

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT

HAMPDEN, SS.

SUPERIOR COURT
CIVIL ACTION NO. 1879CV00344

RIAN WATERS
Plaintiff

vs.

AIDAN KEARNEY,
WORCESTER DIGITAL MARKETING, LLC
TURTLEBOY ENTERPRISES, LLC AND
SAMANTHA CARDIN
Defendants

HAMPDEN COUNTY
SUPERIOR COURT
FILED

OCT 18 2018

CLERK OF COURTS

After hearing, the motion is allowed. However counsel for the moving party must file an answer on their behalf no later than 11/26/18.

AME [Signature] 11/20/18

EMERGENCY MOTION OF THE DEFENDANTS, AIDAN KEARNEY, WORCESTER DIGITAL MARKETING, LLC, AND TURTLEBOY ENTERPRISES, LLC TO REMOVE THE DEFAULT AND REQUEST FOR LEAVE TO FILE ANSWER LATE

NOW COME the defendants, Aidan Kearney, Worcester Digital Marketing, LLC, and Turtleboy Enterprises, LLC ("Defendants"), and respectfully requests that this Court strike the Request for Default filed by the plaintiff, Rian Waters and/or remove the default pursuant to Rule 55(b) of the Massachusetts Rules of Civil Procedure. As grounds therefore, the Defendants refer to and incorporate the memorandum of law attached hereto.

WHEREFORE, based upon the foregoing, the Defendants respectfully request that the Request for Default be stricken and/or any default be vacated and the Defendants be allowed to answer the Plaintiff's Complaint.

To the Court - Please schedule the hearing, which does not have to occur on an expedited basis.

[Signature] 10/29/18 AME