

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF THE TRIAL COURT**

**HAMPDEN, SS.**

**HAMPDEN SUPERIOR COURT  
CIVIL ACTION: 1879CV344**

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**RIAN WATERS,  
Plaintiff,**

**v.**

**AIDAN KEARNEY, et al.**

**AFFIDAVIT OF AIDAN KEARNEY**

1. My name is Aidan Kearney, and I am one of the Defendants in the above matter.
2. I was the manager for the now defunct Worcester Digital Marketing, LLC and Turtleboy Enterprises, LLC.
3. I discovered that the above matter, which I believed to be dismissed, had been overturned by the Appeals Court, during the week of February 11, 2025.
4. I retained and notified my counsel immediately, who then reviewed the docket to determine the status of the case, and filed an appearance and Motion to Continue while he was on vacation.
5. Having been sued several times in several courts, in several states, and being on the receiving end of several attempts at filing criminal complaints against me by Mr. Waters, all of which have been unsuccessful, I believed that this would be dismissed as well (and was twice).
6. After the second dismissal, I moved to a new house. I did not alert the court to my change of address because the lawsuit had been dismissed.
7. When the Appeals Court overturned the dismissal, I never received notice or any of the Plaintiff's Motions. I have blocked Rian's phone number and email, due to his incessant harassment, so if he attempted to contact me I wouldn't know.

8. As soon as I discovered the default, I notified my attorney.
9. I have meritorious defenses against the Plaintiff.

Signed under the pains and penalties of perjury this 3<sup>rd</sup> day of March, 2025.

\_\_\_\_\_ *Aidan Kearney* \_\_\_\_\_

Aidan Kearney