

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SOUTH BOSTON DISTRICT COURT
DOCKET(S): 2603RO00041
2603RO00045

MEREDITH O'NEIL

PLAINTIFF

V.

AIDEN KEARNEY

DEFENDANT

V.

MEREDITH O'NEIL

PLAINTIFF'S MOTION TO IMPOUND AND LIMIT PUBLIC ACCESS TO HEARING

NOW COMES the Plaintiff, Meredith O'Neil, by and through her counsel, Thomas A. Dougherty, III and respectfully moves this Honorable Court to impound the upcoming hearing and limit public access thereto.

On March 23, 2026, Plaintiff filed a Complaint for Protection from Abuse pursuant to M.G.L. c. 209A, supported by an affidavit (hereinafter, the "Initial Affidavit"), and was granted a restraining order (the "Initial Order"). On that same date, Plaintiff also filed a Motion for Impoundment, which was allowed by Judge Velez. On March 24, 2026, Judge Velez issued a Further Order of Impoundment. On March 30, 2026, Defendant filed his own application for a restraining order and was granted a Cross order (the "Cross Order"), supported by his affidavit

and upon information and belief presented by his lawyer Mr. Bradl (the “Defendant’s Affidavit”).

In support of this Motion, Plaintiff states that the Court has already impounded her Initial Affidavit due to the presence of highly sensitive and personal material, including private communications, information pertaining to her minor child, and intimate subject matter. Plaintiff has made every effort to keep this matter private and to have it adjudicated solely through the Court. As set forth in her supplemental affidavit filed April 7, 2026 (“Supplemental Affidavit”), Plaintiff did not publicly announce the existence of her order and took steps to avoid further dissemination of sensitive information.

In contrast, Defendant has repeatedly publicized these proceedings, including announcing the existence of the Initial Order and Subsequent Order, disseminating his affidavit, and repeatedly sharing the time and location of the hearing with his substantial online audience. Defendant has openly encouraged attendance at the hearing, including on April 7, 2026, when he invited his audience to attend and “show their anti-Merrorism,” (“anti-Merrorism” is a euphemism for ‘terrorism’ or terrorize Plaintiff Meredith O’Neil), thereby encouraging hostility toward Plaintiff in connection with these proceedings. Defendant has also publicly characterized his own restraining order filing as a “tactic,” approximately two days before the April 8, 2026 hearing demonstrating that he is not acting out of genuine fear or in good faith, but rather using the court process as part of an ongoing online fiasco/terrorism campaign against Plaintiff in an effort to maintain online relevance for himself or maybe as an overall ‘tactic’ in defending his myriad open criminal matters.

The dissemination of Defendant’s Affidavit and related materials has already resulted in significant harm, including renewed harassment, threats, and an attempt to interfere with Plaintiff’s professional license and employment, as evidenced in the Supplemental Affidavit. These proceedings have been exploited as content by Defendant and his associates, including Jessica Machado, Tom Derosier, and Paul Seidenzahl (also known as “Purple Kool-Aid”), all of whom operate monetized online platforms and have used Plaintiff’s personal circumstances, court filings, and appearances as material for public broadcasts, ridicule, and harassment at the request of Aiden Kearney or “Turtle Head”. Plaintiff, by contrast, is a private individual whose employment and personal safety and safety of her daughter are directly impacted by this continued public exposure, and she faces ongoing risk of further and perhaps irreparable harm.

THE JOURNALIST ARGUMENT

Ms. Jessica Machado has registered with the court as a ‘Journalist’. As documented in Plaintiff’s Supplemental Affidavit previously submitted, she has engaged in months of targeted harassment against Plaintiff on behalf of and at the request of Turtle Head. He often ‘reposts’ her diatribe on his so called ‘show’. Machado and Kearney mentioned her daughter, including contacting Plaintiff’s employer and publicly mocking her by instructing her audience to call her “5150”¹ online recently. On March 31, 2026, she publicly read Defendant’s Affidavit in support of his ‘cross-order’ to thousands of viewers and proceeded to post the Subsequent Order containing Plaintiff’s **unredacted residential address** to over 44,000 followers, leaving Plaintiff in fear for her safety and that of her minor daughter. Ms. Machado announced she’d start selling merchandise reading “31 reasons why,” referencing the 31 paragraphs of Defendant’s Affidavit,

