

7-1-2020

149.1

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

SUPERIOR COURT DEPARTMENT

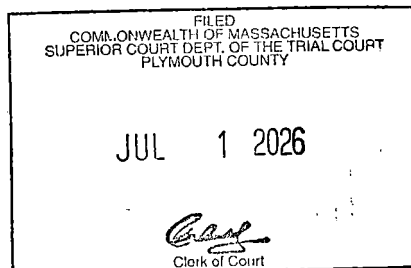
PAUL O'KEEFE, as Personal Representative
of the Estate of JOHN JOSEPH O'KEEFE III,
PAUL O'KEEFE, Individually, JOHN
O'KEEFE II, MARGARET O'KEEFE, and
MARGARET O'KEEFE as Grandparent/
Guardian of KAYLEY FURBUSH,

Plaintiffs,
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.

Civil Action No. 2483cv00692



EMERGENCY MOTION TO CLARIFY THE RECORD

Today, the Court stated on the record that an attorney with an appearance in this case had "violated either the letter or spirit of the Rule." That statement and those that followed were based on an incorrect premise. Namely, the information that the Court claimed had been disclosed by an attorney **was already public as of June 6, 2026 at the latest, more than two days before the filing or impoundment order at issue.** Thus, the entire foundation upon which the Court called today's hearing and admonished counsel was factually flawed.

On June 6, the X user the Court referred to today held a livestream on YouTube during which he stated that he had received the same information from a third party. That was **two days**

before the impounded filing the Court believes was improperly shared. That YouTube Clip is contained on the USB Drive attached as Exhibit 1.

The following posts that also pre-date the June 8th impounded filing also show that the information in question was public prior to that filing:

11:47 5G% 56

← Post ...

 **KY Maverick** @KYMaverick1 · 6/6/26 X
As to Proctor's Deposition:

Which do you believe will most likely happens Monday. Poll ends before Monday Hearing.

Judges grants the motion	25%
Denied & Deposition	51%
Denied & No Drposition	24%

322 votes · Final results

💬 22 ↻ 4 ❤️ 37 📊 3.7K 📌 ⬆

 **Shari Thompson** X.com
@ShariThomp28996

TB was live. The source tho not vetted state that Proctor had been at McClain and transferred to a mental health facility in Florida. If that's true, did he have a nervous breakdown knowing AJ was deposing him? Are the McAlberts concerned he is a weak link?

11:41 PM · 6/6/26 · From Lancaster, PA · 206 Views

💬 ↻ 1 ❤️ 4 📌 ⬆

Post your reply

11:46

5G 56



Post



PettyBoop617
@PettyBoop617

X.com

I'm sorry but if Proctor is in a hospital in Florida
did they not know this before the close of
business on Friday?

7:24 PM · 6/7/26 · 89 Views



Post your reply



The Court departed the bench immediately after making these statements without permitting any counsel to respond. Defendant Karen Read's counsel immediately asked to be heard to inform the Court of these important facts that would correct the record, but the Court refused to allow comment and refused to re-take the bench when asked.

Respectfully submitted,

KAREN READ,

By her attorneys,

/s/ Damon M. Seligson

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Dated: July 1, 2026

CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on July 1, 2026.

/s/ Damon M. Seligson

Damon M. Seligson