

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY,

Superior Court
1879CV0344

RIAN WATERS,
Plaintiff

AIDAN KEARNEY,
Defendant

HAMPDEN COUNTY
SUPERIOR COURT
FILED

OCT 21 2020

[Signature]
CLERK OF COURTS

Plaintiff's motion for a protection order.

I, Rian Waters, move for this court to use it's inherent power to protect me and ensure that my case is heard with some conformity to the laws. Aidan Kearney has clearly violated the perjury, witness intimidation, and wiretapping statutes to obstruct this case, and because of his symbiotic relationship with law enforcement I have been defenseless. Hon. Justice Kathryn E. Hand granted me leave to file, and the court leave to consider a protection order on June 11th, 2020. After this court denied the protection order Aidan Kearney published photos with my face placed on gay porn again. Without a protection order there is a clear and present danger that Aidan Kearney will harass me before oral arguments to hinder my performance, and that he will harass other witnesses involved. The established methods in the statutes and rules have so far failed to discourage obstructive misconduct. See also the attached Memorandum and affidavit.

I ask that after hearing this court order Aidan Kearney:

- A. retract every article that was written about me, and either change the name or retract every podcast with my name in the title until 10 days after final adjudication.
- B. Whatever else the court deems appropriate.

To clarify, I am okay with Aidan Kearney discussing the case on other mediums not directly connected to his blog, as long as it is in a non-threatening manner, and that he does not post links, or allow others to post links to the discussion on any of his blogs or associated social media accounts.

Submitted by,

Rian Waters 6/30/2020

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