

RELIEF DEMANDED

Wherefore, proposed class representative request:

- (a) A proposed Order pursuant to Fed. R. Civ. P. 23(c) certifying the class and/or subclass as defined in ¶ 19 with such modifications, if any, to the proposed certification as required by the Court for the efficient and equitable administration of justice in this proceeding;
- (b) An Order appointing proposed class representative as representative of the proposed class and designating the law firms of Kantrowitz, Goldhamer & Graifman, P.C. and Thomas P. Sobran P.C. as counsel for the proposed class pursuant to Fed. R. Civ. P. 23(g);
- (c) Judgment for proposed class representative and proposed class members against the defendants on all issues and counts;
- (d) Damages for proposed class representative and proposed class members, including but not limited to multiple damages, together with interest, prejudgment interest, costs and attorneys' fees;
- (e) Restitution for all engine repairs incurred by proposed class representative and proposed class members resulting from the defectively designed and manufactured chain primary and secondary chain assemblies and incorrect maintenance and service intervals as set forth in the class vehicles' owner's manuals;
- (f) Restitution of incidental expenses incurred by proposed class representative and proposed class members, including but not limited to rental vehicles and other substitute transportation;
- (g) A Court issued declaratory judgment declaring that all class vehicle claims caused by their defective chain assemblies are within the scope of the class vehicles' warranty coverage; and,
- (h) Any other relief deemed necessary by the Court.

19. The proposed class representatives brings this proposed action pursuant to Fed. R. Civ. P.23(b)(1), 23(b)(2) and 23(b)(3) on behalf of themselves and all members of the proposed Class and subclasses (or any other class authorized by the Court) defined as follows:

Nationwide Class: All owners and former owners, lessees and former lessees of class vehicles who purchased their vehicles in the United States and who sustained monetary loss and/or diminution of class vehicle value resulting from the defendants' conduct as described in this complaint (hereinafter "proposed class members"). Excluded from the proposed class are the defendants together with their officers, directors, employees, assigns, and successors, the Court, Court staff, the defendants' counsel and all respective immediate family members of the excluded persons and entities described above. Also excluded from the proposed class are any and all claims involving personal injury.

New Jersey Class: All owners and former owners, lessees and former lessees of class vehicles who purchased their vehicles in the United States and who sustained monetary loss and/or diminution of class vehicle value resulting from the defendants' conduct as described in this complaint (hereinafter "proposed New Jersey class members"). Excluded from the proposed class are the defendants together with their officers, directors, employees, assigns, and successors, the Court, Court staff, defendants' counsel and all respective immediate family members of the excluded entities described above. Also excluded from the proposed class are any and all claims involving personal injury.

Illinois Class: All owners and former owners, lessees and former lessees of class vehicles who purchased their vehicles in the United States and who sustained monetary loss and/or diminution of class vehicle value resulting from the defendants' conduct as described in this complaint (hereinafter "proposed Illinois class members"). Excluded from the proposed class are the defendants together with their officers, directors, employees, assigns, and successors, the Court, Court staff, defendants' counsel and all respective immediate family members of the excluded entities described above. Also excluded from the proposed class are any and all claims involving personal injury.