

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

**REPLY IN SUPPORT OF EMERGENCY MOTION FOR RECONSIDERATION OF
ORDER DELAYING DEPOSITION OF MICHAEL PROCTOR**

In her Motion, Read addressed the information the Court referred to as the basis for the Order Read asks the Court to reconsider. The Court entered that Order because it concluded that impounded information had been shared with a nonparty. As explained in Read's Motion there is no evidence that that occurred. Thus, the Order based on that conclusion should be vacated.

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Proctor spent multiple hours outside the office where the deposition took place, and presumably some time outside the office building. Kearney’s post explains that the information he shared made its way to him because Proctor and his counsel were observed in public. Other social media activity provides even more detail about how this information became public:



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I certify that I served a copy of this document on all counsel of record, as well as counsel to third party Michael Proctor, by email on July 9, 2026.

/s/ Aaron D. Rosenberg

Aaron D. Rosenberg