1 Kevin J. McInemey, Esq., SBN 46941 Kelly McInemey, Esq., SBN 200017 2 Charles A. Jones, Esq., SBN 224915 McInerney & Jones 3 18124 Wedge Parkway #503 Reno, NV 89511 4 Telephone: (775) 849-3811 5 Facsimile: (775) 849-3866 CLERK OF THE SUPERIOR COURT 6 Attorneys for Plaintiff 7 8 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 BY FAX COUNTY OF ALAMEDA 11 07347405 TONY L. HOANG and CHARLES C. Case No. 12 STRONG, individually and on behalf of all others similarly situated, CLASS ACTION COMPLAINT FOR 13 14 Plaintiffs, 1.) Violation of Business & Professions Code Section 17200 et seq. 15 ٧. 2.) Negligent Misrepresentation 3.) Fraudulent Misrepresentation 16 AXIOM WORLDWIDE, LLC., a Florida 4.) Negligent Supervision corporation; AXIOM WORLDWIDE, INC., a 17 Florida corporation; JAMES GIBSON; NICK 18 EXHAROS; and DOES 1-50. JURY TRIAL REQUESTED 19 Defendants. 20 THIS IS A CLASS ACTION 21 22 This is a class action brought on behalf of all medical providers who have leased 1. 23 or purchased any of the "spinal decompression" machines manufactured by Axiom Worldwide, 24 LLC. These medical providers include, but are not limited to, chiropractors (DCs), medical 25 26 doctors (MDs), and doctors of osteopathy (DOs). These individuals are similarly situated under 27 California Code of Civil Procedure §382. Plaintiffs seek to recover the purchase price of the 28

CLASS ACTION COMPLAINT

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