

1 machine, interest paid on lease payments, penalties, interest, punitive damages, and attorney's
 2 fees and costs for themselves and all other present and former purchasers similarly situated. The
 3 Plaintiffs allege that they and other class members were fraudulently induced to purchase
 4 Axiom's "spinal decompression" machines based upon the negligent and fraudulent
 5 misrepresentations made by Axiom and its agents, including but not limited to such
 6 misrepresentations that the machines were FDA approved, were patented, had an 86% success
 7 rate, were based on NASA "space-age" technology, and that the treatments were covered and/or
 8 reimbursable by most insurance companies and Medicare.
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2. The Plaintiff Dr. Tony L. Hoang is a citizen and resident of the State of California. At all times relevant Dr. Hoang has resided in the County of Monterey. Dr. Hoang purchased one of Axiom's DRX 9000 machines in 2005. The Plaintiff Charles C. Strong is a citizen and resident of the State of California. At all times relevant Dr. Strong has resided in the County of Monterey but has his office in Santa Cruz County. Dr. Strong purchased one of Axiom's DRX 9000 machines in 2005.

3. The Plaintiffs are but two of hundreds of medical providers who, over the past seven years, have purchased or leased spinal decompression machines from Axiom. The Superior Court has jurisdiction because this is a class action which involves hundreds of individuals who were fraudulently induced to purchase these spinal decompression machines based upon Axiom's fraudulent and negligent misrepresentations and the monetary damages sought by Plaintiffs exceed the minimal jurisdictional limits of the Superior Court and will be established according to proof at trial. Venue is proper in Alameda because the Defendants, Axiom Worldwide, LLC. and Axiom Worldwide, Inc., are not licensed with the California