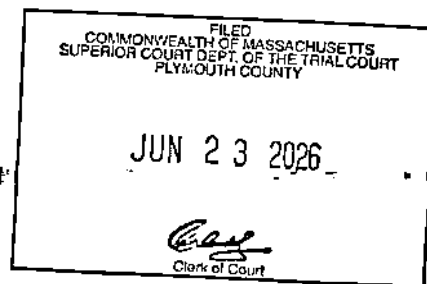


PLYMOUTH, ss. COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO. 2483CV00692

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



NOTICE OF INTENT TO FILE PURSUANT TO SUPERIOR COURT RULE 9A

Please take notice that the Non-Party Witness, Lt. Brian Tully (Ret.), has served upon counsel for Karen Read the following documents, pursuant to Rule 9A of the Massachusetts Superior Court Rules:

- Motion to Quash Subpoena and/or For Protective Order; and
- Written Objections to the Subpoena Duces Tecum and Deposition Subpoena to Non-Party Witness, Lt. Brian Tully (Ret.).

In accordance with Rule 9A, the moving party will file the motion, together with any opposition and reply, after the expiration of the time permitted for filing opposition papers.

Respectfully submitted,

For the Non-Party Witness, Lieutenant Brian Tully (Ret.),
By his attorneys,

Dated: June 18, 2026

/s/ Timothy M. Burke

Timothy M. Burke, Esq., BBO# 065720
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2026, this document is being sent via first class mail to the Plymouth Superior Court Clerk's Office, 52 Obery Street, Plymouth, MA 02360. Email copies will be sent to counsel for Defendant Karen Read by electronic mail, directed to:

Damon M. Seligson, Esq.
Charles M. Waters, Esq.
Aaron D. Rosenberg, Esq.
Sheehan Phinney Bass & Green, PA
28 State Street, 22nd Floor
Boston, MA 02109

/s/ Timothy M. Burke
Timothy M. Burke, Esq.