to get the vehicle to stop. Customer claims that sudden acceleration occurs when the vehicle is at a full stop.
4684	TUNDRA	2008	2/4/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that in January 2010, the vehicle accelerated suddenly. The specifics of the incident are unknown.
4685	TACOMA	2008	2/4/2010	Customer called regarding his 2008 Toyota Tacoma PreRunner L/B. Specifically, customer claims that in January 2010 the vehicle accelerated on its own after he came to a stop. Customer further claims that he experienced the same concern twice before. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4686	TUNDRA	2010	2/4/2010	Customer called regarding her 2010 Toyota Tundra 4x2. Specifically, customer claims that on unknown date, but some time near Christmas of 2009, her vehicle lurched backwards, causing her to collide with a post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4687	CAMRY	2009	2/4/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer seeks information about the recall.
4688	TUNDRA	2007	2/4/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on January 28, 2009, his wife was stopped when the vehicle jumped forward as she pressed the gas pedal, causing her to collide with a pole. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4689	CAMRY	2009	2/4/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 2/3/2010, his mother was backing out of a parking spot when the vehicle automatically accelerated, hitting a fire hydrant. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4690	TUNDRA	2010	2/4/2010	Customer called regarding his 2010 Toyota Tundra 4x2. Specifically, customer claims that in January 2010 the vehicle accelerated on its own while his son was driving. Customer further claims that no one has driven the vehicle since the incident.
4691	TUNDRA	2008	2/4/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that he was reversing out of his garage when the vehicle surged and hit another truck. Customer claims that sudden acceleration occurred when vehicle was already in motion.
4692	TACOMA	2007	2/4/2010	Customer called regarding her 2007 Toyota Tacoma PreRunner L/B. Specifically, customer claims that in November 2009 the vehicle accelerated on its own while she was trying to park at around 5 mph. Customer further claims that she pressed on the brakes but that it was too late and the vehicle collided with a building wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4693	COROLLA	2010	2/4/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on January 30, 2010, he was driving in a parking lot attempting to stop when the vehicle accelerated, causing him to swipe a tree. Customer further claims that when he applied the brakes, the vehicle accelerated more and only stopped when he forced it into park. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4694	COROLLA	2009	2/4/2010	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on various unknown dates the vehicle begins to speed up on its own and then stop. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4695	COROLLA	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on 10/15/09 she was stopped, about to make a left turn when the vehicle suddenly began to spin, resulting in a collision.
4696	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry. Specifically customer claims that on February 4, 2010 his vehicle lurched backward as he was reversing out of his driveway, causing him to hit his daughter's car. Customer further claims that a few weeks later his vehicle began to suddenly accelerate at a rate of 40 mph. Customer alleges that it maintained this speed for about one minute and he never put his foot on the brake. Customer further alleges that both incidents occurred while the care was in motion.

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4697	RAV 4	2009	2/5/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated when he was coasting into his driveway, causing him to run into the garage door. Customer further claims that the vehicle would not slow down when he pressed the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4698	CAMRY	2008	2/5/2010	Customer call regarding his 2008 Toyota Camry CE. Specifically, customer claims that on November 30, 2008, the vehicle that the vehicle lunged forward while he was pressing the brake. Customer further claims that the vehicle accelerated on its own and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4699	TACOMA	2010	2/5/2010	Customer called regarding 2010 Toyota Tacoma Prerunner. Specifically, customer claims that the vehicle has been "rushing." The particulars of the underlying incident(s) are unclear.
4700	CAMRY	2009	2/5/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that in August 2009 her gas pedal got stuck and her vehicle jerked when she was pulling into a parking spot, causing her to hit a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4701	CAMRY	2009	2/5/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/4/10, she was approaching a red light and released the gas pedal to apply the brake, but the vehicle kept accelerating. Customer further claims that this caused her to hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4702	CAMRY	2009	2/5/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates he had issues where the vehicle accelerated even though he did not have his foot to the gas pedal.
4703	AVALON	2005	2/5/2010	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that on unknown dates she had concerns about her vehicle surging.
4704	MATRIX	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on February 5, 2010, she was pulling into the parking garage and the vehicle accelerated and hit the wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4705	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that sometime in the summer of 2009 the gas pedal got stuck and the vehicle kept moving despite applying the brakes.
4706	CAMRY	2009	2/5/2010	Customer called regarding his 2009 Toyota Camry XLE. Specifically, customer claims that on various unknown dates, when its cold in the morning, the vehicle wants to drive off on its own. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4707	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry. Specifically customer claims that [on an unknown date] her vehicle would begin to surge. Customer further claims that at times her vehicle has problems re-accelerating after shifting.
4708	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry. Specifically customer claims that [on unknown dates] she has experienced concerns with acceleration. Customer further claims that when she takes her foot off the gas she can feel the vehicle sped up.
4709	TACOMA	2009	2/5/2010	Customer called regarding her 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle accelerated and leaped forward while her father was trying to park in a garage, causing him to run into a tree and a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4710	AVALON	2006	2/5/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while coming to a stop sign, the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4711	VENZA	2009	2/5/2010	Customer called regarding 2009 Venza. Specifically, customer claims that on October 17, 2009 she was driving the vehicle and the vehicle surged forward and did not stop despite the fact that she applied the brakes. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
4712	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates her vehicle lurched forward.
4713	PRIUS	2007	2/5/2010	Customer called regarding his 2007 Toyota Prius. Specifically, the customer claims that on 11/5/08, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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4714	PRIUS	2006	2/5/2010	Customer called regarding his 2006 Toyota Prius. Specifically, customer claims that on January 15, 2010, he was pulling into a parking space when the vehicle surged forward and hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4715	COROLLA	2009	2/5/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date in June 2009, customer's wife was pulling into a parking space when the vehicle surged forward, went over the parking bumper, ran through a fence and ended up in a ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4716	RAV 4	2009	2/5/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4717	CAMRY	2010	2/5/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on 12/31/09 he was stopped in the vehicle, and as he began to accelerate the vehicle took off, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4718	CAMRY	2009	2/5/2010	Customer called regarding her 2009 Toyota Camry XLE V6. Specifically, customer claims that on an unknown date she felt a jerking every time she depressed the accelerator pedal in her vehicle. Customer further claims that her vehicle jerked forward a little when she came to a stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4719	PRIUS	2006	2/5/2010	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into another vehicle. FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4720	CAMRY	2008	2/5/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date in 2008 his girlfriend was in an accident.
4721	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that [on an unknown date] his vehicle lurched forward, causing him to crash into the parked car in front of his vehicle. Customer further claims that at the time of the accident he was pulling out of a parking spot and after he removed his foot from the brake his vehicle lurched forward.
4722	CAMRY	2010	2/5/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on an unknown date his wife has experienced the accelerator pedal sticking. Customer further claims that when his wife was at a stop sign the vehicle acted as if it wanted to shoot out.
4723	CAMRY	2008	2/5/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 2/26/09, he was turning into a parking lot and was pressing on the brake when the vehicle accelerated, causing the vehicle to go over the cement barrier and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4724	MATRIX	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on August 2, 2008, her vehicle accelerated as she was pulling into a parking space, causing her to collide with a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4725	CAMRY	2009	2/5/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date his vehicle accelerated when the carpet got stuck on the pedal.
4726	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on unknown dates he was in two accidents that he believes were caused by unintended acceleration. Customer further claims that just before the first accident he was driving about 5 mph and when he pressed on the brakes they made a screeching noise and his vehicle stopped about 1 to 2 feet into the street, causing his vehicle to be hit by another vehicle. Customer further claims that just before the second accident occurred his vehicle was at a stop when it lurched forward hit another vehicle at a high speed.
4727	AVALON	2005	2/5/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on December 27, 2007 the vehicle lunged forward and wedged over a snow bank when she was pulling into a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4728	TUNDRA	2007	2/5/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that she gets surges of speed in her vehicle. Customer states that she did not think anything of it until she heard of the Toyota recall.
4729	CAMRY	2009	2/5/2010	Custoemr called regarding her 2009 Toyota Camry. Specifically, customer claims that on January 28, 2010, she was driving in a parking lot and took her foot off the accelerator when the vehicle accelerated, causing her to run into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4730	TUNDRA	2008	2/5/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle revved up while approaching a stop light and then dropped off. Customer further claims that this has happened a few times and that he heard a clunk. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4731	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 11/28/2009 she was stopped at a read light when the vehicle took off and struck an oncoming truck. Customer's husband further claims that vehicle has high RPM's and is difficult to brake.
4732	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he experienced an unintended acceleration on his vehicle, but believes that he may have pressed both the brakes and the gas pedal at the same time.
4733	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that on September 4, 2009 his vehicle suddenly jerked forward causing him to crash into the vehicle in front of him. Customer further claims that the accident occurred while he was at a stop light with his foot lightly pressed upon the brake pedal.
4734	CAMRY	2009	2/5/2010	Customer's wife called regarding his 2009 Toyota Camry. Specifically, customer's wife claims that on an unknown date she was trying to park and as she braked the vehicle accelerated instead, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4735	AVALON	2007	2/5/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on unknown dates she has previously had "acceleration concerns."
4736	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry. Customer provides no specifics, but claims that vehicle has acceleration problems and refuses to drive the vehicle.
4737	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that on February 4, 2010 Her vehicle jumped and jolted, causing her to accelerate and drive over the rubble strip. Customer further claims that the engine revved. Customer alleges that the incident occurred while the vehicle was already in motion.
4738	TUNDRA	2007	2/5/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle accelerated without any pedal being pressed while he was driving in the rain. Customer further claims that the vehicle skidded and went straight for 30 seconds, then stopped, then accelerated again up to 80 mph. Customer claims that he could not put the vehicle into neutral and that he shut the ignition off to stop the vehicle. Customer further claims that the power steering was not functioning. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4739	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on two occasions, July 2009 and January 2010, he was pulling vehicle onto the street and the vehicle continued to accelerate, both times resulting in a collision.
4740	SEQUOIA	2008	2/5/2010	Customer called regarding her 2008 Toyota Sequoia. Specifically, customer claims that in October 2009 the vehicle experienced unintended acceleration while she was rolling down the window to swipe out of her work's parking lot. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4741	COROLLA	2009	2/5/2010	Customer called regarding his 2009 Toyota Corolla LE. Specifically, customer claims that on an unknown date he was driving approximately 30 mph when the vehicle accelerated on its own and continued to do so until he shifted into neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4742	COROLLA	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla STD. Specifically, customer claims that on December 12, 2009, the vehicle took off when her husband was pulling into a parking lot, causing him to hit a brick wall. Customer further claims that on multiple occassions she has experienced unintended acceleration in her vehicle and at times her brakes would drop to the floor and would not stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4743	COROLLA	2009	2/5/2010	Customer called regarding his 2009 Toyota Corolla S. Specifically, customer claims that on an unknown date he was slowly backing out of a driveway with his foot on the brake, but the gas pedal got stuck, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4744	AVALON	2009	2/5/2010	Customer called regarding his 2009 Toyota Avalon. Specifically, customer claims that on unknown dates the vehicle surged forward while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4745	COROLLA	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla STD. Specifically, customer claims that on unknown dates she has had 3-4 accidents in this vehicle. Customer further claims it was due to the vehicle accelerating. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4746	TACOMA	2005	2/5/2010	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle surged forward.
4747	CAMRY	2007	2/5/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in January 2010 his vehicle unintentionally accelerated while he was exiting the freeway.
4748	IS250	2009	2/5/2010	Customer called regarding his 2009 Lexus IS 250. Specifically, customer claims that on an unknown date, his vehicle moved after he stopped.
4749	MATRIX	2009	2/5/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date she was involved in an accident due to unintended acceleration.
4750	CAMRY	2007	2/5/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that on November 5, 2009 when she pressed the brake pedal her vehicle would surge. Customer further claims that the vehicle light came on. Customer alleges that she encountered the same problem again.
4751	PRIUS	2008	2/5/2010	Customer called regarding his 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4752	TUNDRA	2008	2/5/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on February 4, 2010 the vehicle experienced unintended acceleration from 20 mph up to 40 mph. Customer further claims that the vehicle had experienced unintended acceleration on an unknown date before July 2009. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4753	COROLLA	2009	2/5/2010	Customer called regarding his 2009 Toyota Corolla STD. Specifically, customer claims that on 7/28/09 he was driving approximately 30mph approaching an intersection. He applied the brakes but the pedal went to the floor and the vehicle did not stop, resulting in a collision.
4754	CAMRY	2007	2/6/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that on January 29, 2010 his vehicle suddenly lunged forward, causing him to jump a curb. Customer further claims that at the time of the incident he was pulling into a parking spot traveling at a rate of 0-2 mph when the vehicle suddenly revved and lunged forward at a rate of 60 mph.
4755	CAMRY	2008	2/6/2010	Customer emailed regarding his 2008 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle unintentionally slowed down from 40 mph to 10 mph.
4756	COROLLA	2010	2/6/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on January 6, 2010, he was backing up and took his foot off the accelerator and the vehicle accelerated and hit a small pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4757	PRIUS	2007	2/6/2010	Customer called regarding his 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4758	AVALON	2009	2/6/2010	Customer called regarding her 2009 Toyota Avalon. Specifically, on an unknown date she slowed down to park the vehicle and when she went to depress the brake, the motor raced and the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4759	CAMRY	2007	2/6/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims he has experienced unintended acceleration and that he does not feel safe driving the vehicle, and that in November 2007 he was involved in an accident in which his vehicle ran off the road.

