

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

SUPERIOR COURT DEPARTMENT
C.A. 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. 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.

**DEFENDANT, WATERFALL BAR & GRILL LTD.'S
RESPONSE TO PROPOSED ORDER**

In response to the Court's Proposed Discovery Order (Paper No. 157), the Defendant, Waterfall Bar & Grill, Ltd. d/b/a Waterfall Bar & Grill, has no objection to the Court's proposed order as drafted.

Respectfully Submitted,

Defendant, Waterfall Bar & Grill, LTD d/b/a
Waterfall Bar & Grill
By its Attorneys,

/s/ John M. Dealy

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Dated: July 13, 2026

CERTIFICATE OF SERVICE

I, John M. Dealy, counsel of record for the Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill, in this action, hereby certify that a true copy of the foregoing document was served via electronic mail this 13th day of July, 2026 to the following counsel of record:

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