

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)
Defendants)

HAMPDEN COUNTY
SUPERIOR COURT
FILED
FEB 4 2019
[Signature]
CLERK OF COURTS

DEFENDANTS, AIDAN KEARNEY, WORCESTER DIGITAL MARKETING, LLC,
AND TURTLEBOY ENTERPRISES, LLC
MOTION TO DISMISS

NOW COME the defendants, Aidan Kearney, Worcester Digital Marketing, LLC, and Turtleboy Enterprises, LLC (“Defendants”), and respectfully move this Court to dismiss the Second Amended Complaint filed against them by the Plaintiff, Rian Waters. As grounds therefor and in support thereof, Defendants state that the Plaintiff has failed to state a claim upon which relief can be granted pursuant to Rule 12(b)(6) of the Massachusetts Rules of Civil Procedure.

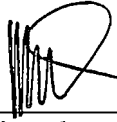
As further grounds for this motion, Defendant refers to and incorporates the attached memorandum of law.

WHEREFORE, Defendants respectfully request that this Honorable Court dismiss the Plaintiff’s Second Amended Complaint as outlined in the Memorandum.

2/5/19 called to manage

43

AIDAN KEARNY,
WORCESTER DIGITAL MARKETING, LLC
TURTLEBOY ENTERPRISES, LLC
By their attorney,



Kevin Chrisanthopoulos, Esq.
BBO # 643734
KC LAW
30 Court Street, Suite 1
Westfield, MA 01085
(413) 251-1010
(413) 372-1610 fax
Kevin@KCTrialAttorney.com

CERTIFICATE OF SERVICE

I, Kevin Chrisanthopoulos Esq., hereby certify that on this 17 day of January 2019, I served a copy of the above upon the parties in the action in hand, to the plaintiff:

Rian Waters

Subscribed under the penalties of perjury.



Kevin Chrisanthopoulos, Esq.