

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

SUPERIOR COURT DEPT.
C.A. NO. 2483CV00692

PAUL O'KEEFE, INDIVIDUALLY & AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF JOHN
JOSEPH O'KEEFE, III; MARGARET O'KEEFE,
INDIVIDUALLY AND AS GRANDPARENT / GUARDIAN
OF KAYLEY FURBUSH; and JOHN O'KEEFE, II,
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.

**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL FURTHER
ANSWERS TO PLAINTIFF JOHN O'KEEFE II'S FIRST SET OF
INTERROGATORIES TO DEFENDANT KAREN READ**

NOW COME the Plaintiffs in the above-captioned matter, and respectfully request that this Honorable Court, pursuant to Rule 37 of the Massachusetts Rules of Civil Procedure and other relevant rules governing discovery, issue an order compelling Defendant Karen Read (hereinafter "Read") to provide further answers to Plaintiff John O'Keefe II's First Set of Interrogatories served on March 17, 2026. As grounds, Plaintiffs state the following:

I. RELEVANT BACKGROUND

On March 17, 2026, Plaintiff John O'Keefe II served his First Set of Interrogatories upon Defendant Karen Read. [*See Exhibit A*]. Rather than providing substantive answers, Read responded with baseless objections that the requested information is "irrelevant", "private", "constitutes an improper fishing expedition," "privileged" and is "unduly burdensome". [*See*

Exhibit B]. Counsel for Plaintiff conferred with counsel for Read on May 13, 2026, to resolve this dispute without court intervention. Despite good faith efforts, the parties remain at an impasse.

Throughout the discovery process, Read has engaged in a persistent pattern of discovery evasion and delay that has required court intervention and prejudiced Plaintiffs' ability to prepare their case. On September 19, 2025, Plaintiff Paul O'Keefe, as Personal Representative of the Estate of John Joseph O'Keefe III served the Estate's First Set of Interrogatories upon Read. Responses were due by November 3, 2025, but Read failed to respond timely. After Plaintiffs served a Final Request for Answers, Read provided a vague, evasive, non-responsive answer, forcing Plaintiffs to file a Motion to Compel Further Answers. At defense counsel's request, Plaintiffs agreed to hold their motion in abeyance and serve a rephrased supplemental interrogatory. Read again provided an evasive response that failed to comply with the rules ultimately forcing Plaintiffs to file a Motion to Compel Further Answers [*See Docket no. 58*]. Plaintiffs now face the same problem yet again.

II. LEGAL STANDARD

"Each interrogatory shall be answered separately and fully in writing under the penalties of perjury" and said answers "are to be signed by the person making them." Mass. R. Civ. P. 33(a)(3) (emphasis added). In effectuating the goal of discovery, "the purpose of interrogatories is twofold: (1) to procure evidence or secure information as to where pertinent information exists and can be obtained, and (2) to narrow the issues." *Dononvan v. Sundstrom*, 18 Mass. L. Rptr. 168 at *1 (2004), citing *Alamo Theatre Company v. Lowe*, 22 F.R.D. 42, 45 (N.D. Ill. 1958) Mass. R. Civ. P. 37(a)(2) provides, in pertinent parts, "if a party fails to answer an interrogatory submitted under rule 33...the discovering party may move for an order compelling an answer...in accordance with the request." Moreover, responses deemed incomplete and/or

evasive must be treated as a failure to respond. See, Mass. R. Civ. P. 37(a)(3). The courts' negative attitude towards evasive discovery techniques is consistent with and derived from the Supreme Court's interpretation and enforcement of the rules of discovery. "'Discovery' is one of the working tools of the legal profession... It seems clear and long has been recognized that discovery should provide a party access to anything that is evidence in his case." Strom v. American Honda Motor Co., Inc., 423 Mass. 330, 335-336 (1996) (citing Hickman v. Taylor, 329 U.S. 495, 515, 67 S.Ct. 385, 396, 91 L.Ed. 451 (1947)). The modern instruments of discovery "serve a useful purpose ...They, together with pretrial procedures, make a trial less a game of blind man's bluff and more a fair contest with the basic issues and facts disclosed to the fullest practicable extent." Strom, at 335 (citing United States v. Proctor & Gamble Co., 356 U.S. 677, 62, 78 S.Ct. 983, 2 L.Ed.2d 1077 (1958))