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4760	CAMRY	2009	2/6/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on multiple unknown dates the vehicle stutters when she eases on the accelerator coming out of a complete stop. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4761	CAMRY	2007	2/6/2010	Customer called regarding his 2007 Toyota Camry. Customer does not provide specifics, but claims that the vehicle has acceleration problems since he purchased it in 2007 and that his wife does not feel safe driving the vehicle.
4762	CAMRY	2007	2/6/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/02/2010 her vehicle struck a fire hydrant after she applied the brakes but the vehicle would not stop.
4763	CAMRY SOLARA	2007	2/6/2010	Customer called regarding his 2007 Toyota Camry Solara SLE V6. Specifically, customer claims that on an unknown date, he was pulling his vehicle into the garage and then the vehicle just jumped and caused customer to hit a wall in the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4764	RAV 4	2009	2/6/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle experiences abnormal acceleration.
4765	CAMRY	2009	2/6/2010	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on various unknown dates the vehicle felt like it sped up for a second. Customer further claims the vehicle sometimes jerks when slowing down. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4766	COROLLA	2009	2/6/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that in February 2009 she was in a parking lot when the vehicle started to accelerate; she applied the brakes but the vehicle did not stop, resulting in a collision. Customer further claims she heard the engine still revving after hitting the fence. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
4767	CAMRY	2007	2/6/2010	Customer called regarding his 2007 Toyota Camry. Without providing specifics, customer claims that on 1/15/2010 he was involved in an accident and wants Toyota to accept fault so that his insurance rates do not increase.
4768	MATRIX	2009	2/6/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on December 22, 2009, she was pulling into a parking space at about 5 mph when the vehicle suddenly accelerated and slammed into the wall of the parking structure. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4769	CAMRY	2008	2/6/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 2/02/2010 the vehicle accelerated when she applied the brakes and rearended another vehicle.
4770	PRIUS	2005	2/6/2010	Customer called regarding his 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4771	TUNDRA	2008	2/6/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on February 25, 2010 the vehicle accelerated when he backed it up his driveway. Customer further claims that he applied the brakes and the vehicle did not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4772	PRIUS	2008	2/8/2010	Customer called regarding his two 2008 Toyota Prius Hybrids. Specifically, customer claims that on unknown dates, when putting foot on the brakes when cruise control is engaged, both vehicles surged ahead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4773	TUNDRA	2007	2/8/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle was involved in an accident related to SSC A0A.
4774	PRIUS	2008	2/8/2010	Customer called regarding both of their 2008 Toyota Prius. Specifically, customer claims that on, unknown date(s), the vehicle(s) suddenly surges while driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4775	RAV 4	2010	2/8/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle revved when she hit the brakes while coming to a complete stop.
4776	TACOMA	2008	2/8/2010	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims, on unknown dates, his accelerator stuck on two occasions and that he has no confidence in the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4777	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on February 5, 2010, while she was driving on the interstate her vehicle began to accelerate in reverse, causing her vehicle to do a 360 spin and run up a hill in reverse. Customer further claims that in January 2009, she was coming to a stop behind a bus but was unable to stop her vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4778	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/05/2010 while pulling into a parking lot her vehicle made a roaring sound and accelerated into a wall while she had her foot on the brake pedal. A Field Technical Specialist (FTS) inspected the vehicle.
4779	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on February 8, 2010, she felt an ice spot in the road and lost a little control, pressed the brakes, but the vehicle would not stop and she was in an accident that damaged the front, rear, and passenger side of the vehicle and cost \$13,000 to repair. Customer further claims that prior to the accident, she had removed the floor mats and replaced them with aftermarket mats. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4780	COROLLA	2009	2/8/2010	Customer called regarding his 2009 Toyota Corolla S. Specifically, customer claims that on February 2, 2010 customer was approaching a stop sign, and while slowing down, customer hit a pothole and vehicle accelerated, hitting a vehicle in front. Customer further claims that he hit the brakes, but the vehicle did not stop. Customer further claims that he put the vehicle into neutral and shut off the brakes and the vehicle was still revving high. Customer further claims that he has a witness in the driver of the other vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4781	CAMRY	2007	2/8/2010	Customer emailed regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle revved up really high and asks whether this problem is related to the recall.
4782	COROLLA	2010	2/8/2010	Customer called regarding his 2010 Toyota Corolla LE. Specifically, customer claims that on February 6, 2010, his father was parking the vehicle when it lunged forward, causing it to jump into a wall. Customer further claims that his father was not touching the gas pedal when the vehicle suddenly accelerated.
4783	CAMRY	2007	2/8/2010	Customer emailed regarding her 2007 Toyota Camry. Specifically, customer claims that in April 2007 her vehicle suddenly accelerated. Customer further claims that the pedal was not stuck as her son, who was a passenger, reached under the pedal to make sure it was not stuck and that she could not press down the brakes.
4784	TACOMA	2006	2/8/2010	Customer called regarding 2006 Toyota Tacoma Prerunner L/B. Specifically, customer claims that in September or October 2006, the vehicle almost surged into an intersection. Customer further claims that the problem occurs when she is coming to a stop, and that the vehicle surges to 500-1000 RPMs. Customer states that she has to step on the brake to get the vehicle to stop.
4785	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 1/20/2010 she was pulling into a parking space but the brakes did not stop the vehicle and she struck a wall.
4786	CAMRY	2007	2/8/2010	Customer called regarding his 2007 Toyota Camry. Customer does not provide specifics, but claims that he has experienced acceleration problem when entering the freeway.
4787	TUNDRA	2008	2/8/2010	Customer called regarding her husband's 2008 Toyota Tundra 4x2. Specifically, customer claims that on March 3, 2008 the vehicle rolled forward into another vehicle while she was stopped at a light with her foot on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4788	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] she has experienced her vehicle jerking. Customer claims that she is concerned about the recall.
4789	TUNDRA	2008	2/8/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on unknown dates the vehicle accelerated when he applied the brakes while going downhill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4790	IS350	2006	2/8/2010	Customer called regarding her 2006 Lexus IS 350. Specifically, customer claims that on an unknown date, he experienced unintended acceleration in his vehicle. Customer claims that he stopped the vehicle, and put it into park and had it towed.

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4791	TUNDRA	2007	2/8/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that on February 6, 2010 while he was at a red light, the vehicle accelerated on its own, causing a collision. Customer claims that vehicle sustained substantial damage as a result of the incident. Customer claims that sudden acceleration occurred while the vehicle was at a full stop.
4792	TUNDRA	2008	2/8/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date, but likely some time in early February 2010, his vehicle lurched forward as he was pulling into his garage, causing him to collide with the edge of the garage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4793	AVALON	2005	2/8/2010	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that in December 2006, she was driving her vehicle and when she went to apply the brakes the vehicle lunged forward, causing her to strike the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4794	PRIUS	2008	2/8/2010	Customer called in regarding a 2008 Toyota Prius. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on 1/26/2010. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was completely stopped.
4795	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 1/16/2010 she backing out of her driveway when her vehicle suddenly accelerated and hit a truck.
4796	HIGHLANDER	2008	2/8/2010	Customer called regarding his 2008 Toyota Highlander. Specifically, the customer claims that on 1/28/10 dates, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4797	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/06/2010 her vehicle suddenly accelerated and knocked down a light pole.
4798	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on February 6, 2010, she was in an accident involving sudden acceleration; customer claims that she was turning, driving at 15-20 mph, when the vehicle just went off, and she swerved to avoid hitting the 3 cars in front of her and hit the curb to stop the vehicle. Customer further claims that the floor mats had been removed prior to the accident, she was wearing a seatbelt, the airbags did not deploy, and there were no injuries. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4799	AVALON	2005	2/8/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on September 20, 2008, while driving her vehicle accelerated. Customer is not sure if she caused the accident and believes she might have made a mistake and hit the gas pedal instead of the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4800	COROLLA	2010	2/8/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on February 7, 2010, he was backing out of his driveway when the vehicle accelerated. Customer further claims that he applied the brakes but they did not work, and the vehicle went across four lanes until it crashed into a snow bank. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4801	COROLLA	2009	2/8/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date he had an acceleration concern and felt like the vehicle was not going to stop.
4802	CAMRY	2009	2/8/2010	Insurance agent called regarding customer's 2009 Toyota Camry LE. Specifically, agent claims that on January 5, 2010, when the vehicle was at a full standstill, it suddenly accelerated into the wall. Agent claims customer sustained soft tissue injury in left ankle. Agent claims that the sudden acceleration occurred while the vehicle was at a full stop.
4803	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on January 5, 2010, she was parking her car and hit the parking curb, and her vehicle came to a stop. Customer further claims that the vehicle then accelerated and hit the building. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4804	RAV 4	2009	2/8/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle experienced sudden unintended acceleration on 2/8/2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.

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4805	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown date she experienced accelerator problems.
4806	ES350	2010	2/8/2010	Customer called regarding her 2010 Lexus ES 350. Specifically, customer claims that on February 8, 2010, while pulling into a parking lot, the vehicle accelerated and she hit at brick wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4807	TUNDRA	2008	2/8/2010	Customer called regarding her 2008 Toyota Tundra 4x2. Specifically, customer claims that on June 25, 2009 the vehicle took off and its engine revved when her husband was driving. Customer further claims that her husband lost control and ran into 10 mailboxes and a ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4808	TUNDRA	2007	2/8/2010	Customer emailed regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date the vehicle's accelerator stuck. Customer further claims that on an unknown later date the same problem occurred.
4809	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry Hybrid. Specifically customer claims that [on an unknown date] she was in a driveway and despite applying the brakes she was unable to stop the vehicle.
4810	HIGHLANDER	2009	2/8/2010	Customer called regarding his 2009 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4811	COROLLA	2009	2/8/2010	Customer called regarding his 2009 Toyota Corolla STD. Specifically, customer claims that on January 21, 2010, while turning at about 30 mph, he let go of the accelerator and applied the brakes, but the vehicle kept accelerating, went over a curve, and hit a plastic trash can, causing scratches to the bumper. Customer further claims that he applied the brakes but vehicle did not stop right away. Customer further claims that the airbags did not deploy, nor did he see an airbag warning light prior to the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4812	CAMRY	2009	2/8/2010	Customer called regarding his 2009 Toyota Camry XLE V6. Specifically, customer claims that on unknown dates, but on two occasions, the vehicle has accelerated on its own. Customer does not state whether sudden acceleration occurred while the vehicle was at a full stop or in motion.
4813	PRIUS	2008	2/8/2010	Customer called regarding her 2008 Toyota Prius Touring Hybrid. Specifically, customer claims that on unknown date, when in parking lot traveling slowly, the vehicle surged forward and hit two parked vehicles head on, and would not stop despite customer applying brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4814	CAMRY	2007	2/8/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that when driving the vehicle races forward.
4815	CAMRY	2008	2/8/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle lurched forward while her foot was on the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4816	TUNDRA	2007	2/8/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle experienced sudden acceleration while in park. Customer further claims that he wants Toyota to take the vehicle back. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4817	TACOMA	2005	2/8/2010	Customer emailed regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that in December 2009 the vehicle suddenly accelerated when he was driving slowly in a cul-de-sac. Customer further claims that he was able to stop the vehicle with the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4818	CAMRY	2009	2/8/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 1/13/10 she was driving on the highway and the vehicle suddenly accelerated, resulting in a collision. Customer further claims the sudden acceleration happened once before, not resulting in an accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4819	COROLLA	2009	2/8/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 5, 2010, she was driving through an intersection and tried to stop for a left turning vehicle, but when she stepped on the brakes the accelerator pedal went in and would not return to the idle position. Her vehicle collided with the other vehicle. A Field Technical Specialist was scheduled to inspect the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4820	AVALON	2008	2/8/2010	Customer called regarding his 2008 Toyota Avalon. Specifically, customer claims that on February 4, 2010, he was backing into a parking space and had his foot on the brake, then shifted into drive and the vehicle lunged forward, striking the vehicle in front of it. Customer further claims that he had his feet on the brake and was finally able to turn the vehicle off. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4821	TUNDRA	2010	2/8/2010	Customer called regarding his 2010 Toyota Tundra 4x2. Specifically, customer claims that on February 5, 2010 the vehicle experienced unintended acceleration when he put his foot on the brake while he was accelerating into a parking space. Customer further claims that the vehicle went over a cement curb and hit an RV. Customer claims that after the accident he saw something in the area of the accelerator pedal was stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4822	COROLLA	2009	2/8/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates in October 2009, the vehicle accelerated while she was driving. Customer further claims that on an unknown date in December 2009, the vehicle suddenly accelerated while she was backing up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4823	Prius	2010	2/9/2010	Customer states that the car feels like it accelerates on bumpy roads when braking. The condition could not be duplicated. Performed a health check and found no codes present. The cause was unknown, and no repair was attempted. The vehicle was found to be operating as designed.
4824	CAMRY	2009	2/9/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates his vehicle has accelerated on its own.
4825	CAMRY	2009	2/9/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on January 2010, his wife was driving the vehicle and was involved in an accident.
4826	IS350	2006	2/9/2010	Customer called regarding his 2006 Lexus IS 350. Specifically, customer claims that on an unknown date his vehicle surged, causing no damage. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4827	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 2010 she began to slow down because the weather was getting bad, but the vehicle would not stop, resulting in a collision. Customer further claims the vehicle felt like it was floating for a few seconds when she pressed the brake, before the brake caught.
4828	COROLLA	2010	2/9/2010	Customer's father called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that the vehicle accelerated while her foot was on the brake and caused an accident.
4829	TUNDRA	2007	2/9/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle's gas pedal stuck while he was driving on a back road, causing him to run into two deer. Customer further claims that he was able to stop the vehicle by putting his foot under the gas pedal and popping it up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4830	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry CE. Specifically customer claims that on February 5, 2010 her vehicle accelerated on its own, causing her to crash into a stone wall. Customer further claims that the acceleration occurred as she was backing out a parking space after she had removed her foot from the brake pedal. Customer alleges that this is the second time her vehicle has accelerated while backing out of a parking space. Customer further alleges that the first time this happened, the vehicle accelerated through her house.
4831	CAMRY	2010	2/9/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on February 6, 2010, while pulling into her garage, the vehicle accelerated and she had to depress the brakes with both feet, and as a result, the vehicle slid and scraped against the side of the garage, scratching the rear bumper. Customer also claims that after she took it to dealer, there is a hole where the glove box lock mechanism is located. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4832	CAMRY	2010	2/9/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates she experienced surges, specifically when pulling out of a parking garage. Customer further claims that she had concern with noises from the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4833	PRIUS	2004	2/9/2010	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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4834	PRIUS	2008	2/9/2010	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated while at a stop. Customer claims that the sudden acceleration occurred while the vehicle was not in motion.
4835	PRIUS	2005	2/9/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on unknown dates after stopping at a red light and applying a little pressure on the gas, the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4836	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 12/23/2009 she rear-ended another vehicle while driving on the highway and wants to know whether the accident might be related to the recall.
4837	PRIUS	2005	2/9/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that 12/12/06, the vehicle unintentionally accelerated over a curb into shrubs. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4838	AVALON	2006	2/9/2010	Customer called regarding his 2006 Toyota Avalon Touring. Specifically, customer claims that on February 8, 2010, his engine tried to lunge forward when he applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4839	RAV 4	2010	2/9/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on an unspecified date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4840	PRIUS	2007	2/9/2010	Customer called regarding her 2007 Prius Touring Hybrid. Specifically, customer claims that on unknown date, when vehicle goes over a bump in the road, the vehicle pauses and then surges. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4841	AVALON	2005	2/9/2010	Customer called regarding her 2005 Toyota Avalon Limited. Specifically, customer claims that on September 29, 2005, while pulling into a parking lot, he was applying the brakes, but they would not stop. Customer further claims that the vehicle accelerated and then crashed into a gate and then into a mailbox. Customer further claims that there was a second incident involving his wife. Customer claims that that his wife put her foot on brakes but the vehicle moved forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4842	PRIUS	2005	2/9/2010	Customer called regarding her 2005 Toyota Prius. Specifically, customer claims that on August 12, 2009, she was parking her vehicle when the vehicle surged forward, jumped a curb and hit a tree.
4843	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on February 9, 2009, her accelerator pedal stuck and her RPMs started to race and her accelerator pedal was to the floor. Customer further claims that when she turned her vehicle on later the engine's RPMs raced up again like a race car.
4844	TACOMA	2006	2/9/2010	Customer called regarding 2006 Toyota Tacoma Prerunner L/B. Specifically, customer claims that the vehicle sometimes revs up and leaps forward.
4845	COROLLA	2010	2/9/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle made a sound when he applied the brakes as well as the gas pedal. Customer further claims that the vehicle traveled faster than he wanted it to.
4846	TACOMA	2007	2/9/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused two accidents in 2009. FTS did not inspect the vehicle. It is unknown if the vehicle was in motion at the time the claimed accidents occurred.
4847	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/4/2010 she was backing up her vehicle in her driveway when the vehicle accelerated and struck another vehicle. Customer further claims that she experienced unintended accelerations three times prior to the accident.
4848	VENZA	2009	2/9/2010	Customer called regarding her 2009 Toyota Venza. Specifically, customer claims that on an unknown date the vehicle accelerated on its own while she was at a stop sign, causing her to hit another vehicle. Customer further claims that she was unable to stop the vehicle by pressing the brakes. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4849	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] his vehicle surged as he was turning into his driveway, causing him to hit his house and a parked car. Customer alleges that the incident occurred while the vehicle was in motion.

