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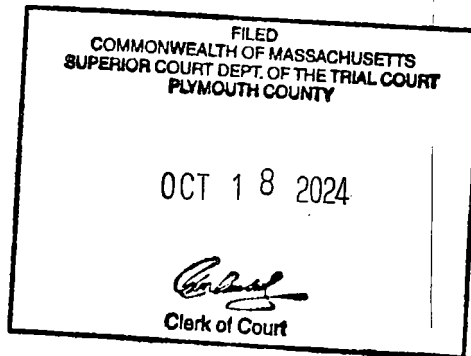
PLYMOUTH, ss.

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.



DEFENDANT WATERFALL BAR & GRILL, LTD d/b/a
WATERFALL BAR & GRILL'S MOTION TO STAY
PENDING RESOLUTION OF RELATED CRIMINAL TRIAL

NOW COMES the defendant, Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill ("Waterfall") and respectfully moves for a stay in this matter pending the outcome of the related criminal case, *Commonwealth v. Karen Read*, Case No. 2282CR00117, which is scheduled for trial on January 27, 2025. Waterfall maintains that staying this matter in its entirety pending the criminal trial will preserve the parties' and witnesses' resources, promote judicial economy, and carries little risk of prejudice to the Plaintiffs. Waterfall further relies on its memorandum of law in support of its motion to stay, filed simultaneously herewith.

WHEREFORE, the Waterfall Bar & Grill, Ltd d/b/a Waterfall Bar & Grill respectfully requests that this Court grant this motion and stay this matter pending the resolution of the related criminal case.

Respectfully Submitted,

Defendant, Waterfall Bar & Grill, LTD d/b/a
Waterfall Bar & Grill
By its Attorneys,

/s/ David F. Hassett

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Dated: October 3, 2024

CERTIFICATE OF SERVICE

I, David F. Hassett, counsel of record for the Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill, in this action, hereby certify that a true copy of the foregoing document was served via electronic and first-class mail, postage pre-paid, this 3rd day of October, 2024 to the following counsel of record:

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/s/ David F. Hassett

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