III. ARGUMENT

Defendant Read's objections to Plaintiff John O'Keefe II's interrogatories are meritless and represent a continuation of her pattern of discovery obstruction in this litigation. The interrogatories submitted seek narrowly tailored information that is directly relevant to Plaintiffs' claims. Interrogatories Nos. 1 and 2 and their corresponding answers are as follows:

"INTERROGATORY NO. 1: For a two (2) year period before January 29, 2022 through the present, please identify your primary care physician, including for each such physician the date range which physician served as your primary care provider."

ANSWER NO. 1:

OBJECTION. Ms. Read's medical health is not in issue in this action, and therefore, she objects to this Interrogatory on the grounds that it (i) seeks information that is irrelevant and immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26; (ii) seeks medical information that is private in nature and is protected by state and federal law; and (iii) is solely interposed for an improper and unwarranted fishing expedition that is intended to harass and burden

her by seeking irrelevant information about which she has a reasonable expectation of privacy.

“INTERROGATORY NO. 2: For each and every medication, whether prescription or over the counter, that you were taking, had been prescribed, or had access to on January 28-29, 2022, please answer:

- a) The name(s) of the medication (brand and/or generic);
- b) The dosage and frequency of use;
- c) The date(s) such medication(s) were first prescribed or obtained by you;
- d) The condition or purpose for which such medication(s) were prescribed or used;
- e) Identify the prescribing physician or healthcare provider (if prescription);
- f) Identify the pharmacy where the medication was filled (if prescription); and
- g) Whether you took said medication(s) on January 28-29, 2022. And if so, the time(s) and dosage(s) taken.”

ANSWER NO. 2:

OBJECTION. Ms. Read’s medical health is not in issue in this action, and therefore, she objects to this Interrogatory on the grounds that it (i) seeks information that is irrelevant and immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26; (ii) seeks medical information that is private in nature and is protected by state and federal law; and (iii) is solely interposed for an improper and unwarranted fishing expedition that is intended to harass and burden her by seeking irrelevant information about which she has a reasonable expectation of privacy.

Read’s blanket refusal to provide any substantive response to Interrogatories Nos. 1 and 2 is legally unjustified. At the 9C meet and confer on May 13, counsel for Karen Read maintained the objections to Interrogatories Nos. 1 and 2 and refused to provide anything further regarding them. As demonstrated below, these interrogatories seek information that is directly relevant to the central issues in this case.

A. Read’s Medical Condition Is Directly At Issue In This Litigation

Read’s primary objections to Interrogatories Nos. 1 and 2 are that her medical health is “not in issue” and that the information sought is (1) irrelevant; (2) private and protected; and (3) a fishing expedition. [*See Exhibit B*]. Each objection fails. First, Read’s relevance objection ignores the central theory of Plaintiffs’ case. This wrongful death action arises from Read’s alleged operation of a motor vehicle while impaired, causing John O’Keefe III’s death. Plaintiffs must prove Read’s

physical and mental condition on January 28-29, 2022, including her level of intoxication and any additional factors that may have enhanced her impairment. Evidence of medications prescribed to Read and/or that she ingested on the night in question is directly relevant to establishing her state of mind, her physical condition, and her ability to operate a motor vehicle. Read's own father expressed sufficient concern about the medications available to Read that he told a 911 operator "she needs to be in protective custody she suffers from MS ...boatload of pills because of her condition and she could take an overdose..." This statement, made in close temporal proximity to John O'Keefe III's death, demonstrates that Read had access to significant quantities of medication. Plaintiffs are entitled to discover what those medications were, and whether Read ingested them on the night in question.

Second, Read's privacy objection provides no legal basis for withholding discovery. There is no absolute privilege barring discovery of medical information in civil litigation. The information sought in these interrogatories is reasonably calculated to lead to the discovery of admissible evidence. If Read had legitimate privacy concerns, she could have sought a protective order under Rule 26(c). Instead, she has provided Plaintiffs with a blanket refusal.