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4850	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically, customer claims that on an unknown date his vehicle surged as he was entering his driveway causing him to crash into his garage and another vehicle. Customer alleges that the incident occurred while the vehicle was already in motion.
4851	PRIUS	2009	2/9/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that unknown dates, the vehicle unintentionally accelerated. FTS inspected vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4852	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 9, 2010, customer's husband was driving downhill without his foot being on the gas pedal and the vehicle's RPMs went up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4853	TUNDRA	2007	2/9/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that his vehicle lunged forward when he pressed the brakes. Customer further claims that the vehicle has jumped forward in this manner ever since he bought the vehicle.
4854	COROLLA	2009	2/9/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that he was tired of all the recalls and wanted to pursue arbitration to have Toyota buy the vehicle back.
4855	AVALON	2006	2/9/2010	Customer called regarding his 2006 Toyota Avalon XL. Specifically, customer claims that on unknown dates, he experienced seven to nine unintended accelerations. Customer's main complaint was that he took his vehicle to the dealer multiple times.
4856	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date her vehicle accelerated on its own.
4857	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 6/12/2009 his vehicle suddenly accelerated when he put it in reverse and collided with two cars parked behind him. Customer claims that the sudden acceleration occurred when the vehicle was at a full stop.
4858	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that on January 19, 2010 he could not control his vehicle, causing him to crash into a tree and guardrail before flipping over. Customer further claims that either the brakes failed or the accelerator pedal stuck. Customer alleges that the incident occurred while the vehicle was in motion.
4859	COROLLA	2009	2/9/2010	Customer's wife emailed regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, he was attempting to brake to make a turn when he hit an oncoming vehicle.
4860	CAMRY	2009	2/9/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on February 8, 2010, he was exiting a parking structure and shifted into drive and pressed the accelerator to move forward slightly when the vehicle surged and hit a pole.
4861	AVALON	2005	2/9/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on an unknown date, she experienced unintended acceleration.
4862	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates she had concerns about her pedal, as well as her computer and transmission.
4863	PRIUS	2008	2/9/2010	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date, she was backing out of a parking spot and suddenly the vehicle shot forward and to the left, hitting the vehicle in the next space in front. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4864	AVALON	2005	2/9/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on December 29, 2007, after backing out of a parking space, and then attempting to go forward, the vehicle accelerated forward and hit a concrete barrier.
4865	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry. Customer does not provide specifics, but claims that he has experienced sudden acceleration three times.
4866	AVALON	2005	2/9/2010	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that on two separate occasions, he experienced unintended acceleration. The accidents allegedly occurred on August 17, 2009 and on October 12, 2009. Customer claims that when she stepped on the brake pedal the vehicle sped up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4867	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 25, 2010, she was stopped in a parking lot with her foot on the brake when the vehicle suddenly accelerated on its own. Another vehicle drove around her and hit her vehicle on the driver's side. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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4868	ES350	2008	2/9/2010	Customer called regarding her 2008 Lexus ES 350. Specifically, customer claims that on an unknown date about a year and a half before February 9, 2010, while in a car wash, his vehicle accelerated into a wall. Customer claims that he put the vehicle in park, paid for the car wash, then proceeded slowly when the vehicle accelerated.
4869	ES350	2008	2/9/2010	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on an unknown date his vehicle surged while pulling into a parking spot, causing him to jump the curb and crash into a restaurant. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4870	AVALON	2008	2/9/2010	Customer called regarding her 2008 Toyota Avalon Limited. Specifically, customer claims that she has had some shifting concerns.
4871	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry. Specifically customer claims that [on an unknown date] she was pulling into a parking spot with her foot on the brake when the vehicle suddenly surged, causing her to drive over a bumper block and crash into a fence.
4872	ES350	2008	2/9/2010	Customer called regarding his 2008 ES 350. Specifically, customer claims that on or about February 9, 2010, while pulling into a self-serve carwash, the vehicle accelerated. Customer claims that he hit the retaining wall causing his wife to be taken to the hospital with whiplash. Customer claims that the sudden acceleration occurred while the vehicle was just starting to move.
4873	PRIUS	2005	2/9/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that 09/00/08, the vehicle unintentionally accelerated into a construction sign. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4874	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that in April or May of 2009 his vehicle suddenly accelerated, causing him to hit another vehicle. Customer claims that at the time of the accident he was traveling on a small street at a rate of 35 mph when the vehicle suddenly jerked forward. Customer alleges that after the accident the engine continued to run like crazy. Customer alleges that the accident occurred while the vehicle was in motion.
4875	MATRIX	2009	2/9/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on two unknown dates the vehicle accelerated an additional 20 mph while he was driving at highway speeds. Customer further claims that on an unknown date his wife was inching out of a parking lot and the vehicle accelerated into an intersection. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4876	COROLLA	2010	2/9/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on February 8, 2010, he was driving in traffic at about 5 mph on the highway and the vehicle accelerated to 15 mph and hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4877	AVALON	2006	2/9/2010	Customer called regarding his 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, while his wife was driving down the expressway her accelerator became stuck. Customer claims that they brought the vehicle to the dealer and had to buy another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4878	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that on February 7, 2010, her vehicle began to surge and the engine began to rev as she was approaching an intersection, causing her to swerve to avoid other cars and ultimately crash into a curb. Customer further claims that at the time of the accident she was traveling at a rate of 50 mph and that although she pressed the brake pedal the vehicle would not come to a stop. Customer alleges that the accident occurred while the vehicle was in motion.
4879	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry SE. Specifically, customer claims that on January 20, 2009, he was driving approximately 25-20 mph when his vehicle suddenly accelerated when he applied the brakes causing him to hit the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4880	CAMRY	2009	2/9/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/8/2010, she was driving on a highway at approx. 65mph and after changing lanes, had to hit the brakes very quickly because the vehicle ahead of hers stopped all of sudden. Customer further claims that she believes the pedal got stuck, and that the pedal has jumped a few times previous to the accident. She ended up rear-ending the vehicle in front of hers.

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4881	TACOMA	2007	2/9/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused two accidents in 2010. FTS did not inspect the vehicle. It is unknown if the vehicle was in motion at the time the claimed accidents occurred.
4882	CAMRY	2009	2/9/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle experienced unexpected sudden acceleration and was in an accident.
4883	CAMRY	2009	2/9/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 10/2008 she was driving in a parking lot, noticed a pole in front and pressed the break but felt the vehicle slip. Customer further claims that prior to the accident her boyfriend noticed the car brakes were taking a long time to respond. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4884	COROLLA	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on July 8, 2009, she was slowly pulling into a parking space and had her foot off the accelerator when the vehicle lurched forward and hit a light pole. Customer further claims that the vehicle stoped after hitting the pole and did not continue revving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4885	CAMRY	2007	2/9/2010	Customer called regarding his 2007 Toyota Camry SE. Specifically customer claims that in July 2009 his wife was backing out of a parking spot when she was hit by another vehicle. Customer claims that upon being hit by another vehicle, her vehicle suddenly took off, causing her to crash into several other cars. Customer further claims that his wife had her foot on the brake pedal but the vehicle continued to accelerate. Customer alleges that the vehicle finally came to a stop when it hit a van but the engine revved until it was turned off.
4886	CAMRY	2009	2/9/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 9/15/2009, she was driving approx. 60 mph on the highway and, in attempting to change lanes, pressed on brakes but the vehicle kept increasing speed. Customer further claims that she let go of all the pedals and the vehicle hit a pole. She states that she had her carpet floor mats at the time. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4887	MATRIX	2009	2/9/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4888	CAMRY	2007	2/9/2010	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that on February 7, 2010 her vehicle began to surge and the engine began to rev as she was approaching an intersection, causing her to swerve to avoid other cars and ultimately crash into a curb. Customer further claims that at the time of the accident she was traveling at a rate of 40 mph and that although she pressed the brake pedal the vehicle would not come to a stop. Customer alleges that the accident occurred while the vehicle was in motion.
4889	Corolla	2009	2/10/2010	Customer claims that while vehicle was stopped the engine started to rev and tried to take off, and vehicle continue to rev upon being restarted. Vehicle tested by technician who drove it approximately 10-12 minutes, and who experienced the vehicle begin to accelerate on its own after vehicle lightly accelerated from a stop. Vehicle was inspected by the national office and region office and condition experienced by the customer and technician was never duplicated.
4890	AVALON	2005	2/10/2010	Customer called regarding her 2005 Toyota Avalon Touring. Specifically, customer claims that on February 3, 2010, as she was pulling into the driveway the gas pedal got stuck or hesitated and then the vehicle flew forward, causing her to hit wires attached to a telephone pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4891	TUNDRA	2007	2/10/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on February 5, 2010, his vehicle experienced unintended acceleration as he was changing lanes, causing him to collide with another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4892	PRIUS	2006	2/10/2010	Insurer called on behalf of customer regarding her 2006 Toyota Prius. Specifically, insurer claims that on September 28, 2009, customer's vehicle experienced unintended acceleration, causing her to collide with a vehicle in front of her.
4893	AVALON	2007	2/10/2010	Customer's husband called regarding customer's 2007 Toyota Avalon Limited. Specifically, customer claims that in the Fall of 2009 she was driving her vehicle in a parking lot at 5-10 mph when the gas pedal became stuck and lunged forward into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4894	AVALON	2006	2/10/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on April 20, 2009, while at a four way intersection, he was hit head on in the intersection by a truck that was coming off the expressway ramp. Customer further claims that the vehicle accelerated and she could not stop her vehicle at the light. Customer claims that she applied the brakes but the vehicle kept going faster. Customer claims to have suffered severe injuries. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4895	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that in November 2009 his vehicle was slowly reversing when it suddenly surged, causing him to crash into a garage and fence. Customer further claims that he then put the car into drive and it surged forward. Customer claims that he applied the brake and the vehicle finally came to a stop.
4896	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that on February 9, 2010 put his vehicle into drive and it suddenly jumped forward, causing him to hit the car parked in front of him. Customer further claims that the accident occurred at a gas station as he was moving his vehicle up two feet so that the gas hose would reach his vehicle.
4897	CAMRY	2008	2/10/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 2/9/2010, she was pulling into a garage and her vehicle went over the curb stop inside and hit a shelf. Customer further claims that the pedal seemed hard to press, and that she is not sure whether the pedal has been stuck before. Customer states that the floor mats are in the vehicle and she did not remove them.
4898	COROLLA	2010	2/10/2010	Customer's relative called regarding customer's 2010 Corolla LE. Specifically, customer claims that when he was backing out of a parking spot the vehicle just took off, causing him to run into cables that were connected to a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4899	PRIUS	2008	2/10/2010	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on an unknown date, as she was pulling into a parking space, with her foot on the brakes, the vehicle suddenly surged and jumped a curb, and the car landed in a grassy section. Customer further claims she felt almost as if the car were airborne. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4900	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that on December 19, 2009 her vehicle suddenly began to accelerate, causing her to turn and hit an embankment head on. Customer further claims that at the time of the unintended acceleration she was traveling at a rate of 25-35 mph and was switching lanes on the highway. Customer alleges that the incident occurred while the vehicle was in motion.
4901	AVALON	2008	2/10/2010	Customer called regarding her 2008 Toyota Avalon. Specifically, customer claims that on an unknown date she was driving out of a parking garage when the vehicle lurched and accelerated into a pole. Customer further claims that on another unknown date the vehicle over accelerated and jumped the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4902	PRIUS	2007	2/10/2010	Customer called regarding her 2007 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was not in motion.
4903	AVALON	2006	2/10/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that in November 2009 when she put her car in reverse it lurched backwards and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4904	TUNDRA	2007	2/10/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer called to update the vehicle's owner information.
4905	AVALON	2007	2/10/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on unknown dates he has experienced lunging and jerking. Customer further claims that on unknown dates he experienced rough acceleration.
4906	COROLLA	2009	2/10/2010	Customer relations manager called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on February 10, 2010, the vehicle was in an accident caused by sudden acceleration.
4907	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that in January 2010 she was driving at 35 mph and due to unintended acceleration her vehicle jumped to 40 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4908	PRIUS	2009	2/10/2010	Customer called regarding her 2009 Toyota Prius Hybrid. Specifically, customer claims that on January 20, 2010, her vehicle lunged forward when she was making a right hand turn into a parking space, causing her to roll into a wall. Customer further claims that the sudden acceleration occurred when she took her foot off the accelerator to place the vehicle into park.
4909	ES350	2010	2/10/2010	Customer called regarding her 2010 Lexus ES 350. Specifically, customer claims that on an unknown date, while pulling into a parking space, the vehicle leaped forward. Customer claims that she was not sure if she used the brake to stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4910	CAMRY	2008	2/10/2010	Customer called regarding his 2008 Toyota Camry. Customer does not report any incidents, but wants to replace his vehicle after learning of the recall.
4911	COROLLA	2009	2/10/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on January 30, 2010, she was driving and tried to stop when she saw the vehicle in front of her stop, but was not able to stop and rear ended the other vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4912	CAMRY	2009	2/10/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was driving with the cruise control set at 72 mph, but the vehicle sped up to about 85 mph and the customer received a speeding ticket.
4913	CAMRY	2010	2/10/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on January 4, 2010, while driving at 35-40 mph, the vehicle suddenly accelerated, and customer could not control the vehicle. Customer further claims there was ice on the road, and as a result of the sudden acceleration, he hit the call of the highway and circled once, causing another vehicle to hit his vehicle. Customer further claims he suffered a back injury, and the cost of repairs is approximately \$13,600. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4914	TACOMA	2007	2/10/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle revved up on an unspecified date. FTS did not inspect the vehicle. It is unknown if the vehicle was in motion at the time of the incident.
4915	MATRIX	2009	2/10/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on February 10, 2010, customer's wife was pulling into a parking space with her foot on the brake when the vehicle accelerated, hit the cement block and then a building. Customer further claims that after the vehicle came to a stop the vehicle was still revving and smoke was coming out of the vehicle. Customer claims that the sudden acceleration occurred both when the vehicle was already in motion and when vehicle was at a full stop.
4916	PRIUS	2006	2/10/2010	Customer called regarding his 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated into a wall. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4917	TUNDRA	2008	2/10/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date, his vehicle surged while backing into a parking spot, causing a collision with a pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4918	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on an unknown date she was in a parking lot when she hit the brake and the vehicle took off on its own. Customer further states that the vehicle then hit a building and a pole.
4919	CAMRY	2008	2/10/2010	Customer sent letter regarding his 2008 Toyota Camry. Customer provides no specifics, but claims that he has experienced sudden acceleration.
4920	AVALON	2007	2/10/2010	Customer called regarding her 2007 Toyota Avalon XLS. Specifically, customer claims that on an unknown date in December, she was involved in an accident.
4921	HIGHLANDER	2010	2/10/2010	Customer called regarding her 2010 Toyota Highlander. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in not motion.
4922	CAMRY	2007	2/10/2010	Customer called regarding her Toyota 2007 Camry LE (V6). Specifically, customer claims that in August 2009 her vehicle suddenly accelerated as she was pulling into a carport, causing it to jump the curb and crash into a fence. Customer further claims that her vehicle had unintended acceleration twice before that accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4923	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that on February 9, 2009, her son was driving the vehicle when it began to accelerate on its own, causing him to crash into the freeway wall. Customer alleges that the incident occurred while the vehicle was in motion.
4924	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry XLE. Specifically customer claims that in December 2009 her vehicle suddenly surged forward as she was pulling into a parking space, causing her to hit a concrete light post. Customer further claims that this is not the first time the vehicle suddenly surged. Customer alleges that she brought the vehicle to the dealership for a similar problem in 2008.
4925	TACOMA	2005	2/10/2010	Customer called in regarding a 2005 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused two accidents, the most recent of which occurred on 1/17/2006. FTS did not inspect the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4926	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 2/08/2010 she was driving on highway and vehicle self accelerated while her foot was on the brake.
4927	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that in August 2007 his wife was putting the vehicle into the garage when it accelerated and hit a motorcycle.
4928	COROLLA	2010	2/10/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date, he was driving his old 2008 Toyota Corolla when he was unable to stop the vehicle, ran a red light and totaled the vehicle. Customer further claims that he then purchased a 2010 Corolla and wanted Toyota to pay for the new vehicle.
4929	TACOMA	2007	2/10/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused an accident on 1/10/2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4930	RAV 4	2009	2/10/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle jerked when he wanted to take off from a stop sign.
4931	COROLLA	2009	2/10/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date in December 2009, customer was driving about 55 mph when the vehicle suddenly accelerated, and she pulled to the left and hit a metal post. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4932	COROLLA	2009	2/10/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on November 24, 2009, her vehicle lurched forward when she was pulling into a driveway, causing her to hit rocks and a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4933	TUNDRA	2008	2/10/2010	Customer called regarding her 2008 Toyota Tundra 4x4. Specifically, customer claims that on an unknown date, but likely in late January 2010, her vehicle surged backward, causing her to collide with a tree. A FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4934	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 1/15/10 she was backing out of a parking space but the accelerator wasn't responding, so she pressed harder which caused the vehicle to surge, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4935	CAMRY	2008	2/10/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on two occasions, dates unknown, the vehicle took off. One of these incidents occurred on the highway, but her husband was able to stop the vehicle. The other occurred while driving slowly in a parking lot and the vehicle struck another car.
4936	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on February 2, 2010, when she was pulling out of a gas station she tried to make a right turn but her vehicle went straight causing her to go over an curb and into a ravine. Customer further claims that she has noticed that her vehicle tends to jump when she presses the accelerator pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4937	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry. Customer provides no specifics, but claims that she has had acceleration problems.

