

COMMONWEALTH OF MASSACHUSETTS

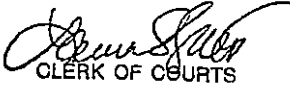
HAMPDEN COUNTY,

1879CV0344

RIAN WATERS,
Plaintiff

AIDAN KEARNEY,
Defendant

MRCP 4.1 Attachment
HAMPDEN COUNTY
SUPERIOR COURT
FILED
OCT 28 2021



CLERK OF COURTS

Plaintiff's Amended Ex Parte Motion to Attach Defendant's Bank Accounts

Pursuant to MRCP 4.1, I Pro se plaintiff Rian Waters, move for this court to approve the attachment of Defendant Aidan Kearney's personal TD Bank account, and his TD Bank business bank account (Turtleboy Digital Marketing LLC,¹ (which is dissolved)) in the amount of \$10,000 each (\$20,000 total.) The court should grant the attachment because there is a reasonable likelihood that I will recover judgment in an amount equal to or greater than the amount of the attachment, Aidan Kearney does not have any relevant insurance, and there is a clear danger that the defendant if notified in advance of attachment of the

¹See Exhibit A&B. Kearney changed Turtleboy Digital Marketing LLC's name to Worcester Digital Marketing LLC on 12/06/2016, but he has kept the original name for his bank account.

property will convey it, remove it from the state or will conceal it. See Memorandum and affidavit.

Wherefore,

This court should approve the ex parte attachment of Kearney's personal and business TD Bank accounts in an amount of \$10,000 each.

Respectfully Submitted,

Rian Waters  10/28/2021

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