

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

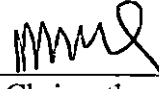

CLERK OF COURTS

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.

Respectfully submitted,
Attorney for Aidan Kearney,
Worcester Digital Marketing, LLC
Turtleboy Enterprises, LLC



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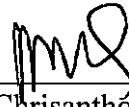
DATED: September 25, 2018

CERTIFICATE OF SERVICE

I, Kevin Chrisanthopoulos, Esq., hereby certify that on this 25th day of September, 2018, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to:

Rian Waters
199 Allen Street
East Longmeadow, MA

Subscribed under the penalties of perjury.



Kevin Chrisanthopoulos