Third, Read's "fishing expedition" objection mischaracterizes Plaintiffs' narrowly tailored requests. Interrogatory No. 1 seeks only the identity of her primary care physician, from whom Plaintiffs will seek medical records. This request is basic information that parties routinely disclose in litigation.

Interrogatory No. 2 limits its request to the medications prescribed and/or taken during a 48-hour period on January 28-29, 2022. This very limited time frame does not constitute a fishing expedition; rather, it is narrowly tailored to discover factors that may have affected Read's impairment on the night of John O'Keefe III's death, which is directly at issue in this matter.

Interrogatory No. 3 and its corresponding answer are as follows:

“INTERROGATORY NO. 3: For each purchase / transaction you made on January 28-29, please answer.

- a) The purchase / transaction;
- b) Identify the financial institution, credit card company, third party vendor or App you used to satisfy the purchase / process the transaction (e.g. bank account, financial account, credit card account, debit card account, and/or payment platform, including but not limited to checking accounts, saving accounts, credit cards, debit cards, and any third party payment vendors or services.);
- c) The type of account;
- d) The account number;
- e) The name in which the account is/was held;
- f) The address of the financial institution or vendor; and
- g) The approximate date and time for each purchase / transaction.”

ANSWER NO. 3:

OBJECTION. Ms. Read objects to this Interrogatory as overbroad, unduly burdensome, and seeking information that is irrelevant and immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26. Ms. Read also objects to this Interrogatory to the extent it seeks information subject to the attorney-client privilege, work product doctrine, or any other recognized privilege or protection.

Subject to and without waiving these objections, and based on her current knowledge and recollection, Ms. Read states that she had depository or credit accounts with the following banks and credit card companies during the time listed in this Interrogatory: Bank of America and Barclays.

Read’s response to Interrogatory No. 3 is equally deficient. While she identifies two financial institutions, she refuses to provide the specific transaction information requested, instead interposing a litany of objections that have no application to the straightforward discovery sought. During the 9C conference on May 13, counsel for Read stated that she would provide Plaintiff with additional bank information and data including: the account number, account type, name in which the account was held, any third-party vendor or application used to make purchases, and the address of the financial institution. To date, no such information has been provided to Plaintiffs.

B. Read’s Financial Transaction Records For A 48 Hour Period Are Discoverable And Relevant To Establishing Her Whereabouts And Consumption

Interrogatory No. 3 requests information regarding Read's purchases and transactions for the same two-day period, January 28-29, 2022. Read objects that this request is "overbroad," "unduly burdensome," "irrelevant and immaterial," and "protected by attorney client privilege" and/or "work product." First, Read's burden objection is meritless. Reviewing credit card statements for a 48-hour period is a minimal task, one that Read can readily obtain from her financial institutions which have been identified in her answer. This limited two-day time frame renders the request proportional to the needs of this case and is not unduly burdensome.

Second, Read's relevance objection ignores the central issues in this case. Her purchases and transactions on those dates are directly relevant to establishing any consumption that may impact her intoxication level, her whereabouts, and her movements on January 28-29, 2022. This information strikes at the heart of Plaintiffs' claims and falls squarely within the scope of discovery.

Third, any claims of attorney client privilege, and or work product are equally baseless. Credit card statements have no privileged information as they do not contain attorney client communications, nor are they materials prepared in anticipation of litigation. These are records kept in the ordinary course of business that were likely created in January 2022, years before any litigation existed.

IV. REQUESTED RELIEF

WHEREFORE, the Plaintiffs respectfully request that this Court: (1) GRANT this Motion to Compel Further Answers; (2) ORDER Read to serve full and complete answers to Interrogatories Nos. 1 and 2 of Plaintiff John O'Keefe II's First Set of Interrogatories within ten (10) days of the entry of this Order; (3) ORDER Read to serve a full and complete supplemental answer to Interrogatory No. 3, consistent with her representations during the May 13, 2026 meet and confer,

within ten (10) days of the entry of this Order; and (4) GRANT any such other and further relief as this Court deems just and appropriate.

PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER

Respectfully submitted, Plaintiffs,
By Their Attorney,
/s/ Marc Diller
Marc Diller, Esq. BBO # 644997
DILLER LAW, LLP
50 Congress St. Suite 420
Boston, MA 02109
(617) 523-7771
marc@dillerlaw.com

CERTIFICATE OF SERVICE

I, Marc Diller, hereby certify that on this day a true copy of the within document was served upon all counsel of record via E-Mail to:

***Counsel for Defendants, C&C Hospitality,
LLC d/b/a C.F. McCarthy's and G&S
Hospitality, LLC d/b/a C.F. McCarthy's***

Tamara Smith Holtslag, Esq.
Lincoln A. Rose, Esq.
PEABODY & ARNOLD LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-951-2012
Tel: 617-951-2069
tsmith@peabodyarnold.com
lrose@peabodyarnold.com

***Counsel for Defendant, Waterfall Bar & Grill,
LTD d/b/a Waterfall Bar & Grill***

David F. Hassett, Esq.
John M. Dealy, Esq.
Casey L. McCaffrey, Esq.
HASSETT & DONNELLY, PC
446 Main Street, 12th Floor
Worcester, MA 01608
Tel: 508-791-6287
dhassett@hassettdonnelly.com
jdealy@hassettdonnelly.com
cmccaffrey@hassettdonnelly.com

***Counsel for Defendant, Waterfall Bar & Grill,
LTD d/b/a Waterfall Bar & Grill***

John A. Donovan, III, Esq.
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
Tel: 617-523-6010
Fax: 617-227-0927

Counsel for Defendant Karen Read

Charles Waters, Esq.
Damon M. Seligson, Esq.
Aaron D. Rosenberg, Esq.
SHEEHAN PHINNEY BASS AND GREEN PA
20 State Street, 22nd Floor
Boston, MA 02109
Tel: 617-897-5600
cwaters@sheehan.com

jdonovan@sloanewalsh.com

dseligson@sheehan.com
arosenberg@sheehan.com

Elizabeth S. Little, Esq.
Caleb E. Mason, Esq
Alan Jackson, Esq.
WERKSMAN JACKSON & QUINN LLP
888 West Sixth Street, 4th Floor
Los Angeles, CA 90017
Tel: (213)688-0460
Elittle@werksmanjackson.com
Cmason@werksmanjackson.com
Ajackson@werksmanjackson.com

Dated: 6/9/26

/s/ Marc Diller
Marc Diller, Esq.

EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

PLYMOUTH, ss.

CIVIL ACTION № 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.

PLAINTIFF, JOHN O'KEEFE II, FIRST INTERROGATORIES PROPOUNDED UPON
DEFENDANT KAREN READ

Pursuant to Rule 33 of the Massachusetts Rules of Civil Procedure, the Plaintiffs, Paul O'Keefe, individually and as Personal Representative of the Estate of John J. O'Keefe, III; John O'Keefe, II; Margaret O'Keefe, individually and as grandparent/guardian of Kayley Furbush, request that the Defendant Karen Read answer the following Interrogatories under oath:

INSTRUCTIONS

Rule 33(a) requires that each interrogatory must be answered separately and fully in writing under the penalties of perjury, unless it is objected to, in which event the reasons for the objection must be stated in lieu of the answer. Each answer or objection must be preceded by the interrogatory to which it responds. The answers must be signed by the person making them. Objections made to any interrogatory must be signed by the person or attorney making them. The party upon whom the interrogatories have been served must serve a copy of the answers and objections, if any, within 45 days after the service of the interrogatories, and must forthwith file the original answers.

In answering these interrogatories, you are required to make full and complete answers. You must include in your answers all information that you know or that is available to you, including any and all information that you can obtain from (1) making inquiry of your principals, agents employees, attorneys, representatives, any persons acting or purporting to act on your behalf, and any other persons in active concert and participation with you or with them, whether past or present and without regard to whether or not their relationship with you currently exists or has been terminated, and (2) tangible things in your possession, custody, or control that in any way refer to or relate to the information sought by these interrogatories.