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4938	VENZA	2009	2/10/2010	Customer called regarding his 2009 Toyota Venza. Specifically, customer claims that on February 10, 2010 the vehicle was involved in an accident due to unintended acceleration, in which the vehicle revved up. Customer further claims that he was unable to stop the vehicle by pressing the brakes. Customer further claims that the vehicle has had prior gas pedal difficulties, and that the accelerator pedal was hard to depress. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4939	AVALON	2007	2/10/2010	Customer called regarding her Toyota Avalon 2007 Touring. Specifically, customer claims that on January 6, 2010, her vehicle surged forward when she took her foot off the brake and lightly touched the accelerator, causing her to hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4940	HIGHLANDER	2008	2/10/2010	Customer called regarding her 2008 Toyota Highlander Ltd. Specifically, customer claims that on unknown dates the vehicle lunged forward when she pressed the brakes. Customer further claims that the vehicle did not respond when the customer firmly pressed the brakes.
4941	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on 2/07/2010 her daughter lost control of the vehicle while driving on the freeway. Customer does not specifically claim that unintended acceleration caused the problem.
4942	MATRIX	2009	2/10/2010	Customer called regarding his 2009 Toyota Corolla Matrix. Specifically, customer claims that on January 16, 2010, he pulled into a restaurant going 1 mph when the vehicle shot over two curbs. Customer further claims that the vehicle wanders when the customer does not have his hands on the steering wheel. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4943	CAMRY	2010	2/10/2010	Customer called regarding his 2010 Toyota Camry XLE. Specifically, customer claims that when he presses the gas pedal his vehicle accelerates very quickly.
4944	AVALON	2006	2/10/2010	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while driving, his vehicle accelerated even though he believes he was pressing on the brake pedal.
4945	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry SE. Specifically customer claims that on January 20, 2010 his son was involved in an accident with the vehicle due to unintended acceleration. Customer further claims that his son was exiting from freeway, and tried to apply brakes at red light but the vehicle continued to accelerate, causing him to crash into a tree. Customer alleges that the incident occurred while the vehicle was in motion.
4946	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on 11/17/09 she was in the garage, stopped with her foot on the brake and the vehicle in reverse, when the vehicle suddenly accelerated backwards on its own, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
4947	CAMRY	2009	2/10/2010	Customer's attorney wrote letter regarding customer's 2009 Toyota Camry. Specifically, customer claims that on unknown dates customer experienced hesitation upon acceleration, among other issues.
4948	TUNDRA	2007	2/10/2010	Customer called regarding 2007 Toyota Tundra 4X4. Specifically, customer claims that he had his foot on the brake pedal when the vehicle suddenly accelerated, increasing its RPMs. Customer further claims that he put the vehicle in neutral but that the engine kept revving. Customer states that the accelerator pedal was not stuck.
4949	TUNDRA	2009	2/10/2010	Customer called regarding his 2009 Toyota Tundra 4x4. Specifically, customer claims that on February 9, 2010 the vehicle suddenly accelerated on its own as he was coming to a stop light, causing him to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4950	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in June 2008 her vehicle continued to accelerate, resulting in an accident.
4951	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on four occasions, dates unknown, his vehicle unintentionally accelerated.
4952	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on November 19, 2009, her vehicle revved and lurched forward when she was at a stop sign, causing her to hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4953	CAMRY	2007	2/10/2010	Customer called regarding his 2007 Toyota Camry SE. Specifically, customer claims that he was exiting the freeway when although he applied the brakes his vehicle continued to accelerate, causing him to swerve so as not to hit another vehicle and crash into a curb.

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4954	CAMRY	2010	2/10/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates vehicle surged everytime he put it in reverse and also when driving. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4955	RAV 4	2009	2/10/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle frequently experiences accelerator issues, but does not provide a specific date. FTS did not inspect the vehicle and no further information is provided.
4956	MATRIX	2010	2/10/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, the customer claims that on 11/2/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4957	CAMRY	2010	2/10/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on January 31, 2010, he pulled in to a parking stall and all of sudden the vehicle accelerated forward and went into grassy area, and a boulder or large rock stopped the vehicle. Left wheel under carriage was laying on the rock. Customer further claims that his foot was on the brake when acceleration occurred. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4958	ES350	2007	2/10/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on December 11, 2009 the vehicle jolted when he transferred from the brake to the accelerator, causing him to lose control of the vehicle for a couple of seconds and get into a fender bender with the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4959	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/10/10, she was approaching a red light and felt that her vehicle was not slowing down.
4960	CAMRY	2009	2/10/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 1/7/2010, her father was backing out of the dealership when the vehicle automatically accelerated, causing the vehicle to hit a truck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4961	CAMRY	2007	2/10/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date in 2008 she experienced acceleration concerns.
4962	COROLLA	2009	2/10/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on February 2, 2010, customer's son was stopped at a stop sign, and when he released the brake pedal the vehicle surged and hit the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4963	CAMRY	2010	2/10/2010	Customer called regarding her 2010 Toyota Camry XLE. Specifically, customer claims that on December 3, 2009, customer's grandson was driving about 25-30 mph and had his foot off the accelerator when the vehicle jumped. He swerved to avoid another vehicle and hit a curb. Customer further claims that on unknown dates when trying to brake, vehicle seemed to lunge. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4964	CAMRY	2008	2/10/2010	Customer called regarding her 2008 toyota Camry. Specifically, customer claims that on 2/08/2010 she was driving in a round-about when she could not stop the vehicle and hit the curb.
4965	CAMRY	2010	2/10/2010	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer claims that on unknown dates the vehicle surged and the transmission was slipping.
4966	ES350	2008	2/10/2010	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on May 8, 2008, while on the freeway, he was in an accident allegedly caused by sudden acceleration. Customer claims that the vehicle rolled forward even though he did not step on gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4967	COROLLA	2009	2/10/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates, the vehicle had unintended acceleration when he drove over 65 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4968	CAMRY	2010	2/10/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, while driving a previously-owned Lexus, she experienced unintended acceleration that caused her to drive into a building, so bought a Camry, but is now scared to drive the Camry now that it is involved in 2 recalls. Customer requested papers to begin the arbitration process.

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4969	RAV 4	2009	2/11/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused an accident in December of 2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4970	CAMRY	2008	2/11/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that in June 2009 he could not stop the vehicle while driving and the vehicle accelerated into a wall.
4971	AVALON	2007	2/11/2010	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on February 4, 2010, while his wife was driving at a slow speed, the vehicle in front of her began to slow, and her vehicle began to accelerate. Customer further claims that white smoke was coming from the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4972	TUNDRA	2007	2/11/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that while he was at a stop light, it seemed like the vehicle wanted to lunge forward. Customer further claims that on two occasions, the vehicle turned off while he was driving. Customer also has concerns about vehicle's tires. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4973	CAMRY	2010	2/11/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on October 9, 2009, while turning, the vehicle suddenly accelerated (did not slow down when took foot off accelerator or when applied the brakes), and vehicle fishtailed and the rear quarter panel on the driver's side hit a parked vehicle, hit the rear bumper on the passenger side, and the rim on the passenger side was also bent. Customer further claims there was light snow on the road, and there were no injuries. Customer further claims the vehicle had been idling high leading up to the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4974	MATRIX	2009	2/11/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on an unknown date she was driving 35 mph when the vehicle jerked forward and went off the road, damaging the passenger side wheels and tires. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4975	AVALON	2008	2/11/2010	Customer called regarding her 2008 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, the previous owner might have been involved in an accident.
4976	RAV 4	2009	2/11/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle lunged when he let go of the brakes and applied the accelerator while at a red light. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
4977	COROLLA	2010	2/11/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 9, 2010, customer's daughter was driving and tried to make a turn and collided with another vehicle.
4978	TACOMA	2007	2/11/2010	Customer called in regarding a 2007 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated and caused an accident in June of 2009. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
4979	CAMRY	2009	2/11/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date he was driving up his steep driveway and got to the top where it levels off, as he eased up on accelerator, the vehicle suddenly surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4980	COROLLA	2010	2/11/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates she has experienced unintended acceleration after the recall repair was completed.
4981	PRIUS	2005	2/11/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on 5/28/09, the vehicle unintentionally accelerated into a fence and then a river bed. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4982	CAMRY	2010	2/11/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, his daughter was driving the vehicle and experienced unintended acceleration. Customer further claims he heard a noise underneath the vehicle, that he bought the vehicle for his daughter, and is afraid for her safety because she is young and would not know what to do if her vehicle suddenly accelerated. Customer states he does not want the vehicle anymore, is unhappy with the dealer response.