¹The term “5150” refers to a police code associated with involuntary psychiatric commitment in another state. Ms. Machado has instructed her viewers to use this term in reference to Plaintiff, effectively mocking Plaintiff’s mental health; this label has since been widely adopted by Mr. Kearney and his followers over the past several months.

further demonstrating the manner in which these proceedings are being used for public ridicule and entertainment and actions of further coercive control of the Ms. O'Neil. At the hearing on April 8, 2026, Machado continued to use the proceedings as online content, including mocking Plaintiff's appearance and was live chatting during the court proceeding under the fraudulent guise of "journalism".

INCIDENTS IN AND OUTSIDE OF THE COURTROOM ON APRIL 8, 2026

The proceedings have already devolved into a spectacle. The Court was alerted to attempts to record and stream the hearing, including through Zoom access, by individuals seeking to broadcast the proceedings online. The court was made aware that hundreds of people were attempting to 'Zoom' in for the hearing. Court officers were required to address individuals attempting to record within the courthouse and ordered at least one person out of the Court during the hearing for violating the Court's directive on this issue.

LAWYER ACCOSTED IN THE HALL

Attorney Dougherty was also confronted by two women in the hall after the hearing concluded on April 8, 2026 where one of them said I'm with Turtle or something like that then proceeded to try and poke attorney Dougherty in the eyes and said I am watching you I saw you. Yet another Turtle Head, who identified himself as such, now known to be one Tom Derosier, who is publicly associated with and endorsed by Defendant on his cite on numerous past occasions, confronted Plaintiff and her counsel outside the doors of the Court and began to push attorney from behind yelling "I'm filming here" and verbally assaulted attorney Dougherty and threatened him with physical harm. He was threatening to attack the lawyer and said "you want to go!" necessitating a defensive posture to defend himself and responded with the same. The

assistance of the Court Officer was required who opened the door and expertly quelled the situation. The individual then followed Plaintiff and Atty. Dougherty down the street filming and recording them, without permission, followed them down the street while yelling at Atty. Dougherty and Ms. O'Neil, and subsequently stated that he intended to determine where counsel resides and go to his home. This conduct represents a serious escalation and raises significant concerns regarding intimidation and safety and perhaps criminal conduct and the integrity of the court environment. Mr. Derosier has broadcast all of this behavior on his YouTube channel, where he can be seen saying²:

"I'm ready to go and go find out where he's living."

"He's got two hearing aids. He's gonna need two walking aids if he keeps that up."

"I'm gonna get him!"

This sophomoric conduct exhibited by Kearney and these other people at his request not only impacts Plaintiff, but also creates a chilling effect on witnesses and makes a mockery of court proceedings. Individuals who may otherwise provide testimony or support could be placed in fear of being targeted, harassed, or followed, thereby undermining the integrity of the judicial process. Defendant Kearney has also publicly mocked prior court proceedings and judicial officers on his platform, further demonstrating his pattern of using publicity to undermine and exploit court processes for content. This conduct raises serious concern that continued public access will be used not only to harass Plaintiff and witnesses, but also to disrupt and undermine the integrity of these proceedings. All under the banner of First Amendment protections

²Representative video clips depicting the conduct outside the courthouse, which have been widely circulated on social media, are included here for the Court's reference. For ease of reference, links are provided; the underlying clips have been preserved and are available for production upon request.

<https://x.com/yngblkeconomist/status/2041927094771310796?s=20>

<https://x.com/MafiaMasshole/status/2041915018984239476?s=20>

something his lawyer will no doubt raise as a defense in this case and perhaps in Kearney's criminal cases.

Another individual present in the court room on April 8, 2026 was Paul Seidenzahl. He has a documented history of targeting Plaintiff through online content on Turtle Heads 'air time' designed to damage Ms. O'Neil's employment and reputation and has made statements directed at Plaintiff in connection with these proceedings, further contributing to the coercive control of the Plaintiff O'Neil and creating an intimidating environment surrounding this case. As documented extensively in ¶6 of Supplemental Affidavit of Ms. O'Neil, Mr. Seidenzahl told the Plaintiff on March 30, 2026, in reference to the April 8, 2026 hearing³:

"And again, Mere, **you still have time to abort mission sweetheart**. Ok? You still have time to come to your senses."

