

COMMONWEALTH OF MASSACHUSETTS

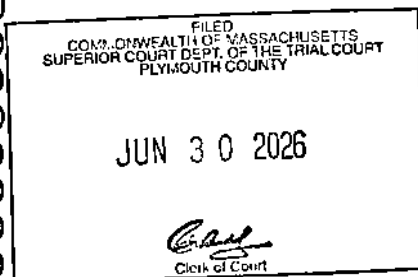
PLYMOUTH, SS.

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 On April 21, 2026, Aidan Kearney was served a Supplemental Keeper of Records Subpoena which superseded and replaced in its entirety a prior records subpoena served upon him on April 14, 2026.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.

(7.3.26 Subpoena, J) Allowed. See Decision and Order Paper Number 151. Attach Genuine Biers, Susan Clerk