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4983	COROLLA	2009	2/11/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on February 11, 2010, he was pulling into a parking space when the vehicle suddenly accelerated and hit the vehicle parked in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4984	TACOMA	2008	2/11/2010	Customer called regarding 2008 Toyota Tacoma Prerunner. Specifically, customer claims that he was pulling the vehicle into his driveway and had removed his foot from the gas pedal when the vehicle suddenly accelerated through the garage door. Customer claims that sudden acceleration occurred when the vehicle was already in motion.
4985	AVALON	2007	2/11/2010	Customer called regarding her 2007 Toyota Avalon XL. Specifically, customer claims that on January 23, 2010, she was involved in an accident allegedly involving her pedal. Customer claims that while driving in light rain, at about 55 mph, going through a yellow light, she experienced some unintended acceleration. Customer claims that her brakes did not work and she hit a curb. Customer claims that her floor mats were clipped in place. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4986	CAMRY	2008	2/11/2010	Customer called regarding her 2008 Toyota Camry XLE (V6). Specifically, customer claims that on an unknown date the vehicle lunged forward. Customer furthers claims that the vehicle backed out on its own once. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
4987	ES350	2007	2/11/2010	Customer called regarding her 2007 Lexus ES 350. Specifically, customer claims that on unknown dates, she experienced sudden unintended acceleration.
4988	COROLLA	2009	2/11/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle idled at 5 mph and he did not have to press on the gas pedal for the vehicle to accelerate. Customer further claims that when he drove the vehicle, he had to hold down the brake as hard as he could to keep the vehicle from lunging forward. Customer claims that sudden acceleration occurred while vehicle was at a full stop.
4989	CAMRY	2007	2/11/2010	Customer called regarding her 2007 Toyota Camry. Customer does not provide specifics, but claims that her vehicle is unintentionally accelerating.
4990	AVALON	2006	2/11/2010	Insurance agent called regarding customer's 2006 Toyota Avalon. Specifically, customer claims that on January 24, 2010 the vehicle accelerated on its own while she was pulling into a church parking lot with her foot on the brake, causing her to run into the church. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4991	CAMRY	2007	2/11/2010	Customer called regarding her 2007 Toyota Camry. Customer does not provide specifics, but claims that she has experienced unintended acceleration problems.
4992	MATRIX	2009	2/11/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, the customer claims that on 1/00/10, the vehicle unintentionally accelerated into a pole. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
4993	TACOMA	2008	2/11/2010	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that the vehicle's brake and accelerator pedals are too close together, which he believes may be the cause of others' acceleration concerns. Customer further claims that in the winter he wears large boots and the boot would catch the right hand side of the brake pedal when he pressed the gas pedal.
4994	CAMRY	2007	2/11/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his wife experienced acceleration problems on four occasions, dates unknown. Customer provides details of two incidents, both of which involved accelerations while his wife was attempting to park the vehicle.
4995	COROLLA	2010	2/11/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on unknown dates he experienced unintended acceleration while driving on the highway. Customer further claims that when the vehicle was traveling over 45-50 mph the vehicle veers to the left or right even if the steering wheel remains straight. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4996	CAMRY	2008	2/11/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that in November 2009 her vehicle violently accelerated when she was backing out of her driveway with her foot on the brake pedal, causing her to hit the curb and some trash cans. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4997	CAMRY	2009	2/11/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 7/7/08, she was pulling into a parking space when the vehicle automatically accelerated and hit a pole. Customer does not know whether she had her foot on the brake when the vehicle had unintentional acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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4998	TUNDRA	2010	2/11/2010	Customer called regarding his 2010 Toyota Tundra 4x4. Specifically, customer claims that on February 6, 2010 the vehicle began to speed up when he applied the brakes because the vehicle in front of him stopped. Customer further claims that he put the vehicle in neutral, and rear-ended the car in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
4999	MATRIX	2009	2/11/2010	Insurance agent called regarding her customer's 2009 Toyota Corolla. Specifically, the customer claims that on 10/19/09, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5000	COROLLA	2009	2/11/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 10, 2010, she was driving and stepped on the brakes but the vehicle accelerated on the icy road and hit another vehicle. Customer further claims that she experienced unintended acceleration about four times before. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5001	TUNDRA	2007	2/11/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on February 10, 2010 the vehicle slowed from 30 mph to 5-10 mph but would not stop when he applied the brakes to make a turn. Customer further claims that he went through the intersection and hit a wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5002	CAMRY	2007	2/11/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he was driving his vehicle on 10/06/2007 and it sped up when tried to apply the brakes, rearending another vehicle.
5003	COROLLA	2009	2/11/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, customer's wife was coming to a stop in front of a house when the vehicle lunged forward and hit some lawn furniture. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5004	RAV 4	2009	2/11/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on an unknown date the vehicle accelerated up to 7000 RPM and that he panicked to stop the vehicle.
5005	PRIUS	2008	2/11/2010	Customer emailed regarding his 2008 Toyota Prius Hybrid. Specifically, customer claims that on June 30, 2009, he was pulling into a parking spot, and the car lunged forward and hit an electrical box mounted on the side of a building and the building itself, even though customer states he was pumping the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5006	RAV 4	2010	2/11/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on February 4, 2010 the vehicle suddenly accelerated and jerked when she pulled forward after backing out of her garage. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5007	PRIUS	2005	2/11/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5008	TACOMA	2008	2/11/2010	Customer called regarding his 2008 Toyota Tacoma. Specifically, customer claims that on February 11, 2010 the vehicle took off and crashed into the back of his garage when he was moving at 3 mph with his foot on the gas. Customer further claims that he had both feet on the brake pedal and the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5009	CAMRY	2009	2/11/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 1/20/2010, he was driving down the street when the vehicle in front of him stopped; when customer tried to stop his own vehicle, however, it continued to move forward, causing him to rear-end the other car.
5010	CAMRY	2009	2/11/2010	Customer emailed regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/11/10, she was driving at approx. 60mph when her vehicle made a very high-pitched sound. Customer further claims that when she tapped the gas pedal, the noise stopped briefly, then resumed for about five seconds; she states that during this time the engine was racing, as evidenced by the accelerated RPM.
5011	TACOMA	2010	2/11/2010	Customer called regarding his 2010 Toyota Tacoma. Specifically, customer claims that on an unknown date, his vehicle lurches forward and revs when it begins to accelerate.
5012	COROLLA	2009	2/11/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 11, 2010, she was turning into a parking spot and pressing the brakes to slow down when the vehicle surged forward and hit another vehicle. A Field Technical Specialist inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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5013	TUNDRA	2007	2/11/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle had an acceleration problem.
5014	COROLLA	2009	2/11/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on October 31, 2009, he was driving and attempted to stop when he saw vehicles stopped in front of him, but the vehicle accelerated when he applied the brakes and rear ended the vehicle in front of him. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5015	COROLLA	2009	2/11/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 5, 2010, she was driving and applied the brakes when she saw the vehicle in front of her stopped, but her vehicle did not stop and she rear ended the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5016	CAMRY	2007	2/11/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle often does not respond at first when he pushes the accelerator pedal and then lurches forward.
5017	PRIUS	2005	2/11/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on 01/16/10, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5018	CAMRY	2007	2/11/2010	Customer called regarding her 2007 Toyota Camry XLE (V6). Specifically, customer claims that on February 9, 2010, her vehicle's engine revved and suddenly lurched forward when her daughter was pulling into a parking spot and had come to a stop, causing the vehicle to crash into a vehicle parked in front of it.
5019	IS250	2007	2/11/2010	Customer called regarding her 2007 Lexus IS 250. Specifically, customer claims that in September 2009 she was backing out of a garage and her vehicle accelerated in reverse and hit the side of a fence. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5020	ES350	2009	2/11/2010	Customer called regarding his 2009 Lexus ES 350. Specifically, customer claims that on an unknown date the vehicle accelerated suddenly while his wife was pulling into a parking space. Customer further claims that his wife had her foot on the brake and was unable to stop the vehicle, causing her to hit a vehicle in front of her and a vehicle to the right of her. Customer further claims that the vehicle then died. An FTS inspected the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5021	COROLLA	2010	2/12/2010	Customer's son called regarding customer's 2010 Toyota Corolla LE. Specifically, customer claims that on December 31, 2009, as customer's son was advancing from at stopped position, the vehicle lunged forward and the engine revved. Customer further claims that the floor mat was bunched up under the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5022	TUNDRA	2007	2/12/2010	Customer called regarding his 2007 Toyota Tundra 4x4. Specifically, customer claims that on January 26, 2010 he had his vehicle inspected by a local dealer for a gas pedal concern. Customer further claims that the dealer failed to give him a copy of the recall order.
5023	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while exiting the freeway at approx. 10mph, his vehicle did not stop.
5024	COROLLA	2009	2/12/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on October 15, 2009, she was about to make a left turn and suddenly she was hit by another vehicle.
5025	COROLLA	2009	2/12/2010	Customer's insurance agent called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on June 17, 2009, customer was stopped in a driveway with his foot on the brake when the vehicle lurched forward into the garage door. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5026	AVALON	2007	2/12/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on October 8, 2009, she was approaching a stop sign and applied the brakes but the vehicle would not stop. Customer further claims that she knocked down a stop sign and the vehicle finally stopped when she slammed on the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5027	COROLLA	2009	2/12/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on February 4, 2010, her vehicle surged.

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5028	TUNDRA	2007	2/12/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that on November 6, 2009, he was pulling up to his driveway when the vehicle accelerated on its own, hitting the wall in front of him. A Field Technical Specialist (FTS) inspected the vehicle. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
5029	CAMRY	2010	2/12/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown date, while driving on the freeway, she heard a popping sound that lasted until she got to work. Customer further claims that there were no warning lights, and that she doesn't want the vehicle anymore.
5030	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry.
5031	COROLLA	2010	2/12/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she had the pedal SSC performed on the vehicle, but the pedal still felt loose and spongy.
5032	COROLLA	2009	2/12/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle accelerated, but she braked then disengaged cruise control, which seemed to work.
5033	COROLLA	2010	2/12/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on unknown dates, she was unable to stop her vehicle.
5034	CAMRY	2009	2/12/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/12/2010, while driving to merge onto the freeway she braked to slow down, but the vehicle did not slow down. Customer further claims that she has had other problems with her vehicle accelerator.
5035	COROLLA	2009	2/12/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, she was driving slowly when her vehicle accelerated and ran into a garbage can. Customer further claims that on another unknown date, she was turning into a parking space when she ran into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5036	TACOMA	2005	2/12/2010	Customer called regarding his 2005 Toyota Tacoma Prerunner. Specifically, customer claims that on unknown dates the vehicle accelerated without any warning, and that he has been pulled over on two occasions.
5037	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he experienced the vehicle accelerating at a high rpm.
5038	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that unknown dates he almost had collisions because his foot got stuck on the accelerator.
5039	CAMRY	2007	2/12/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in September 2009 her vehicle suddenly accelerated while driving in a residential area and that she hit a couple of mailboxes after the brakes failed to stop the vehicle.
5040	CAMRY	2010	2/12/2010	Customer called regarding his 2010 Toyota Camry.
5041	TUNDRA	2008	2/12/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that he changed lanes on the highway and felt the vehicle keep going forward. Customer further claims that the vehicle hit the side railing because of the problem. Customer states that he tried braking but felt that he did not have any control over the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5042	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 2/3/2010, he was approaching a stop light at approx. 10 mph, and he depressed the brake pedal but the vehicle continued to accelerate, thereby hitting the vehicle in front of it. Customer further claims that the brakes did not work and even though he put the vehicle in neutral it did not come to a stop.
5043	TUNDRA	2007	2/12/2010	Customer called regarding his 2007 Toyota Tundra. Specifically, customer claims that on an unknown date, his vehicle's engine was racing as he applied the brake, causing him to collide head-on with another vehicle. The engine revved after the accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5044	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically customer claims that on April 28, 2009, customer's son was driving the vehicle when another vehicle hit him, which caused customer's vehicle to accelerate and customer was unable to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5045	PRIUS	2004	2/12/2010	Customer called regarding her 2004 Toyota Prius. Specifically, the customer claims that on 08/29/09, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.

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5046	COROLLA	2010	2/12/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 12, 2010, she was driving slowly and attempted to stop at an intersection but her vehicle would not stop, and she hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5047	CAMRY	2009	2/12/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/3/2010, while her son was driving and the vehicle was in reverse, the accelerator pedal automatically accelerated and hit a truck that was stationary. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5048	CAMRY	2007	2/12/2010	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that on September 15, 2009, her vehicle surged when she was pulling out of a parking space, causing her to hit a truck. Customer further claims that her vehicle continued to surge and the engine raced. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5049	CAMRY	2008	2/12/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 9/18/2008 her vehicle shot forward uncontrollably and struck a parked car.
5050	COROLLA	2010	2/12/2010	Customer's insurance adjuster called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on January 28, 2010, the person who was driving the vehicle was driving slowly through an intersection was unable to stop for another vehicle and hit the other vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5051	AVALON	2007	2/12/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on an unknown date he was stopped at a light with his foot on the brake when the vehicle jumped and the engine revved up. Customer further claims that when he let up on the brake to pull over to the curb, the vehicle ran into the curb. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5052	CAMRY	2007	2/12/2010	Customer called regarding her 2007 Toyota Camry CE. Specifically, customer claims that on an unknown date her vehicle lunged forward when she depressed the brake pedal while going 5-6 mph, causing her to hit the vehicle in front of her, which crashed into the vehicle in front of it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5053	CAMRY	2007	2/12/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date her granddaughter was involved in an accident in which her granddaughter claims the vehicle sped up.
5054	TUNDRA	2010	2/12/2010	Customer called regarding his 2010 Toyota Tundra. Specifically, customer claims that on January 2, 2010, his vehicle surged while at a complete stop, causing him to collide with the car ahead of him. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5055	CAMRY	2010	2/12/2010	Customer called regarding her 2010 Toyota Camry SE. Specifically, customer claims that on unknown dates, the vehicle feels as though it is flying very fast when customer releases the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5056	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was in the process of changing lanes when he had to slam the brakes to try to prevent his car from hitting the vehicle in front of him. Customer further claims that he feels his vehicle has a problem with the electronics associated with the accelerator pedal.
5057	IS250	2010	2/12/2010	Customer called regarding her 2010 Lexus IS 250. Specifically, customer claims that when he takes a corner the door starts to open and the light flash, when he brakes the vehicle sways, and the vehicle seems to accelerate on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5058	CAMRY	2009	2/12/2010	Customer's husband called regarding customer's 2009 Toyota Camry SE. Specifically, customer claims that she experienced the accelerator pedal sticking and the vehicle taking off and lunging forward,
5059	RAV 4	2010	2/12/2010	Customer's wife called regarding customer's 2010 Toyota RAV4. Specifically, customer's wife claims that on unknown dates the vehicle had three instances where it felt like it was going to die, then jumped and accelerated when she pressed on the gas.
5060	CAMRY	2008	2/12/2010	Customer call regarding his 2008 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own. Customer further claims that he applied the brakes, hit a curb and then hit a hill. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5061	CAMRY	2010	2/12/2010	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer seeks repurchase of vehicle due to fear of potential safety defects in vehicle.
5062	CAMRY	2009	2/12/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 1/10/2010, she was driving through icy weather when she got into an accident.