"You better think long and hard, Mere, about what you're about to do. You better think long and hard about the road you're about to go down. Because it could easily end up in fucking disaster for you. Disaster. **Imagine the public shaming you will get**. Imagine how stupid you're gonna look. Imagine how much of a moron you're gonna look like."

"You're gonna fucking lose. And it's gonna be the biggest loss of your life because **he's gonna be tap dancing all over your little fucking grave**. So, there's still time Mere, go ahead, go ahead, it's not gonna work out the way you think. It never does."

"Do you really wanna go down this road 5150? Do you really wanna step in that batter's box and take swings at these 100 mile per hour fast balls that are gonna be coming right at your head? "

³ Video evidence of Mr. Seidenzahl's statements toward Plaintiff was previously provided to the Court on April 7, 2026, via a hard copy drive labeled "Media Attachment 5," and is also included in the shareable folder linked below for ease of access.
https://drive.google.com/file/d/198EvuDhy01DKGlcPvmJjv14p3qetBW1w/view?usp=drive_link

“She better think long and hard if she wants to do this.”

“It is a very distinct possibility that she is going to go down in fucking flames. **Proceed at your own risk Meredith.** Proceed at your own risk, Meredith O’Neil CPA”

“So I want you to think real long and hard, Meredith, about the court filings you just made, cause all those fucking lies, all those lies that you put in yours, are gonna get exposed.”

All of this was played on the internet with Turtle Head i.e. Defendant Kearney visible on the online chat box on the web page leading up to this hearing.

As documented in the Plaintiff’s Supplemental Affidavit, Defendant has also engaged in conduct directed at witnesses and individuals involved in this case. Most recently, on April 7, 2026, after learning that an individual was referenced in Plaintiff’s Supplemental Affidavit as a potential witness, that individual was contacted by a third party closely associated with Defendant. This reflects a pattern in which Defendant discloses or signals the identities of witnesses and asks for retribution.

The cumulative effect of Defendant’s conduct has been to transform these proceedings into a public spectacle, resulting in ongoing harassment, intimidation, and safety concerns for Plaintiff, her minor child and potential witnesses.

Pursuant to the Uniform Rules on Impoundment Procedure, Trial Court Rule VIII, this Court has authority to impound proceedings upon a showing of good cause. Rule 7 contemplates that the Court may hold a hearing prior to entering an impoundment order; however, Rule 3(a) expressly permits ex parte impoundment upon the filing of a motion supported by affidavit demonstrating that immediate and irreparable harm may result before a party can be heard. Here, Plaintiff initially satisfied that standard in obtaining impoundment of her Initial Affidavit. Since

that time, the conduct of Defendant and his associates—including the public dissemination of court materials, harassment, intimidation, and statements made in open court suggesting Plaintiff is abusing the order—has resulted in further irreparable harm and escalation. These developments reinforce, rather than diminish, the need for continued protection and support the extension of impoundment to the hearing itself in order to prevent ongoing misuse/abuse of the processes and further harm to Plaintiff.

Massachusetts courts recognize that the presumption of public access may be overcome upon a showing of good cause, including where necessary to protect privacy, prevent harassment, and preserve the integrity of judicial proceedings. While there is limited case law specifically addressing the impoundment of G.L. c. 209A hearings, this reflects the uncommon nature of parties seeking to publicly broadcast such sensitive abuse prevention matters. This case presents an exceptional circumstance. Here, the Court has already recognized the sensitive nature of the matter, and Defendant’s conduct demonstrates that open access is being used as a vehicle for harassment, intimidation, and interference with the proceedings. Limiting access is therefore necessary to protect Plaintiff’s safety, prevent further harm, and ensure that these proceedings can be conducted fairly and without disruption. See *Republican Co. v. Appeals Court*, 442 Mass. 218 (2004); *Boston Herald, Inc. v. Sharpe*, 432 Mass. 593 (2000).⁴

In related proceedings involving Defendant, the Norfolk County Superior Court, through the Honorable Justice Michael P. Doolin, has already considered and rejected Defendant’s efforts

