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**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**

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

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

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Counsel for Defendant Karen Read

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Marc Diller

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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.

PLAINTIFFS' MOTION TO COMPEL RESPONSES TO PLAINTIFFS'
SUPPLEMENTAL KEEPER OF RECORDS SUBPOENA
FROM AIDAN KEARNEY

NOW COME the Plaintiffs in the above-captioned matter, and hereby move this Honorable Court, pursuant to Rule 45 of the Massachusetts Rules of Civil Procedure and other relevant rules governing discovery, to issue an order compelling Aidan Kearney to produce all documents and materials responsive to Plaintiffs' Supplemental Keeper of Records Subpoena. On April 21, 2026, Aidan Kearney was served a Supplemental Keeper of Records Subpoena which superseded and replaced in its entirety a prior records subpoena served upon him on April 14, 2026. As of the date of service, Plaintiffs have yet to receive responses, objections, nor any request for extension from Aidan Kearney.

The grounds for Plaintiffs' motion and the relief sought are set forth in greater detail within the accompanying Memorandum in Support thereof.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER

Date: 6/3/26

Respectfully submitted, Plaintiffs,
By Their Attorney,
/s/ Marc Diller
Marc Diller, Esq. BBO # 644997
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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:

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Dated: 6/3/26

/s/ *Marc Diller*

Marc Diller, Esq.

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

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

PAUL O'KEEFE, INDIVIDUALLY & AS PERSONAL
 REPRESENTATIVE OF THE ESTATE OF JOHN
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 INDIVIDUALLY AND AS GRANDPARENT / GUARDIAN
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 WATERFALL BAR & GRILL, LTD *d/b/a* WATERFALL
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Defendants.

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Date: 6/3/26

Respectfully submitted, Plaintiffs,
By Their Attorney,
/s/ Marc Diller
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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:

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Dated: 6/3/26

/s/ *Marc Diller*

Marc Diller, Esq.