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5063	CAMRY	2009	2/12/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date his wife was driving the vehicle and stopped at a red light, when the light turned green and she began accelerate the vehicle surged. Customer further claims this is the second time it occurred with his wife, and when he drives he finds the opposite, that the accelerator is slow to respond and he has to press it harder to keep up with traffic. Customer claims that the sudden acceleration occurred while the vehicle was at full stop.
5064	CAMRY	2008	2/12/2010	Customer's paralegal called regarding customer's 2008 Toyota Camry. Specifically, customer's paralegal claims that on 1/16/2010 customer had an accident after her brakes failed to stop the vehicle.
5065	CAMRY	2010	2/12/2010	Customer called regarding his 2010 Toyota Camry XLE. Specifically, customer claims that on February 11, 2010, his wife had her foot on the brake then put vehicle into reverse, and without releasing the brake pedal or touching the accelerator pedal the vehicle shot out of the parking structure. Customer further claims that the vehicle crashed into a brick wall causing rear damage, and his wife sustained head, neck & shoulder injuries. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5066	CAMRY	2010	2/12/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, her vehicle takes off faster than it should when she accelerates from a stop, and customer requests an inspection for this issue. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5067	CAMRY	2009	2/12/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates since getting her recalled vehicle repaired, she felt the pedal depressed lower when she drives and that there is a pull back motion when she accelerates.
5068	COROLLA	2010	2/13/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date he experienced brake issues and unintended acceleration.
5069	IS350	2009	2/13/2010	Customer called regarding her 2009 Lexus IS 350. Specifically, customer claims that she is having concerns with the vehicle's acceleration. Customer further claims that the vehicle decelerates and she can feel it down shift.
5070	TUNDRA	2007	2/13/2010	Customer called regarding her 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates the vehicle's gas pedal was sticking and experienced unintended acceleration. Customer further claims that she was able to put the vehicle in neutral and turn off the vehicle.
5071	PRIUS	2005	2/13/2010	Customer called regarding her 2005 Toyota Prius. Specifically, the customer claims that on 01/29/10, the vehicle unintentionally accelerated into an embankment. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5072	AVALON	2007	2/13/2010	Customer called regarding her 2007 Toyota Avalon Touring. Specifically, customer claims that on an unknown date, while pulling into a parking space her vehicle was involved in an accident. Customer claims that the vehicle automatically accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5073	RAV 4	2009	2/13/2010	Customer called in regarding a 2007 Toyota Prius and a 2009 Toyota Rav4. Specifically, the customer claims the Prius has experienced sudden unintended acceleration, but does not specify the date. FTS did not inspect either vehicle. The customer further claims the sudden acceleration occurs while the vehicle is already in motion.
5074	CAMRY	2010	2/13/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on an unknown date, she was driving on the street at 35 mph and vehicle accelerated to 50 mph for a couple of seconds. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5075	CAMRY	2009	2/13/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates since getting her recalled vehicle repaired, she has twice experienced unintended acceleration. Customer further claims that on 2/13/10, she was at a stop and the vehicle launched forward into the intersection, even though her foot was on the brake. Customer states that her husband placed the vehicle in neutral and placed his foot on the emergency brake, and this stopped the vehicle. Customer further claims that while driving home the same day the exact same thing happened.
5076	CAMRY	2009	2/13/2010	Customer called regarding his 2009 Camry XLE V6. Specifically, customer claims that in the summer of 2009 his engine was racing and idling extremely high when he hit the bumper of a small truck.

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5077	CAMRY	2007	2/13/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on an unknown date his vehicle revved and accelerated very fast while driving down the highway and he threw the vehicle into neutral until the revving stopped.
5078	CAMRY	2009	2/13/2010	Customer called regarding her 2009 Toyota Camry SE. Specifically, customer claims that on multiple unknown dates the vehicle has unintended acceleration while driving. Customer further claims that a third party mechanic confirmed the car was lurching and accelerating. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5079	AVALON	2006	2/13/2010	Customer called regarding his 2006 Toyota Avalon Touring. Specifically, customer claims that on February 1, 2010, while on a residential street coming up to a turn, the vehicle accelerated on its own, crossed the street and hit a pole. Customer claims he suffered severe injuries. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5080	CAMRY	2009	2/13/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on February 13, 2010, his recalled vehicle was repaired and on his way home the vehicle accelerated suddenly and hit another vehicle. Customer further claims that he was driving around 5-10 mph at the time when the vehicle accelerated on its own. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5081	CAMRY	2008	2/13/2010	Customer call regarding his 2008 Toyota Camry XLE. Specifically, customer claims that on an unknown date the vehicle rushed out when stopped. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5082	CAMRY	2007	2/13/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on 4/17/2009 her son was driving when the vehicle accelerated on its own and rear-ended another vehicle.
5083	PRIUS	2009	2/13/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 02/12/10, the vehicle unintentionally accelerated into a fence. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5084	CAMRY	2010	2/13/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on December 11, 2009, she was parking her vehicle inside her garage, when the vehicle suddenly accelerated, resulting in an accident that caused minor scratches on the left side and rear passenger door and wheel, and damage to the passenger mirror. Customer further claims a similar incident in garage happened in early January 2010. Customer claims there were no injuries. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5085	CAMRY	2008	2/13/2010	Customer called regarding her 2008 Toyota Camry. Customer does not claim any acceleration problems, but complains that trade-in value of her vehicle is low because of recall.
5086	TACOMA	2006	2/13/2010	Customer wrote a letter regarding his 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on July 23, 2006 the vehicle kept going forward as he approached his garage door and applied the brakes. Customer further claims that it felt like the accelerator was stuck in full throttle and wasn't stopping after he applied the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5087	TUNDRA	2007	2/13/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date his wife was parking the vehicle and when she put it into drive it accelerated suddenly, causing her to hit another parked vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5088	CAMRY	2009	2/15/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date while entering the highway his vehicle accelerated.
5089	AVALON	2005	2/15/2010	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, her vehicle accelerated. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5090	TUNDRA	2008	2/15/2010	Customer called regarding 2008 Toyota Tundra 4X4. Specifically, customer claims that he was in an accident on February 14, 2010. Customer further claims that when he pressed the brakes, the engine revved up and the RPMs remained high. Customer states that the vehicle lurched forward. Customer states that he swerved and hit a sign to avoid hitting another vehicle. Customer claims that vehicle sustained damage to its front end. Customer claims that sudden acceleration occurred when the vehicle was already in motion.

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5091	COROLLA	2009	2/15/2010	Customer's insurance agent called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on February 12, 2010, he was making a U-turn and applied the brakes but the vehicle did not stop, and he hit a wall. Customer further claims that on an unknown date, his daughter was driving and applied the brakes, but the vehicle did not stop and hit the vehicle in front of it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5092	AVALON	2007	2/15/2010	Customer called regarding his 2007 Toyota Avalon XLS. Specifically, customer claims that on November 8, 2009, while traveling on a highway, he attempted to apply his brakes, but the vehicle would not slow down, causing him to hit a concrete island. Customer took the vehicle to the dealer. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5093	CAMRY	2010	2/15/2010	Customer called regarding her 2010 Toyota Camry Sedan. Specifically, customer claims that on November 13, 2009, her vehicle jerked forward and kept accelerating when she was parking in her driveway and pressed the brake pedal, causing her to collide with the garage door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5094	TACOMA	2006	2/15/2010	Customer called regarding his 2006 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on February 7, 2010 the vehicle continued straight through a turn while his brother in law was driving. Customer further claims that the vehicle went off the road and into a ditch.
5095	CAMRY	2009	2/15/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 2/14/10 and other unknown dates the vehicle experiences unintended acceleration when pressing on the brake pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5096	TUNDRA	2008	2/15/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on January 9, 2010 the vehicle bumped into a grocery store light pole due to a stuck accelerator.
5097	CAMRY	2010	2/15/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates, while driving at 6-70 mph, the customer feels a grabbing feeling while accelerating, and also hears a clicking sound when vehicle accelerates. Customer claims she does not want to keep the vehicle because she does not feel safe, and seeks a refund or a new vehicle.
5098	PRIUS	2007	2/15/2010	Customer called regarding her 2007 Toyota Prius Hybrid. Specifically, customer claims that on unknown date, customer was slowly accelerating out of an apartment building, and vehicle jumped forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5099	CAMRY	2007	2/15/2010	Customer called regarding his wife's 2007 Toyota Camry LE. Specifically, customer claims that on February 12, 2010, when his wife was pulling into the garage the vehicle suddenly accelerated, causing the vehicle to crash into the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5100	CAMRY	2009	2/15/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on February 15, 2010, her vehicle suddenly accelerated when she was pulling into the driveway, causing her to crash into the living room of her house.
5101	COROLLA	2009	2/15/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on December 18, 2009, her pedal jammed when she pressed the gas pedal lightly and the vehicle suddenly accelerated, causing her to crash into her neighbor's fence. Customer further claims that although she pressed the brake pedal, it did not stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5102	CAMRY	2010	2/15/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on an unknown date his accelerator pedal stuck and his vehicle jerked when he accelerated from a stopped position. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5103	TUNDRA	2008	2/15/2010	Customer called regarding his 2008 Toyota Tundra 4x2. Specifically, customer claims that on an unknown date the vehicle was involved in an accident. Customer claims that he hit the brakes but that the vehicle did not stop and ran into a wall.
5104	COROLLA	2010	2/15/2010	Customer called regarding his 2010 Toyota Corolla LE. Specifically, customer claims that on February 12, 2010, his vehicle lunged forward when he stepped on the brake to slow down as he entered an intersection, causing him to hit another vehicle from behind. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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5105	TACOMA	2006	2/15/2010	Customer called regarding her 2006 Toyota Tacoma PreRunner. Specifically, customer claims that on February 2, 2010 the vehicle almost hit a pedestrian because it accelerated when she hit the brakes. Customer further claims that on February 10, 2010 the vehicle accelerated when she hit the brakes while pulling up to a stop sign, causing a collision with another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5106	VENZA	2009	2/15/2010	Customer called regarding 2009 Venza. Specifically, customer claims that she had an accident in her vehicle on February 14, 2010 when she was pulling into a parking spot and the vehicle lurched forward, hitting the fence in front of the parking spot. The vehicle allegedly sustained minor damage to the front end. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
5107	CAMRY	2009	2/15/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 2/11/10, a week after she brought her recalled vehicle to be repaired, she was pulling to a stop when the vehicle did not respond to the brake but kept accelerating, thereby hitting a log in a front yard. Customer further claims that she was going maybe 10 mph and maybe a little faster than that when going through the fence. She feels the problem was unintended acceleration. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5108	AVALON	2005	2/15/2010	Customer called regarding her 2005 Toyota Avalon XL. Specifically, customer claims that on an unknown date, her vehicle had an accident due to an alleged acceleration.
5109	RAV 4	2009	2/15/2010	Customer called regarding his 2009 Toyota RAV4 4 CYL. Specifically, customer claims that on an unknown date his vehicle surged when he in a parking space waiting to pull out. Customer further claims that in January 2010 his accelerator got stuck when he was pulling into the garage and he took his foot off of the brake. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5110	CAMRY	2009	2/15/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date he was driving about 20 mph and he had his foot on the gas pedal, when the vehicle accelerated on its own suddenly. Customer further states that to avoid hitting the car in front of him, he turned the steering wheel to the right and stepped on the brakes. He states that the vehicle finally stopped because he continued to press on the brakes and then placed the vehicle in neutral. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5111	COROLLA	2009	2/15/2010	Customer called regarding her 2009 Toyota Corolla XLE. Specifically, customer claims that on unknown dates her vehicle lurched a few times.
5112	COROLLA	2010	2/15/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on February 10, 2010, he was driving slowly around a bend, and when he took his foot off the gas pedal, the vehicle accelerated and hit a snow bank. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5113	CAMRY	2007	2/15/2010	Customer called regarding her 2007 Toyota Camry. Customer claims that in 2009 she took the vehicle to a dealer because of an acceleration issue and to have the floor mats removed.
5114	AVALON	2007	2/15/2010	Customer called regarding her 2007 Toyota Avalon. Specifically, customer claims that on an unknown date she was pulling into a parking spot when the vehicle suddenly jumped and accelerated more than she expected and ran into some shrubs. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5115	COROLLA	2010	2/15/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on an unknown date, he was backing into a parking space and tapped the gas pedal to go up a slight incline when the vehicle shot backwards and took off. Customer further claims that the vehicle ran into a tree Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5116	CAMRY	2009	2/15/2010	Customer called regarding his 2009 Toyota Camry LE. Specifically, customer claims that on an unknown date his daughter was driving when suddenly the engine surged. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5117	CAMRY	2008	2/15/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on October 7, 2009, the vehicle accelerated on its own while in the park position. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5118	RAV 4	2009	2/15/2010	Customer called regarding his 2009 Toyota RAV4. Specifically, customer claims that on February 13, 2010 the vehicle shot backwards 30 or 40 feet into a tree as he was driving in reverse. Customer further claims that on unknown prior dates the vehicle took off abruptly. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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5119	CAMRY	2007	2/15/2010	Customer's brother called regarding customer's 2007 Toyota Camry. Specifically, customer's brother claims that customer's foot slipped off the pedal twice because the pedal is too small.
5120	CAMRY	2007	2/15/2010	Son called regarding customer's 2007 Toyota Camry. Specifically, customer claims that sometimes the vehicle does not respond when the accelerator pedal is pressed, and sometimes it takes off.
5121	TUNDRA	2007	2/15/2010	Customer called regarding his 2007 Toyota Tundra 4x2. Specifically, customer claims that on July 31, 2009 the vehicle accelerated and would not stop when he hit the brakes, causing him to hit a pole. Customer further claims that he had taken the vehicle to the dealer 6 times for brake problems. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5122	COROLLA	2009	2/15/2010	Customer's husband called regarding customer's 2009 Toyota Corolla. Specifically, customer claims that on June 30, 2008, customer was coming up to a red light and tried to stop but the vehicle would not stop. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5123	CAMRY	2008	2/15/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on 9/27/2009 the vehicle accelerated forward when she removed her foot from the brake and rearended another vehicle.
5124	HIGHLANDER	2008	2/15/2010	Customer called regarding her 2008 Toyota Highlander. Specifically, the customer claims that on 2/10/10 the vehicle unintentionally accelerated into guard rail. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5125	AVALON	2005	2/15/2010	Customer called regarding her 2005 Toyota Avalon. Specifically, customer claims that on October 28, 2009 the vehicle accelerated as she was turning at a stop sign, and jumped into someone's yard. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5126	CAMRY	2009	2/15/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on November 27, 2009, her vehicle lurched forward when she was parking causing her to hit the back of a truck, which hit a bicycle, which hit a refrigerator, which crashed into the garage wall. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5127	CAMRY	2010	2/15/2010	Customer called regarding his 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle intermittently experienced sudden acceleration.
5128	TACOMA	2007	2/15/2010	Customer called regarding her 2007 Toyota Tacoma PreRunner L/B. Specifically, customer claims that on unknown dates the vehicle had three instances of unintended acceleration. Customer further claims that the vehicle made a clunk noise when she took her foot off of the brake pedal.
5129	RAV 4	2010	2/15/2010	Customer called in regarding a 2010 Toyota Rav4. Specifically, the customer claims the vehicle experienced sudden unintended acceleration, which caused an accident on 2/4/2010. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
5130	COROLLA	2009	2/15/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on February 1, 2010, she was driving in moderate traffic and applied the brakes but the vehicle kept accelerating and hit the vehicle in front of her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5131	CAMRY	2008	2/15/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date she was backing out of the driveway when the vehicle accelerated on its own and hit a mailbox.
5132	COROLLA	2009	2/15/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, he was driving in a 35 mph zone and the vehicle accelerated on its own to 55 mph, and customer was ticketed for speeding. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5133	CAMRY	2007	2/15/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in or around August 2008, her mother was driving the vehicle and was in an accident. Customer further claims that her mother hit the driveway door. Customer states that she took the vehicle to the dealer for the recall to be performed.
5134	CAMRY	2010	2/15/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle had acceleration issues. Customer further claims that her accelerator pedal needs to be replaced.
5135	ES350	2007	2/15/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on an unknown date, he experienced a concern with unintended acceleration.
5136	SEQUOIA	2008	2/15/2010	Customer's husband called regarding customer's 2008 Toyota Sequoia 2 WD SUV. Specifically, customer claims that on an unknown date when his wife tried to stop the vehicle it suddenly accelerated.