⁴ The Court in *Republican Co. v. Appeals Court* and *Boston Herald, Inc. v. Sharpe* recognized that access to proceedings may be limited to protect the integrity and fairness of ongoing matters, including criminal proceedings. Notably, those protections were applied in contexts involving defendants’ rights. Here, similar concerns are present, as Defendant is currently facing pending criminal matters, including eight (8) counts of felony witness intimidation and four (4) counts of misdemeanor picketing, while engaging in conduct that risks interfering with participants in these proceedings. Plaintiff also faces potential legal exposure as a result of Defendant’s repeated efforts to initiate criminal complaints against her, including allegations of wiretapping, which further underscores the need to protect the integrity of these proceedings from misuse.

to publicly disseminate materials connected to his cases through a release from impoundment. While those rulings arose in the context of discovery and protective orders, rather than impoundment of hearings or court filings, they are nonetheless highly instructive. The Court found that Defendant has a demonstrated pattern of improperly using confidential materials for public dissemination, specifically noting that even after agreeing to and being subject to multiple protective orders, Defendant continued to publicly share and discuss private information obtained from a witness's cellphone that was unrelated to his defense. The Court further recognized that the Commonwealth proved "Kearney has, in the past, improperly posted content online discussing very private material" and that dissemination of such materials could result in "clearly predictable injuries... likely to be irreparable," and that restrictions were necessary to protect privacy interests and the integrity of the proceedings.⁵ These findings demonstrate that the risk of misuse is not speculative, but has already been recognized by a court, and strongly support limiting public access here to prevent continued harassment, intimidation, and misuse of these proceedings by the Defendant and person that clearly act at his direction, encouragement or request.

FIRST AMMENDMENT CONSIDERATIONS

It is anticipated that some rudimentary argument will be made regarding 'postings' on the internet etc. as being protected by first amendment speech. Counsel reminds the court that in Commonwealth v. Michelle Carter 481 MASS. 352 (2019) a like first amendment argument was made that failed as 'cyber bullying' can and did in that case override concerns of first amendment protection which led to a conviction for Manslaughter by encouraging suicide. See

⁵ See Commonwealth v. Kearney, Norfolk Superior Court, Docket No. 2382CR00313, Memorandum of Decision and Order on Defendant's Motion to Release Documents from Impoundment- Denied (Docket No. 100) ([full memorandum available here](#)).

also Ernest B. Murphy v. Boston Herald, Inc. 865 N.E. 2d 746, 449 Mass 42 (Mass. 2007) SJC docket no. 09782 (2007) The SJC again squarely addresses where First Amendment protections give way to safety concerns. See also, New York Times Co. v. Sullivan, 376 U.S. 254, 279-280, 84 S.Ct. 710, 11 L.ed. 2d 686 (1964) Although the Murphy case dealt with a defamation claim the concepts of first amendment are treated by the SJC as not being as sacrosanct as may be argued in this case. As all law student(s) learn the First Amendment seems sacrosanct however as Oliver Wendell Holmes said, 'you cannot scream fire in a crowded movie theater' Schenck v. United States 249 U.S. 47 (1919) and its progeny.

In further support of this Motion your movant requests this Honorable Court review the attached affidavit of counsel attached.

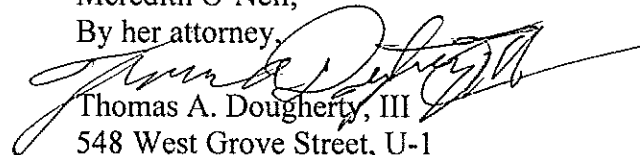
WHEREFORE, the Plaintiff respectfully requests that this Court:

1. Impound the upcoming hearing;
2. Limit public access to the proceedings (Parties and Lawyers and sequestered witnesses only);
3. Restrict attendance to counsel of record, the parties, and necessary witnesses; and
4. Set a Buffer Zone outside of the court at 2:00 PM on Monday afternoon April 13, 2026;
5. Grant such further relief as the Court deems just and meet.

