

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

**DEFENDANT KAREN READ'S RESPONSE TO COURT REGARDING OPPOSITION
TO MOTION TO QUASH FILED BY NON-PARTY BRIAN TULLY**

In response to the Court's request, Dkt. 135 (the "Request"), Defendant Karen Read ("Read") provides clarification as to two statements contained in her argument against Brian Tully's ("Tully") Motion to Quash, which are presented below along with additional portions of each that clarify Read's meaning and were not included in the Request:

1. "**Apparently**, buoyed by the treatment that other subpoenaed witnesses are getting by resisting their depositions, subpoenaed witness Brian Tully now seeks to stand in the same line by filing a motion seeking to quash his deposition." (Emphasis added.)
2. "Rather, **it appears**, that Tully simply watched the manner in which other subpoenaed parties have been handled in this case." (Emphasis added.)

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them, which will likely leave her forced to conduct a dozen or more depositions during the final month of discovery in this case.

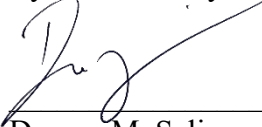
1. On May 20, 2026, Colin Albert informed Read that he would be indefinitely unavailable for deposition after June 2, 2026 and continued to refuse to produce nearly all documents Read sought.
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11. At no point before June 18, 2026 did Tully object to the subpoena's request for responsive documents.

These events form the factual basis for the arguments referred to above.

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KAREN READ

By Her Attorneys:



Damon M. Seligson (BBO# 632763)
Charles M. Waters (BBO# 631425)
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Date: June 29, 2026

CERTIFICATE OF SERVICE

I, Damon M. Seligson, hereby certify that I served a copy of this pleading on all counsel of record by electronic mail on this 29th day of June, 2026.



Damon M. Seligson

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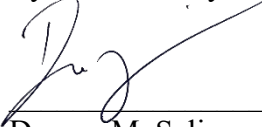
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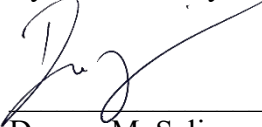
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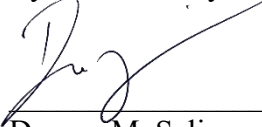
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