

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,)

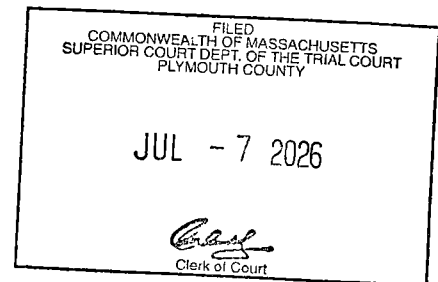
Plaintiffs,

) Civil Action No. 2483cv00692

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.



**MASSACHUSETTS STATE POLICE EMERGENCY MOTION TO EXTEND
 DEADLINE TO COMPLY WITH JUNE 26, 2026 COURT ORDER**

Unbeknownst to third party Massachusetts State Police ("MSP"), and its counsel, on June 26, 2026, this Court issued an Order on Defendant Karen Read's *Motion to Compel Massachusetts State Police to Produce Documents Pursuant to Non-Party Subpoena*. It was not until receipt and review of an email this morning (Tuesday, July 7, 2026) from Attorney Aaron Rosenberg (counsel to Defendant Karen Read), which included a "Notice Concerning Massachusetts State Police Compliance with Court's Order" that counsel learned of the June 26 Order, which required MSP to produce – by July 3, 2026 – a privilege log concerning 473

privileged/attorney work-product protected emails withheld from production in response to the third party subpoena.

Attached is an Affidavit from undersigned counsel outlining non-receipt of the Court's June 26, 2026 Order (or any Orders from the Court since MSP's involvement in this case). Given that neither MSP nor its counsel received the June 26, 2026 Order, MSP requests an extension of the July 3, 2026 deadline – to July 14, 2026 – to comply with the Court's Order.

MSP sought Defendant Karen Read's assent to this motion. Defendant Read did not respond.

Respectfully submitted,

MASSACHUSETTS STATE POLICE,

By Its Attorney,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Jeffrey T. Collins

Jeffrey T. Collins (BBO # 640371)
Special Assistant Attorney General
MORGAN, BROWN & JOY, LLP
28 State Street, 16th Floor
Boston, MA 02109
(617) 788-5024
jcollins@morganbrown.com

Dated: July 7, 2026

CERTIFICATE OF SERVICE

I, Jeffrey T. Collins hereby certify that the foregoing was served by email on July 7, 2026 on counsel of record.

/s/ Jeffrey T. Collins
Jeffrey T. Collins