Date:

4/9/26

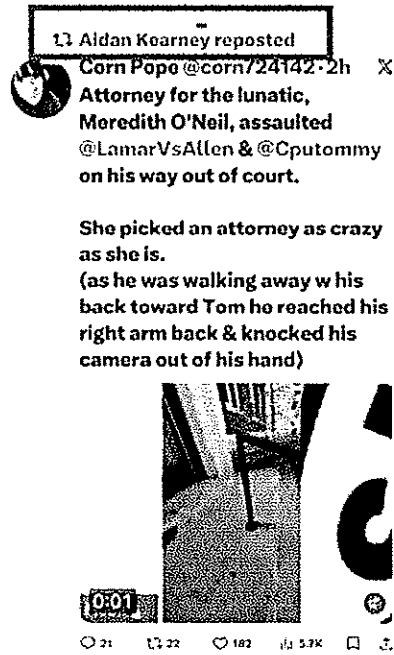
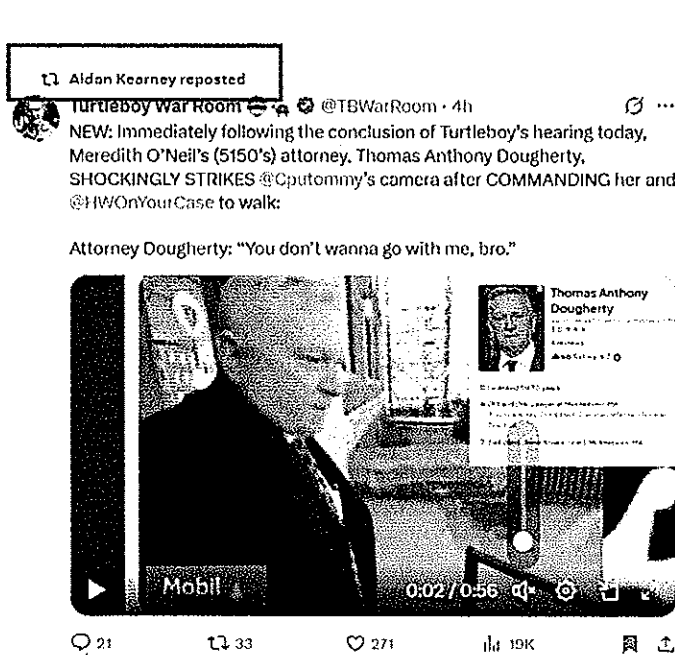
Respectfully Submitted
Meredith O'Neil,
By her attorney,



Thomas A. Dougherty, III
548 West Grove Street, U-1
Middleborough, MA 02346
(508) 583-5454
BBO: 630881
T.dougherty2@verizon.net

EXHIBIT A

Since the hearing, Plaintiff's counsel has experienced ongoing harassment, including confrontations inside and outside the courthouse by individuals associated with Defendant. This has escalated to efforts to report counsel to the Board of Bar Overseers and to solicit negative online reviews, which Defendant has amplified on his platform.



Aidan Kearney reposted

The Dark Passenger @goatcheese... · 1h
Replying to @DLKRising
Do not hire this man 😬

Showing 1 - 2 of 2 reviews (1 star)

Do not hire this man
 Our family hired Mr. Dougherty for a family matter. Unprofessional, uncommunicative, couldn't keep track of our information. Found in Tennessee our names was in a list of past some talking about himself and never returned all of our legal documents. 0/10

Unprofessional
 He basically hung up on me to the extent he can do this unprofessional job.

Thomas Anthony Dougherty's Lawyer Endorsements

Overview Reviews Experience

7 13 45 2.6K

Lala @LalaVonRae · 39m
 Right, it's so pathetic

Chrissy @ChristelScott20 · 1h
 Who is this lawyer?

The Dark Passenger @goatcheese... · 1h
 We are waiting to find out. Apparently the lawyer listed on the docket is not the same guy. I'm sure we'll get confirmation soon!

Chrissy @ChristelScott20 · 1h
 I can't wait to look him up and report him. I don't think I have ever seen a lawyer to come out swinging. Could very well be someone Broyles knows. Shady people

LissaAnn @MAlbaugh9948 · 1h
 She must be so proud

The Dark Passenger @goatcheese... · 1h
 He tried to assault @LamarVsAllen in court today too! Who the hell is this lawyer? I'm going guess Broyles found him!