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5137	COROLLA	2009	2/15/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates, her vehicle jumped when she started it. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5138	TACOMA	2006	2/15/2010	Customer called regarding his 2006 Toyota Tacoma Prerunner. Specifically, customer claims that once the vehicle had 50,000 miles on it, it felt like it was surging when the it was stopped at a red light. Customer further claims that the surging feeling keeps getting worse. Customer states that unintended acceleration occurred while vehicle was at a full stop.
5139	CAMRY	2008	2/15/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that she was involved in two accidents, one on 9/25/2008 and the other date unknown, in which she applied the brakes but the vehicle did not stop in time and rearended the vehicle in front of her.
5140	CAMRY	2009	2/15/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on 2/15/10, he was driving at 60mph on cruise control, and when he shut off the cruise control the vehicle began to slow, but when he applied the brakes the vehicle began to accelerate. Customer further claims that he was unable to control vehicle and it struck rocks on the right hand shoulder of the road. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5141	CAMRY	2007	2/15/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his girlfriend was driving the vehicle and was backing out of a parking lot when the vehicle accelerated backwards and hit a wall. Customer further claims that when he drives the vehicle, he notices that even when his foot is not on the accelerator pedal the vehicle still moves forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5142	COROLLA	2009	2/15/2010	Customer called regarding her 2009 Toyota Corolla LE. Specifically, customer claims that on February 15, 2010, her vehicle lunged forward when she went to turn off her engine after parking, causing her vehicle to run up the steps of a condominium. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5143	RAV 4	2009	2/15/2010	Customer called regarding his 2009 Toyota RAV4 Limited. Specifically, customer claims that on an unknown date when his wife was 10 yards out of the driveway she attempted to accelerate but the pedal got stuck and suddenly accelerated, causing her to hit a mailbox pole. Customer further claims that on unknown dates it sometimes lunged when she pushed the accelerator, but other times she would have to continue pushing the accelerator before the vehicle would accelerate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5144	TACOMA	2007	2/15/2010	Customer called regarding his 2007 Toyota Tacoma PreRunner. Specifically, customer claims that on February 9, 2010 the vehicle was in an accident due to acceleration.
5145	Camry	2007	2/16/2010	An FTS from the U.S., issued on February 16, 2010, concerning a 2007 Toyota Camry, states that a customer complained that the gas pedal stuck. The vehicle was tested electrically and road tested. The condition was not reproduced. Probable cause was determined to be an improperly installed aftermarket floor mat.
5146	TUNDRA	2008	2/16/2010	Customer called regarding his 2008 Toyota Tundra 4x4. Specifically, customer claims that on February 6, 2010 the vehicle continued to go in reverse while he was backing up a boat into a lake and that the brakes did not work, causing the truck to go into the water. Customer further claims it seemed like the accelerator was stuck in the idle position. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5147	AVALON	2005	2/16/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on February 8, 2010 the vehicle accelerated and went off of the highway. Customer further claims that he never lost control of the vehicle, but that he received a speeding ticket for going faster than he intended. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5148	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he has experienced sudden acceleration in the vehicle. Details regarding the underlying incident are unclear.
5149	COROLLA	2009	2/16/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, he had experienced unintended acceleration.

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5150	CAMRY	2009	2/16/2010	Customer called regarding her 2009 Toyota Camry LE. Specifically, customer claims that on 12/1/09 she was backing out of a driveway when the vehicle took off and started spinning in circles until it hit a pole. Customer further claims that in September 2009 her husband experienced an unintended acceleration in the vehicle and had to ride the brake pedal to stop it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5151	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry Hybrid. Specifically customer claims that on February 13, 2010 his vehicle suddenly surged and jumped over a concrete barrier. Customer further claims that the accident occurred as he was pulling into a parking spot. Customer claims this is the first time he has ever experienced unintended acceleration in this vehicle.
5152	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that the vehicle suddenly surged forward when her daughter was driving at a slow speed, causing the vehicle to crash into a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5153	PRIUS	2008	2/16/2010	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on an unknown dates, but on three separate occasions, twice in one day, she had problems with unintended acceleration. Customer further claims that while driving, the vehicle accelerated at full throttle for about 2 seconds. Customer further claims that when going over rough surfaces and bumps while braking, vehicle shot forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5154	CAMRY	2008	2/16/2010	Customer called regarding her 2008 Toyota Camry SE. Specifically, customer claims that on an unknown date the vehicle surged when she pressed the acceleration pedal. Customer did not state whether the sudden acceleration occurred while the vehicle was at a full stop or already in motion.
5155	CAMRY	2008	2/16/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that on an unknown date her vehicle surged when she applied the gas. But she reports no accidents.
5156	COROLLA	2009	2/16/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on February 15, 2010, customer's daughter was driving and slowed down for a pedestrian crosswalk, and when she tried to accelerate the vehicle accelerated very fast and ran into a snow bank. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5157	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle idles high.
5158	COROLLA	2009	2/16/2010	Customer emailed regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle was in an accident while her husband was stopping at a red light. Customer further claims that on an unknown date the vehicle was in another accident when she and her husband could not stop the vehicle near their home while driving less than 25 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5159	CAMRY	2010	2/16/2010	Customer called regarding his 2010 Toyota Camry SE V6. Specifically, customer claims that in January or February 2010 his vehicle surged and jolted forward when he was traveling at about 55 mph on the highway. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5160	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that he was driving on a highway in bad conditions. Customer further claims that another vehicle cut him off so he applied the brakes but lost control of the vehicle. It is unclear whether this incident relates to unintended acceleration.
5161	PRIUS	2009	2/16/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 1/21/10, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5162	TACOMA	2009	2/16/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle experienced sudden acceleration.
5163	ES350	2008	2/16/2010	Customer called regarding his 2008 Lexus ES 350. Specifically, customer claims that on February 15, 2010, his vehicle accelerated while driving. Customer claims that he was accelerating and took his foot off the pedal but the vehicle continued to go. Customer further claims that he pulled the emergency brake and pumped the brakes and the vehicle stopped. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5164	COROLLA	2010	2/16/2010	Customer called regarding a 2010 Toyota Corolla LE rental car. Specifically, customer claims that on February 13, 2010 he was backing up when the vehicle suddenly launched forward into a business development and hit a wall.

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5165	PRIUS	2009	2/16/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 1/21/10, the vehicle unintentionally accelerated into a pole. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5166	CAMRY	2007	2/16/2010	Customer's wife called regarding customer's 2007 Toyota Camry LE. Specifically, customer claims that on February 18, 2010 when customer was attempting to park the vehicle, he reversed the car and when he put it back into drive the engine surged, causing the vehicle to jump the curb and crash into some bushes. Customer's wife further claims that on an unknown date she had a similar experience. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5167	AVALON	2005	2/16/2010	Customer called regarding his 2005 Toyota Avalon. Specifically, customer claims that on an unknown date the vehicle accelerated through a stop light and that he could not stop the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5168	TUNDRA	2008	2/16/2010	Customer called regarding 2008 Toyota Tundra 4X2. Specifically, customer claims that the vehicle has taken off on her and that she has consistently experienced unintended acceleration.
5169	CAMRY	2009	2/16/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on unknown dates she felt a vibration in her gas pedal while driving, and on one occasion the car accelerated, thereby causing damage to her bumper.
5170	CAMRY	2010	2/16/2010	Customer called regarding her 2010 Toyota Camry SE V6. Specifically, customer claims that in January 2010 the vehicle surged forward 3-4 feet into another vehicle when she reached over to grab something with her foot on the brake while in line at a restaurant drive-through. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5171	AVALON	2007	2/16/2010	Customer called regarding his 2007 Toyota Avalon. Specifically, customer claims that on June 28, 2008, he was stopped at a red light with his foot on the brake when the vehicle suddenly surged forward and would not stop even though his foot was still on the brake. Customer further claims that he hit three vehicles before his vehicle came to a stop. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5172	AVALON	2006	2/16/2010	Customer called regarding her 2006 Toyota Avalon XLS. Specifically, customer claims that on an unknown date, the vehicle accelerated. Customer further claims the engine revved up, but the vehicle did not go anywhere.
5173	COROLLA	2010	2/16/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on January 15, 2010, she was backing up slowly and applied the brakes, but the vehicle accelerated and hit the vehicle behind her. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5174	RAV 4	2009	2/16/2010	Customer called in regarding a 2009 Toyota Rav4. Specifically, the customer claims the vehicle suddenly unintentionally accelerated, but fails to specify a date. It is unknown if FTS inspected the vehicle. The customer further claims the sudden acceleration occurred while the vehicle was already in motion.
5175	CAMRY	2008	2/16/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 1/14/2010 his wife was involved in an accident. Customer's wife does not recall the accident, but customer wants to know if the problem is related to the recall.
5176	COROLLA	2010	2/16/2010	Customer's attorney called regarding customer's 2010 Toyota Corolla. Specifically, customer claims that on February 1, 2010, she was driving when the vehicle self-accelerated and hit a utility pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5177	COROLLA	2009	2/16/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on two unknown dates, she had experiences where the vehicle just started accelerating.
5178	CAMRY	2008	2/16/2010	Customer called regarding his 2008 Toyota Camry LE. Specifically, customer claims that in February 2010 his vehicle failed to stop when he hit his brakes, causing another vehicle to hit his vehicle. Customer further claims that the when he depressed the brakes they did not go down.
5179	PRIUS	2008	2/16/2010	Customer called regarding her 2008 Toyota Prius Hybrid. Specifically, customer claims that on unknown dates, when the vehicle was in park, the vehicle jumped out of place. Customer further claims that when she was getting an oil change, they asked her to start the car, and while it was idling, it jumped ahead, which was frightening as the technician was under the car. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.

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5180	PRIUS	2005	2/16/2010	Customer called regarding his 2005 Toyota Prius. Specifically, customer claims that on unknown dates the vehicle lunged forward when his foot was on the brake. Customer further claimed that it happened every time. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5181	TUNDRA	2007	2/16/2010	Customer called regarding her 2007 Toyota Tundra 4x4. Specifically, customer claims that on January 18, 2010, her vehicle surged while turning a corner, causing her to collide with a telephone pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5182	PRIUS	2009	2/16/2010	Customer called regarding her 2009 Toyota Prius. Specifically, the customer claims that on 2/16/10, the vehicle unintentionally accelerated into a vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5183	AVALON	2005	2/16/2010	Customer called regarding her 2005 Toyota Avalon XLS. Specifically, customer claims that in June or July 2009 her vehicle was involved in an accident because her vehicle took off on her.
5184	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that on February 15, 2009 her son was driving the vehicle when it suddenly surged forward, forcing the son to hit a curb in order to bring the vehicle to a stop. Customer alleges that the incident occurred while the vehicle was in motion.
5185	CAMRY	2008	2/16/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle surged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5186	COROLLA	2009	2/16/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date, she was driving in the rain and pumped the brakes but could not control the vehicle.
5187	CAMRY	2010	2/16/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on unknown dates the vehicle had issues with the accelerator pedal, and she has questions regarding the recall.
5188	CAMRY	2008	2/16/2010	Insurance company's attorney called regarding customer's 2008 Toyota Camry LE. Specifically, the attorney claims that on July 30, 2009, the vehicle accelerated when the customer backed up the vehicle. Customer's attorney further claims that the vehicle ran into a fence. The attorney claims that the sudden acceleration occurred while the vehicle was already in motion.
5189	COROLLA	2010	2/16/2010	Customer called regarding his 2010 Toyota Corolla. Specifically, customer claims that on February 5, 2010, his friend was driving the vehicle and slowly approached a stop sign; he hit the brake but the vehicle accelerated instead, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5190	TACOMA	2006	2/16/2010	Customer called in regarding a 2006 Toyota Tacoma. Specifically, the customer claims the vehicle suddenly unintentionally accelerated in 2008. It is unknown if FTS inspected the vehicle. It is unknown if the sudden acceleration occurred while the vehicle was already in motion.
5191	TUNDRA	2007	2/16/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that on February 9, 2010 he was parking the vehicle and stepped on the accelerator pedal, after which the vehicle surged forward and went over a post. Customer further claims that the incident resulted in a frontal collision and damage to the vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5192	CAMRY	2010	2/16/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle had issues with the accelerator pedal and with sudden acceleration.
5193	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically, customer claims that on December 10, 2009, her vehicle surged backwards when she was backing her vehicle up to a gas pump, causing the vehicle to strike into a pole. Customer further claims that on three unknown dates her vehicle took off on her.
5194	CAMRY	2010	2/16/2010	Customer called regarding her 2010 Toyota Camry LE. Specifically, customer's husband claims that on an unknown date, he was backing up the vehicle and it took off and would not stop. Customer states he hit a trailer hitch. Customer further claims he has experienced unintended acceleration on two other occasions while backing up. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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5195	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on January 17, 2010, the vehicle in front of him braked but his vehicle would not slow down. Customer further claims that he pressed on the brake pedal but the vehicle did not respond by braking. Customer states that he hit another vehicle at 8 to 10 miles per hour.
5196	CAMRY	2009	2/16/2010	Customer called regarding her 2009 Toyota Camry.
5197	MATRIX	2009	2/16/2010	Customer called regarding her 2009 Toyota Corolla Matrix. Specifically, customer claims that on October 31, 2009, her vehicle overaccelerated as she pressed the gas and the brakes failed, causing her to hit the car ahead. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5198	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that she was in an accident in December 2008. Customer further claims that she was driving at approximately 20 miles per hour when she tried to stop the vehicle but was unable to do so. Customer states that as a result she collided with a tree. Customer claims that there was major damage to her vehicle as a result of the incident.
5199	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry LE. Specifically customer claims that [on unknown dates] her vehicle lurches forward. Customer further claims that this occurs when the vehicle is at a full stop. Customer claims that she has to push the accelerator pedal several times in order for the vehicle to accelerate, causing it to lurch. Customer alleges that the incidents occurred while the vehicle was stopped.
5200	AVALON	2008	2/16/2010	Customer called regarding his 2008 Toyota Avalon XLS. Specifically, customer claims that in December of 2009, his vehicle accelerated, he applied the brakes, but the vehicle jumped the curb. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5201	CAMRY	2008	2/16/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle accelerated on its own and hit a tree. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5202	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry XLE. Specifically customer claims that [on an unknown date] his vehicle surged and would not stop, causing him to hit a curb.
5203	CAMRY	2007	2/16/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that her son was driving the vehicle and was in an accident in early February, 2010 when her son was unable to stop the vehicle and collided with the rear end of a truck.
5204	CAMRY	2010	2/16/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on unknown dates the vehicle accelerated and that he has had close calls with the accelerator.
5205	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that his vehicle has lost value as a result of the vehicle recall. This customer complaint appears not to involve any instances of unintended acceleration.
5206	CAMRY SOLARA	2008	2/16/2010	Customer called regarding his 2008 Toyota Camry Solara. Specifically, customer claims that on an unknown date, his vehicle experienced unintended acceleration.
5207	AVALON	2006	2/16/2010	Customer called regarding his 2006 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, the vehicle accelerated but there was no accident. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5208	CAMRY	2009	2/16/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on 9/14/09, she was at an intersection and her vehicle would not stop. Customer further claims that she was traveling about 25-30 mph at the time, and that the accident was fatal.
5209	COROLLA	2009	2/16/2010	Customer called regarding his 2009 Toyota Corolla S. Specifically, customer claims that on January 25, 2009 the vehicle accelerated forward when his daughter hit the brake while parking in his garage. Customer further claims that the vehicle went through drywall and collided with steps leading up to the door. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5210	AVALON	2006	2/16/2010	Customer called regarding her 2006 Toyota Avalon. Specifically, customer claims that on August 7, 2008 the vehicle surged and went over an embankment and into a pole as she was pulling into a parking lot with her foot off of the gas pedal. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5211	RAV 4	2009	2/16/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle picked up speed and shot out when she reached 50 mph. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