Each interrogatory is to be construed as asking for the source of any information provided in your answer thereto, including the identification of each person from whom you obtained any information provided in your answer and a description of any documents or tangible things relied upon by you in making your answer. Unless otherwise specifically so stated in your answer, your answer will be deemed a statement by you of your own knowledge.

If you sue or are sued in more than one capacity or if your answers would be different if suing or sued in any different capacity, such as an agent, corporate officer, or direct partner, or the like, then you are required to answer separately in each capacity.

You are required, if you object to any interrogatory on the grounds of privilege, work product, trade secret, or on any other grounds, to state for each such objection the precise nature of the objection made and a co

DEFINITIONS

1. Defendant/You: The terms “Defendant” and “you” shall refer to Karen Read and, where applicable, shall be construed to include all agents, contractors, representatives, attorneys, and/or other persons acting on behalf of or for the benefit of Karen Read at any point from January 28, 2022, through the present.
2. Identify: The term “identify” when referring to a person shall mean to state the person’s full name, telephone number, and address. When referring to a business or entity “identify” shall mean to state its full legal name, principal address and identity of a person with knowledge of relevant facts. Lastly, when referring to an item/document/material “identify” shall mean to state its title, name or description.

INTERROGATORIES

INTERROGATORY NO. 1

For a two (2) year period before January 29, 2022 through present, please identify your primary care physician, including for each such physician the date range which physician served as your primary care provider.;

INTERROGATORY NO. 2

For each and every medication, whether prescription or over the counter, that you were taking, had been prescribed, or had access to on January 28-29, 2022, please answer:

- a) the name(s) of the medication (brand and/or generic);
- b) the dosage and frequency of use;
- c) the date(s) such medication(s) were first prescribed or obtained by you;
- d) the condition or purpose for which such medication(s) were prescribed or used;
- e) Identify the prescribing physician or healthcare provider (if prescription);
- f) Identify the pharmacy where the medication was filled (if prescription); and
- g) whether you took said medication(s) on January 28-29, 2022. And if so, the time(s) and dosage(s) taken.

INTERROGATORY NO.3

For each purchase / transaction you made on January 28-29, please answer

- a) the purchase /transaction
- b) identify the financial institution, credit card company, third party vendor or App you used to satisfy the purchase / process the transaction (e.g. bank account, financial account, credit card account, debit card account, and/or payment platform, including but not limited to checking accounts, saving accounts, credit cards, debit cards, and any third party payment vendors or services.)
- c) the type of account
- d) the account number
- e) the name in which the account is/was held
- f) the address of the financial institution or vendor; and
- g) the approximate date and time for each purchase / transaction.

Respectfully submitted,
Plaintiff, Paul O'Keefe
as Person Representative of the
Estate of John Joseph O'Keefe, III,
By and through counsel:

/s/ Marc Diller
Marc Diller, Esq. BBO # 644997

DILLER LAW, LLP
50 Congress Street, Suite 420
Boston, MA 02109
(617) 523 – 7771
MDiller@DillerLaw.com

CERTIFICATE OF SERVICE

I, Marc Diller, Esq., do hereby certify that on this 3/17/26 a true and complete copy of the foregoing documents was served upon all counsel of record via E-MAIL.

/s/ Marc Diller
Marc Diller, Esq.

EXHIBIT B

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

**ANSWERS TO PLAINTIFF JOHN O'KEEFE II'S FIRST
INTERROGATORIES PROPOUNDED UPON DEFENDANT KAREN READ**

Defendant Karen Read ("Ms. Read") answers the Interrogatories propounded upon her by
Plaintiff, John O'Keefe II ("Plaintiff"), as follows:

OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

For a two (2) year period before January 29, 2022 through present, please identify your primary care physician, including for each such physician the date range which physician served as your primary care provider.

ANSWER NO. 1:

OBJECTION. Ms. Read's medical health is not in issue in this action, and therefore, she objects to this Interrogatory on the grounds that it (i) seeks information that is irrelevant and immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26; (ii) seeks medical information that is private in nature and is protected by state and federal law; and (iii) is solely interposed for an improper and unwarranted fishing expedition that is intended to harass and burden her by seeking irrelevant information about which she has a reasonable expectation of privacy.