Following the hearing on April 8, 2026, at approximately 1:28 p.m., Mr. Kearney posted a photograph of himself with Mr. Seidenzahl, both with their fists raised, captioned “guess who’s back on YouTube,” referring to the reinstatement of Mr. Seidenzahl’s channel, which has been used to target Plaintiff through content naming and harassment.



Aidan Kearney
@DoctorTurtleboy

X.com

Guess who's back on YouTube?

@LamarVsAllen



1:28 PM · 4/8/26 · 15K Views

60 69 959

On April 8, 2026, at approximately 8:04 p.m., Mr. Kearney posted on social media referring to Jason Broyles, a known witness in this matter, as “piss boy,” while also discussing the “weaponization” of restraining orders in clear reference to this case, further demonstrating ongoing harassment and targeting of a witness.



Aidan Kearney
@DoctorTurtleboy

Subscribe

Piss boy logic: It's only bad to abuse and weaponize restraining orders against ex boyfriends if your name is Lindsey Gaetani.



Not Hailey Walbrecht @HWOnYourCase · 6h

Replying to @CWvKR_22117

I'm not getting into all of the details on this but reports were made to the police based on incidents that occurred BEFORE the text message. It's certainly not up to her to determine why the person she has a restraining order against was texting her. I'm sure he can make his

8:04 PM · Apr 8, 2026 · 13.8K Views

A sample of social media activity from Mr. Seidenzahl in the short window since the hearing is shown below. Including posting photos from my client at court.

PurpleKoolAidDrinker 12.8K posts

PurpleKoolAidDrinker reposted

Retard Finder-Karen Read Edition @ifindKRietards · 8h
 Commentary account
 Hey Klaus i mean mere, where was your family, retard.

Latest People

Klaus baron · 04 Mar
 Replying to @dasleeve6
 @CrowsRoots and 3 others
 I heard the same. His wife
 family. They never come
 his court dates they hate




9 1.4 64 2.7K

PurpleKoolAidDrinker 12.8K posts

PurpleKoolAidDrinker reposted

Kyla terra @kyla_terra · 7h
 Replying to @LamarVsAllen and @K661734
 He knows this case is a failure. Being unprofessional, petty, and violent is his only way to make up for the retainer. They can drag this out til Monday, but it's inevitable they'll lose BIG.




2 5 33 1K

PurpleKoolAidDrinker reposted

TheBitch256 @TheBitch256 · 6h
 Make this ass famous. He's 5150 attorney that assaulted @LamarVsAllen and @Tomcoo at @DoctorTurtleybey hearing today

Grammy Kisses @SDLRising · 7h
 x.com/goatcheeseball...

Thomas Anthony Dougherty
 also known as TD Law Group Middleboro MA
 3.0 ★★★★★
 4 reviews
 Avvo Rating: 6.7



Licensed for 30 years
 DUI and DWI Lawyer at Middleboro, MA
 Practice Areas: DUI & DWI, Criminal Defense, General Practice
 548 West Grove Street, Unit 1, Middleboro, MA

6 33 103 3.7K

PurpleKoolAidDrinker X.com
 @LamarVsAllen

I'll be home around 10pm. Might fuck around and go live tonight if I can stay awake. Like and subscribe. Be a member. We are just getting started. NOBODY will ever stop me from exposing trash bags. Even attorneys who try to assault people walking out of court. Or their psycho clients like MEREDITH O'NEIL CPA.

PurpleKoolAidDrinker youtube.com/
 @purplekoolaid... via @YouTube

PurpleKoolAidDrinker
 youtube.com

2:42 PM · 4/8/26 · 1.7K Views

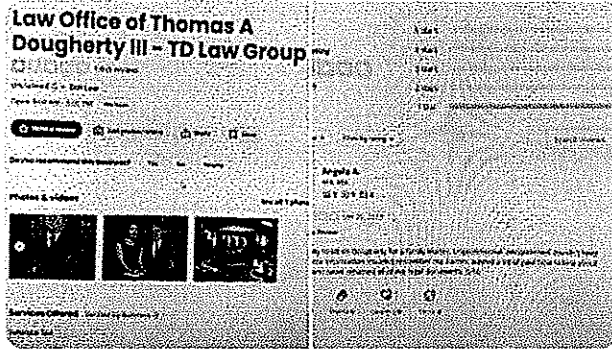
PurpleKoolAidDrinker reposted

Morrissey sucks @Michot68747 · 5h

Replying to @DoctorTurtleboy and @LamarVsAllen

I'm dead!! An OUI ATTORNEY with a one star rating and a cheesy YouTube video seeking clients

youtube.com/watch?v=4JWPkx...



