

COMMONWEALTH OF MASSACHUSETTS

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
DEC - 9 2019
[Signature]
CLERK OF COURTS

Motion to declare notice of appeal valid

The Plaintiff Rian Waters moves for this court to consider his July 3rd 2019 Notice of Appeal as valid. Summary Judgment decision and order in favor of the Defendants was filed June 20th, 2019, and was docketed June 27th, 2019. The Plaintiff filed a notice of appeal on July 3rd, 2019, but the John Doe defendants were not dismissed until July 8th. The Clerk's Office told the Plaintiff on October 31st that his notice of appeal was void because he filed premature

See attached memorandum

Wherefore, I Rian Waters request that this court either order the clerk's office to assemble the record, or alternatively report the matter.

Respectfully submitted,

Rian Waters
Rian Waters

12/4/19 RW

199 Allen St E. Longmeadow

(530)739-8951

Watersrian@gmail.com Dated: November 6th, 2019

Certificate Of Service

I, Rian Waters, hereby certify that on November 6th, 2019, I served the above motion by mailing U.S. first class, to:

Kevin Chrisanthopoulos, Esq.
KC Law
30 Court Street, Suite 1
Westfield, MA 01085

Subscribed under the penalties of perjury.

Dated November 6th, 2019

Rian Waters

12/19/19 RW