INTERROGATORY NO. 2:

For each and every medication, whether prescription or over the counter, that you were taking, had been prescribed, or had access to on January 28-29, 2022, please answer:

- a) the name(s) of the medication (brand and/or generic);
- b) the dosage and frequency of use;
- c) the date(s) such medication(s) were first prescribed or obtained by you;
- d) the condition or purpose for which such medication(s) were prescribed or used;
- e) Identify the prescribing physician or healthcare provider (if prescription);
- f) Identify the pharmacy where the medication was filled (if prescription); and
- g) whether you took said medication(s) on January 28-29, 2022. And if so, the time(s) and dosage(s) taken.

ANSWER NO. 2:

OBJECTION. Ms. Read's medical health is not in issue in this action, and therefore, she objects to this Interrogatory on the grounds that it (i) seeks information that is irrelevant and

immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26; (ii) seeks medical information that is private in nature and is protected by state and federal law; and (iii) is solely interposed for an improper and unwarranted fishing expedition that is intended to harass and burden her by seeking irrelevant information about which she has a reasonable expectation of privacy.

INTERROGATORY NO. 3:

For each purchase / transaction you made on January 28-29, please answer.

- a) the purchase /transaction
- b) identify the financial institution, credit card company, third party vendor or App you used to satisfy the purchase / process the transaction (e.g. bank account, financial account, credit card account, debit card account, and/or payment platform, including but not limited to checking accounts, saving accounts, credit cards, debit cards, and any third party payment vendors or services.)
- c) the type of account
- d) the account number
- e) the name in which the account is/was held
- f) the address of the financial institution or vendor; and
- g) the approximate date and time for each purchase / transaction.

ANSWER NO. 3:

OBJECTION. Ms. Read objects to this Interrogatory as overbroad, unduly burdensome, and seeking information that is irrelevant and immaterial to the facts, issues, claims and defenses in this action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26. Ms. Read also objects to this Interrogatory to the extent it seeks information subject to the attorney-client privilege, work product doctrine, or any other recognized privilege or protection.

Subject to and without waiving these objections, and based on her current knowledge and recollection, Ms. Read states that she had depository or credit accounts with the following banks

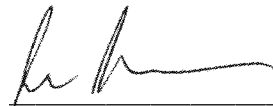
and credit card companies during the time listed in this Interrogatory: Bank of America and Barclays.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY
ON APRIL 30, 2026.



KAREN READ

As to objections:



/s/ Arthur E. Maravelis

Arthur E. Maravelis (BBO# 564673)
Thomas M. Tang (BBO# 642578)
Sarah A. Shipley (BBO# 678753)
Michael W. Bell (BBO# 697529)
TANG & MARAVELIS, P.C.
111 South Bedford Street, Suite 200
Burlington, MA 01803
(781) 221-1400
amaravelis@tangmaravelis.com
ttang@tangmaravelis.com
sshipley@tangmaravelis.com
mbell@tangmaravelis.com

Damon M. Seligson (BBO# 632763)
Charles M. Waters (BBO# 631425)
Aaron D. Rosenberg (BBO# 684826)
Sheehan Phinney Bass & Green, PA
28 State Street, 22nd Floor
Boston, MA 02109
617.897.5600
dseligson@sheehan.com
cwaters@sheehan.com
arosenberg@sheehan.com

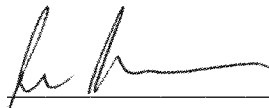
WERKSMAN JACKSON & QUINN LLP

Alan J. Jackson, *pro hac vice*
Caleb E. Mason, *pro hac vice*
Elizabeth S. Little, *pro hac vice*
Werksman Jackson & Quinn LLP
888 West Sixth Street, Fourth Floor
Los Angeles, CA 90017
(213) 688-0460
ajackson@werksmanjackson.com
cmason@werksmanjackson.com
elittle@werksmanjackson.com

Dated: April 30, 2026

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all counsel of record by email on
April 30, 2026.

A handwritten signature in black ink, appearing to read 'A. Rosenberg', is written over a horizontal line.

Aaron D. Rosenberg