12 11 98 2.7K

PurpleKoolAidDrinker

12.8K posts

Follow

PurpleKoolAidDrinker reposted

That Girl I @little_fool777 · 6h

I expect nothing less from MO's attorney, Thomas Dougherty. He literally knocked @Cputomny camera out of his hands as Tom was trying to hold the door for him and back up out of his way. And from what I hear he hit @LamarVsAllen with his jacket! You have got to be kidding me. Not only that, he was rude as fuck to his own client as they were walking out! And I can't believe she was wearing an IDENTICAL suit to the one Karen Read wore on the day she was acquitted. You just can't make this shit up. In other news, there was no JBrill in sight. 🤔

The court hearing has been postponed to Monday at 2PM. (I've heard 1PM and 2PM so confirm with @DoctorTurtleboy the actual time.)
 #FreeTurtleboy #TomCPU #AssaultonCamera #BostonMA



17 20 210 4.4K

AFFIDAVIT OF COUNSEL

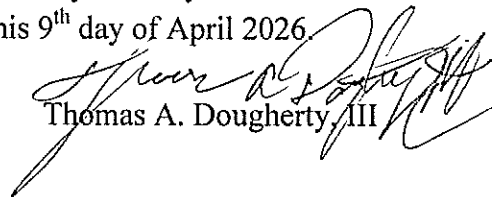
I, Thomas A. Dougherty, III being duly deposed and sworn state the following:

1. My name is Thomas A. Dougherty, III I am licensed to practice law in the Commonwealth and I am in good standing since 1995.
2. I have been consulted and retained by Ms. Meredith O'Neil in the Restraining Order matters in the South Boston District Court;
3. I have reviewed the motion that this affidavit is attached to;
4. I have reviewed what I consider to be relevant case law, statutes and what I believe to be facts observed;
5. I do not personally know either the Defendant Aiden Kearney that goes by the name of Turtle Head, or any of the other persons that are mentioned in the motion;
6. I do not follow any juvenile internet content;
7. I have reviewed the exhibits attached to this motion;
8. After the Judge concluded the hearing she informed us to wait for the updated order in the hall;
9. As I was in the hall with my client two older ladies whom I do not know approached me one of them tried to poke her fingers in my eyes and then said I'm with Turtle head or something like that I saw you, I asked her what her name was and she again repeated I saw you I know who you are so I told her to go screw and she scampered away;
10. As I was holding the doors to the court house open for my young lady client I felt a push form behind and a little old guy with glasses started screaming at me Im fucking filiming here or something like that and I turned around to apologize and he said he was with Turtle head; He then threatened physical harm and I took a defensive stance and asked him if he really wanted to "GO"; He began coming down the stairs at me screaming when luckily a court officer came out and told him to quite down;
11. I left with my client and my witness and he started following me yelling that I have hearing aids and I was going to need walking aids when he was done;
12. He also said I am gonna find out where you live and come to your house;

13. He continue to pursue us but I instructed my client to ignore him and keep walking;

14. Based upon all of the above this motion is brought in good faith

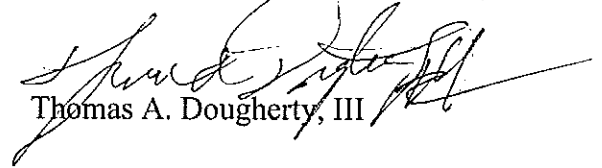
I believe the foregoing to be accurate and true to the best of my memory information and belief. Signed under the pains and penalties of perjury this 9th day of April 2026.



Thomas A. Dougherty, III

CERTIFICATE OF SERVICE

Although I believe this motion may be acted on ex-parte I certify a copy of this motion with attendant memo and exhibits was served on Timothy Bradl via 1st class mail postage prepaid this date. April 9, 2026.


Thomas A. Dougherty, III