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5212	TACOMA	2009	2/16/2010	Customer called regarding his 2009 Toyota Tacoma. Specifically, customer claims that on unknown dates the vehicle has had three instances of spontaneous acceleration at low speeds.
5213	CAMRY	2007	2/16/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on October 7, 2008, she applied the brakes but was unable to stop the vehicle, causing a collision with the car in front of her. Customer further claims that her speed before impact was 40 miles per hour. Customer also states that the accelerator stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5214	CAMRY	2009	2/16/2010	Customer called regarding his 2009 Toyota Camry CE. Specifically, customer claims that on 2/12/10 he was driving 3-5 mph to park the car when suddenly the vehicle accelerated to 10 mph, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5215	Camry	2009	2/17/2010	An FTS from the U.S., issued February 17, 2010, concerning a 2009 Toyota Camry, states that a customer complained that the accelerator stuck while driving. The vehicle was inspected and test driven. The condition could not be reproduced. A towel and all-weather floor mat were removed from the drivers side.
5216	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on an unknown date she was driving on an incline and did not have to step on the gas pedal to continue driving for 1 mile. Customer further claims that the idle is too fast.
5217	CAMRY	2007	2/17/2010	Customer called regarding his 2007 Toyota Camry. Specifically, customer claims that on February 10, 2010, his wife was driving the vehicle and attempted to come to a stop, but the vehicle would not slow down. Customer further claims that the engine began to rev up even though she tried braking, causing her to collide with another vehicle from behind. Customer claims that sudden acceleration occurred while the vehicle was already in motion.
5218	CAMRY	2007	2/17/2010	Customer called regarding his 2007 Toyota Camry LE. Specifically customer claims that [on an unknown date] he previously complained to Toyota about his accelerator. Customer further claims that he is unhappy that the resale value of this vehicle has declined.
5219	PRIUS	2006	2/17/2010	Customer called regarding her 2006 Toyota Prius. Specifically, the customer claims that on unknown dates, the vehicle unintentionally accelerated. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5220	CAMRY	2007	2/17/2010	Customer called regarding his 2007 Toyota Camry SE. Specifically customer claims that [on an unknown date] his vehicle lunged forward and accelerated, causing him to rear end the car in front of him. Customer further claims that the accident occurred as he was approaching a stop light, he claims that he tried to apply the brakes but the vehicle continued to accelerate. Customer alleges that the incident occurred while the vehicle was in motion.
5221	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that she feels that there is something wrong with the vehicle because of all of the recalls.
5222	CAMRY	2009	2/17/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that in early 2009, her son was involved in an accident where he felt that the vehicle accelerated on its own.
5223	CAMRY	2009	2/17/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that in November 2009 his vehicle was parked facing the fence, and that when he took his foot off the accelerator to reach the brakes the vehicle accelerated into the fence.
5224	TUNDRA	2010	2/17/2010	Customer called regarding 2010 Toyota Tundra 4X2. Specifically, customer claims that the vehicle jerks and jumps and at times takes up to a minute to accelerate from a complete stop. Customer further claims that the vehicle has a sluggish response and seems hesitant to pick up speed.
5225	CAMRY	2009	2/17/2010	Insurance agent called regarding customer's 2009 Toyota Camry. Specifically, customer claims that on January 28, 2010, the vehicle accelerated on its own and hit the porch steps.
5226	CAMRY	2007	2/17/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on February 15, 2010, she was backing out of a parking lot when she hit a light pole. Customer further claims that when she put her vehicle in drive the vehicle accelerated on its own and the engine revved up and she hit a parked vehicle in front of her. Customer claims that the sudden acceleration occurred after the vehicle was at a full stop.
5227	AVALON	2005	2/17/2010	Customer called regarding her 2005 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, the motor had a hesitation and a shimmy.

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5228	COROLLA	2009	2/17/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on an unknown date the vehicle was involved in an accident, and seeks information on the recalls.
5229	CAMRY	2009	2/17/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on unknown dates he was experiencing acceleration problems and that the vehicle made a creaking/breaking sound when he turned the car.
5230	CAMRY	2007	2/17/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on an unknown date in 2008 she was driving at 35 mph and attempted to stop, but the vehicle seemed to accelerate on its own and hit another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5231	PRIUS	2008	2/17/2010	Customer called regarding her 2008 Toyota Prius. Specifically, the customer claims that on 2/16/10, the vehicle unintentionally accelerated into another vehicle. Customer claims that the sudden acceleration occurred while the vehicle was in motion.
5232	HIGHLANDER	2008	2/17/2010	Customer called regarding her 2008 Toyota Highlander V6. Specifically, customer claims that on January 11, 2010, her accelerator pedal stuck when she was pulling into a parking space and when she began easing her foot off the brake her vehicle surged forward, causing her to go over a railroad track and hit a bush. Customer further claims that her vehicle would shoot out sporadically. Customer claims that the sudden acceleration occurred while the vehicle was at a full stop.
5233	ES350	2007	2/17/2010	Customer called regarding his 2007 Lexus ES 350. Specifically, customer claims that on unknown dates in 2009, his vehicle experienced unintended acceleration.
5234	CAMRY	2007	2/17/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that in 2007, she was driving and the vehicle in front of her stopped. Customer further claims that she pressed on the brake but the car would not stop. Customer states that she hit the car in front of her at 45 miles per hour. Customer states that she was severely injured in the accident.
5235	RAV 4	2010	2/17/2010	Customer called regarding her 2010 Toyota RAV4. Specifically, customer claims that on unknown dates the vehicle jumped and surged.
5236	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 8, 2010, she was starting to back up when the vehicle suddenly accelerated from 1-2 mph to 5 mph and hit a parking meter pole. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5237	CAMRY	2009	2/17/2010	Customer called regarding his 2009 Toyota Camry Hybrid. Specifically, customer claims that on 2/11/10 he was driving in traffic and was coming to a stop behind another car when the vehicle suddenly accelerated, resulting in a collision. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5238	TACOMA	2010	2/17/2010	Customer called regarding his 2010 Toyota Tacoma. Specifically, customer claims that on an unknown date the vehicle might have had a slip in the transmission when he slows down.
5239	TUNDRA	2007	2/17/2010	Customer called regarding her 2007 Toyota Tundra 4x2. Specifically, customer claims that on unknown dates, her vehicle jumps when stopped at a red light and revs when accelerating.
5240	CAMRY	2008	2/17/2010	Customer called regarding her 2008 Toyota Camry LE. Specifically, customer claims that on an unknown date the vehicle lunged forward. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5241	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that in October 2009, she was turning and going down a curve when the vehicle lurched forward, causing the vehicle to come close to a drainage ditch. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5242	COROLLA	2009	2/17/2010	Customer called regarding her 2009 Toyota Corolla. Specifically, customer claims that on unknown dates the vehicle had continuous brake issues. Customer further claims that on unknown dates the vehicle veered from right to left when driving 55-65 mph, and that she experienced accelerator concerns.
5243	CAMRY	2008	2/17/2010	Customer called regarding her 2008 Toyota Camry. Specifically, customer claims that in May 2008 she rear-ended a UPS truck after hitting the brakes. Customer believes unintended acceleration might be the cause.
5244	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla S. Specifically, customer claims that on two unknown dates her vehicle suddenly accelerated causing it to hop forward.
5245	AVALON	2008	2/17/2010	Customer called regarding his 2008 Toyota Avalon Limited. Specifically, customer claims that on an unknown date, while his foot was on the brake, the vehicle accelerated in reverse. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
5246	CAMRY	2009	2/17/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer claims that on February 4, 2010, when she was approaching a guard gate and put both feet on the brake, her vehicle kept accelerating, causing it to crash into the guard gate. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5247	CAMRY	2009	2/17/2010	Customer called regarding his 2009 Toyota Camry. Specifically, customer claims that on an unknown date his son was involved in an accident.
5248	TUNDRA	2007	2/17/2010	Customer called regarding 2007 Toyota Tundra 4X2. Specifically, customer claims that he feels a "bump" when the vehicle begins to accelerate or when the vehicle is at a complete stop.
5249	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on December 26, 2009, she was parking the vehicle and pressed the brakes but the vehicle did not stop and she hit the vehicle in front of her. Customer further claims that on an unknown date in December 2009, she hit another vehicle while trying to stop in a parking spot. Customer further claims that on an unknown date in January 2010, customer's grand-daughter was backing out of a parking spot when the vehicle would not stop and hit the vehicle behind it. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5250	CAMRY	2010	2/17/2010	Customer called regarding her 2010 Toyota Camry. Specifically, customer claims that on an unknown date the vehicle accelerated on its own into some bushes when she was driving in a parking lot. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5251	CAMRY	2007	2/17/2010	Customer called regarding her 2007 Toyota Camry SE. Specifically customer claims that [on an unknown date] her vehicle suddenly accelerated for a period of 10 minutes. Customer further claims that at the time she was traveling at a rate of 25-30 mph and the vehicle accelerated to approximately 30-35 mph. Customer alleges that she later turned the vehicle on but it would not accelerate and had to be brought to the dealer. Customer alleges that the incident occurred while the vehicle was in motion.
5252	CAMRY	2008	2/17/2010	Customer called regarding his 2008 Toyota Camry. Specifically, customer claims that on 8/28/2009 he was stopped and when he applied the accelerator pedal the vehicle took off and hit a tree.
5253	CAMRY	2007	2/17/2010	Customer called regarding her 2007 Toyota Camry. Specifically, customer claims that on unknown dates, her vehicle experienced unintended acceleration.
5254	COROLLA	2010	2/17/2010	Customer called regarding her 2010 Toyota Corolla. Specifically, customer claims that on February 13, 2010, she was exiting a parking lot and applied the brakes to avoid hitting a cement post, but the vehicle accelerated and hit the post. Customer further claims that she hears a noise when applying the brakes while traveling at slow speeds and feels that it takes too long for the vehicle to stop when she applies the brakes. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5255	RAV 4	2009	2/17/2010	Customer called regarding her 2009 Toyota RAV4. Specifically, customer claims that on February 5, 2010 the vehicle jolted and picked up speed as she was backing out of her driveway, causing her to run into a parked vehicle. Customer further claims that on unknown dates the vehicle sometimes jolted forwards and backwards. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5256	CAMRY	2010	2/17/2010	Customer called regarding his 2010 Toyota Camry LE. Specifically, customer claims that on January 26, 2010 the vehicle would not slow down when his wife was attempting to decelerate while driving around a curb. Customer further claims that the vehicle ran off the road and side swiped a sign, came back on the road, then slid into some small trees in a ditch, and then came back on the road again and slowed down. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5257	IS350	2006	2/17/2010	Customer called regarding his 2006 Lexus IS 350. Specifically, customer claims that on February 17, 2010, as he was shifting from reverse to drive his vehicle surged into a snow bank.
5258	CAMRY	2009	2/17/2010	Customer called regarding her 2009 Toyota Camry. Specifically, customer wishes to return her vehicle.
5259	TACOMA	2010	2/17/2010	Customer's wife called regarding customer's 2010 Toyota Tacoma. Specifically, customer claims that in November 2009 he was slowly pulling into a parking lot and trying to brake when the vehicle surged, causing him to hit two vehicles. Customer further claims that it felt like the accelerator pedal got stuck. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.

	A	B	C	D
1	Model	Model Year	Report or claim date	Summary
5260	COROLLA	2009	2/17/2010	Customer called regarding his 2009 Toyota Corolla. Specifically, customer claims that on November 2, 2009, he was driving and hit the brakes when the vehicle surged, went into the center lane and then hit another vehicle in the far right lane. Customer further claims that the other vehicle went off the road, struck a tree, and then came back and hit the customer's vehicle. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5261	CAMRY	2010	2/17/2010	Customer called regarding his 2010 Toyota Camry SE. Specifically, customer claims that on February 17, 2010 the vehicle accelerated as he turned into his driveway and put his foot on the brake, causing him to run into the house. Customer claims that the sudden acceleration occurred while the vehicle was already in motion.
5262	CAMRY	2009	2/17/2010	Customer called regarding her 2009 Toyota Camry XLE. Specifically, customer claims that on multiple dates the vehicle was in accidents due to unintended acceleration. Customer further claims in one accident she was at an intersection and started to move forward, when the vehicle surged forward resulting in a collision. Customer did not indicate if the sudden acceleration occurred while the vehicle was at full stop or already in motion.
5263	Prius	2007	2/25/2010	Customer claims that when applying brakes over a dip in the road, the vehicle felt like it was surging forward instead of stopping. The vehicle was road tested with customer, and the problem was not duplicated. ECU programming was checked for the most current version. Engine ECU was re-flashed to newest software version (not for customer complaint issue).
5264	TACOMA	2007		An investigation report from the United States, issued on an unknown date concerning a 2007 Toyota Tacoma states that the customer complained that when shifting from 4th into 5th and the vehicle is traveling at 50MPH or more, the engine revolution sticks at high revolution in the neutral position and does not fall. The phenomenon was reproduced. After releasing the accelerator the revolution is maintained for 10 seconds or more. Does not occur with a comparison vehicle (new dealer car.) Occurs mainly in neutral position between 4th and 5th gears when speed is 50 MPH or higher. Does not occur in 3rd or lower gear and occurred once at 45 MPH. No issue with the floor mat and no aftermarket parts. According to TechStream data, the defective vehicle (compared with a good vehicle) has a lapse of time when the throttle remains slightly ajar even after releasing the accelerator and with this revolution appears to be held. There are no problems with the throttle connector, valve deposit, or other external appearance. Once the battery is cleared, the phenomenon disappears for a time, but after some driving it returns. The re