

COMMONWEALTH OF MASSACHUSETTS

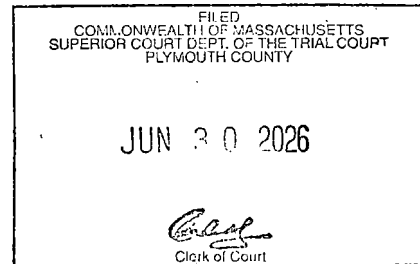
PLYMOUTH, ss.

SUPERIOR COURT DEPARTMENT
C.A. No.: 2483CV00692

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.

**AFFIDAVIT OF DAVID F. HASSETT, ESQUIRE**

I, David F. Hassett, do depose and say:

1. I am an attorney of record for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill, in the above matter, and a member in good standing of the Bar of the State of Massachusetts.
2. On October 3, 2024, I filed my notice of appearance in this matter for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill.
3. I hereby certify that I do not have any facts known to me as to any dissemination to anyone, other than parties and counsel in this matter¹, of any of the contents of the material impounded by Order issued on June 8, 2026 ("Order of Impoundment").

Signed under the pains and penalties of perjury on this 30th day of June, 2026.
David F. Hassett

¹ I am aware that John Dealy has reported to Utica First (liability insurer for Waterfall Bar & Grill, Ltd.) as noted in his Affidavit.

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

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C.A. No.: 2483CV00692

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MARGARET O'KEEFE; and MARGARET O'KEEFE AS
GRANDPARENT/ GUARDIAN OF KAYLEY FURBUSH;
Plaintiffs,

v.

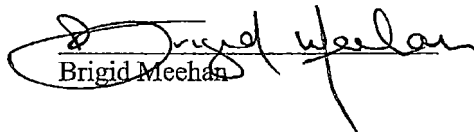
C&C HOSPITALITY, LLC d/b/a C.F. MCCARTHY'S;
G&S HOSPITALITY, LLC d/b/a C.F. MCCARTHY'S;
WATERFALL BAR & GRILL, LTD d/b/a
WATERFALL BAR & GRILL; and KAREN READ;
Defendants.

AFFIDAVIT OF BRIGID MEEHAN FOR WATERFALL BAR & GRILL, LTD

I, Brigid Meehan, do depose and say:

1. I am manager of the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill, in the above matter.
2. I hereby certify that I do not have any facts known to me as to any dissemination to anyone, other than parties and counsel in this matter, of any of the contents of the material impounded by Order issued on June 8, 2026 ("Order of Impoundment").

Signed under the pains and penalties of perjury on this 30th day of June, 2026.


Brigid Meehan

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

SUPERIOR COURT DEPARTMENT
C.A. No.: 2483CV00692

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.

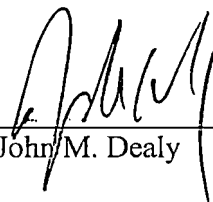
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G&S HOSPITALITY, LLC d/b/a C.F. MCCARTHY'S;
WATERFALL BAR & GRILL, LTD d/b/a
WATERFALL BAR & GRILL; and KAREN READ;
Defendants.

AFFIDAVIT OF JOHN M. DEALY, ESQUIRE

I, John M. Dealy, do depose and say:

1. I am an attorney of record for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill, in the above matter, and a member in good standing of the Bar of the State of Massachusetts.
2. On October 3, 2024, I filed my notice of appearance in this matter for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill.
3. I hereby certify that I do not have any facts known to me as to any dissemination to anyone, other than parties and counsel in this matter,¹ of any of the contents of the material impounded by Order issued on June 8, 2026 ("Order of Impoundment").

Signed under the pains and penalties of perjury on this 30th day of June, 2026.



John M. Dealy

¹ On June 12, 2026, I reported to the adjuster at Utica First (liability insurer for Waterfall Bar & Grill, Ltd.) that Mr. Proctor's counsel "filed an Emergency Motion for Protective Order seeking to continue the deposition date due to health/personal issues." On June 29, 2026, I reported to Utica First regarding the deposition of Michael Proctor conducted on June 25, 2026.

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

SUPERIOR COURT DEPARTMENT
C.A. No.: 2483CV00692

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.

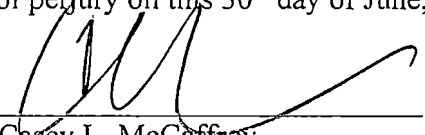
C&C HOSPITALITY, LLC d/b/a C.F. MCCARTHY'S;
G&S HOSPITALITY, LLC d/b/a C.F. MCCARTHY'S;
WATERFALL BAR & GRILL, LTD d/b/a
WATERFALL BAR & GRILL; and KAREN READ;
Defendants.

AFFIDAVIT OF CASEY L. MCCAFFREY, ESQUIRE

I, Casey L. McCaffrey, do depose and say:

1. I am an attorney of record for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill, in the above matter, and a member in good standing of the Bar of the State of Massachusetts.
2. On October 3, 2024, I filed my notice of appearance in this matter for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill.
3. I hereby certify that I do not have any facts known to me as to any dissemination to anyone, other than parties and counsel in this matter,¹ of any of the contents of the material impounded by Order issued on June 8, 2026 ("Order of Impoundment").

Signed under the pains and penalties of perjury on this 30th day of June, 2026.



Casey L. McCaffrey

¹ I am aware that John Dealy has reported to Utica First (liability insurer for Waterfall Bar & Grill, Ltd.) as noted in his Affidavit.

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

SUPERIOR COURT
CIVIL ACTION NO. 2483CV00692

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.

AFFIDAVIT OF JOHN A. DONOVAN III, ESQ.

I, John A. Donovan III, do depose and say:

1. I am an attorney of record for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill, in the above matter, and a member in good standing of the Bar of the Commonwealth of Massachusetts.
2. On December 10, 2024, I filed my notice of appearance in this matter for the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill.
3. I hereby certify that I do not have any facts known to me as to any dissemination to anyone, other than parties and counsel in this matter, of any of the contents of the material impounded by Order issued on June 8, 2026 ("Order of Impoundment").

Signed under the pains and penalties of perjury on this 30th day of June, 2026.

/s/ John A. Donovan III

John A. Donovan III, BBO #631110
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Fax: 617-227-0927
jdonovan@sloanewalsh.com