

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

SUPERIOR COURT DEPARTMENT

PAUL O'KEEFE, as Personal)
 Representative of the Estate of JOHN)
 JOSEPH O'KEEFE III, PAUL O'KEEFE,)
 Individually, JOHN O'KEEFE II,)
 MARGARET O'KEEFE, and MARGARET)
 O'KEEFE as Grandparent/)
 Guardian of KAYLEY FURBUSH,)

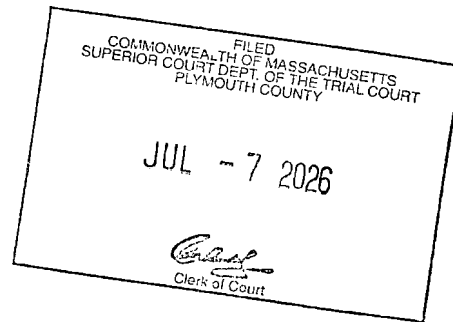
Plaintiffs,

Civil Action No. 2483cv00692

v.

C&C HOSPITALITY, LLC d/b/a C.F.)
 MCCARTHY'S, G&S HOSPITALITY,)
 LLC d/b/a C.F. MCCARTHY'S,)
 WATERFALL BAR & GRILL, LTD d/b/a)
 WATERFALL BAR & GRILL, and)
 KAREN READ,)

Defendants.

**AFFIDAVIT OF JEFFREY T. COLLINS, ESQ.**

I, Jeffrey T. Collins, do hereby depose and state as follows:

1. I am counsel to third party Massachusetts State Police ("MSP") relative to this matter.
2. On June 10, 2026, a Rule 9A package was filed with the Court which included, inter alia, Defendant Karen Read's *Motion to Compel Massachusetts State Police to Produce Documents Pursuant to Non-Party Subpoena* ("Motion"), and MSP's Opposition.
3. No hearing was held on the Motion. Instead, on June 26, 2026 this Court issued an Order on the Motion requiring MSP to produce a privilege log on 4573 email by July 3, 2026.
4. I did not receive a copy of the Order, by either electronic or first class mail, on June 26, 2026, or any day thereafter.

5. I learned of the Order in an email this morning from Attorney Aaron Rosenberg (counsel to Defendant Karen Read), which included a “Notice Concerning Massachusetts State Police Compliance with Court’s Order.”
6. After receiving Attorney Rosenberg’s email this morning, I checked my email inbox for receipt of the June 26, 2026 Order. Inexplicably, I do not have an email from the Odyssey File System, or any other source, with a copy of the Order.
7. I have not received any Orders in this case from the Odyssey File System since becoming associated with the case on or about June 10, 2026.
8. I have contacted the Court and will also engage my IT provider to understand and immediately correct this error.

Respectfully submitted,

MASSACHUSETTS STATE POLICE,

By Its Attorney,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Jeffrey T. Collins

Jeffrey T. Collins (BBO # 640371)
Special Assistant Attorney General
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Dated: July 7, 2026

CERTIFICATE OF SERVICE

I, Jeffrey T. Collins hereby certify that the foregoing was served by email on July 7, 2026 on counsel of record.

/s/ Jeffrey T. Collins
Jeffrey T. Collins