

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

SUPERIOR COURT DEPARTMENT

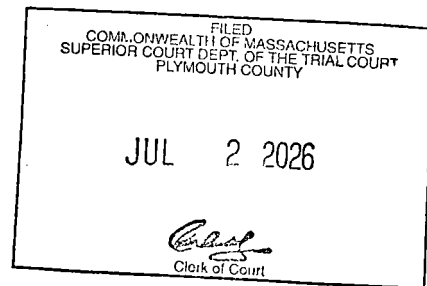
PAUL O'KEEFE, as Personal Representative
of the Estate of JOHN JOSEPH O'KEEFE III,
PAUL O'KEEFE, Individually, JOHN
O'KEEFE II, MARGARET O'KEEFE, and
MARGARET O'KEEFE as Grandparent/
Guardian of KAYLEY FURBUSH,

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



**DEFENDANT KAREN READ'S SUPPLEMENTAL MEMORANDUM OF LAW IN
SUPPORT OF EMERGENCY MOTION TO CLARIFY THE RECORD**

After the Court's emergency hearing on July 1, 2026, and after filing her Emergency Motion to Clarify the Record that same day, Defendant Karen Read became aware that the X post that the Court cited as the only evidence that its impoundment order had been violated was actually posted **before** the relevant June 8, 2026 filing by third party Michael Proctor ("Proctor"). The Court stated at hearing that Proctor's counsel sent the relevant pleading and exhibits to the Court and counsel at 2:22 pm on June 8 and that the X post in question was created "exactly thirty minutes after the email to counsel of record" and contained information "similar" to the information contained in Proctor's filing. That is incorrect.

As the Court can see below, the X post in question, which was provided to the Court by Proctor's counsel, was created at **10:52 am Eastern Time**. The image provided by Proctor's counsel had a 2:52 pm timestamp. However, that is because it was apparently accessed by a user without an X account, which defaults the time zone to Coordinated Universal Time ("UTC") – four hours ahead of Eastern Time. See <https://docs.x.com/x-ads-api/fundamentals/timezones>. When accessed by a user with an account set to Eastern Time, the post appears as follows:



Aidan Kearney ✓
@DoctorTurtleboy

Subscribe



Michael Proctor decided to have a mental health crisis after the whole world found out how racist he is. Sources tell us he checked himself into a mental health facility in Florida to try to avoid today's deposition. They filed a motion at the last minute on Friday to delay the depo, but the Judge wanted proof. They submitted an affidavit that was impounded because it likely said Proctor was in a mental hospital. Karen Read's lawyer made the mistake of saying the scheduling of the deposition was strategic, which the judge took issue with based on her comments on the Today Show. He stayed the depo for 24 hours and at 4:15 a hearing will be held. My guess is he's gonna tell Proctor to jump on a plane and stop being such a pussy so Alan can depose him tomorrow.

10:52 AM · Jun 8, 2026 · 167.4K Views

The message was actually posted more than three hours before Proctor's filing and not "exactly thirty minutes after" it. Therefore, the Court's conclusion that there has been a violation of its impoundment order is based on a factually inaccurate premise.

The Court's actions as a result of what it incorrectly determined was a violation of its Order has primarily impacted Read, who is the party who subpoenaed Proctor, began taking his deposition, scheduled a second day of testimony, and has spent significant resources compelling

and taking his testimony. Because there is no evidence of any violation of the Court's impoundment order, and because the Court did not permit Read's counsel to present any evidence on this point at the July 1 hearing, the Court should now clarify that no violation took place and permit Read to proceed with her scheduled day of deposition on July 14.

Respectfully submitted,

KAREN READ,

By her attorneys,

/s/ Aaron D. Rosenberg

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

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

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: July 2, 2026

CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on July 2, 2026.

/s/ Aaron D. Rosenberg

Aaron D. Rosenberg