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PLYMOUTH, ss.

SUPERIOR COURT
C.A. NO. 2483CV00692

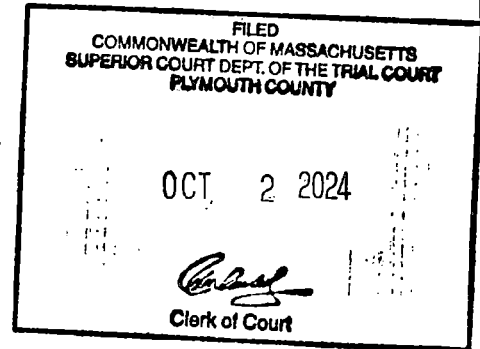
PAUL O'KEEFE, AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
JOHN JOSEPH O' KEEFE III; PAUL O'KEEFE,
INDIVIDUALLY; JOHN O'KEEFE II;
MARGARET O'KEEFE; and MARGARET
O' KEEFE AS GRANDPARENT /
GUARDIAN OF KAYLEY FURBUSH,

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, KAREN READ'S MOTION TO STAY CIVIL PROCEEDINGS
PENDING RESOLUTION OF CRIMINAL TRIAL

The Defendant, Karen Read, respectfully requests a stay of this civil action until conclusion of the pending criminal trial in Norfolk Superior Court, Docket No. 2282CR00117.

The criminal trial involves the same circumstances alleged in this civil matter and is scheduled to begin on January 27, 2025. A stay is appropriate here, where proceeding with this civil action at the same time as the criminal action will adversely affect Ms. Read's Fifth Amendment rights and her ability to vigorously defend herself from criminal prosecution. The requested stay involves minimal delay and is not prejudicial, as the civil tracking order contemplates an August 2026 discovery deadline and August 2027 disposition date. Massachusetts law indicates that a

stay is appropriate in such circumstances. See, e.g., M.K. v. D.B., 102 Mass.App.Ct. 183, 190 (2023)(“in the event of parallel criminal and civil cases, the civil action often will at least partially be stayed until the criminal case has concluded”).

Pursuant to Superior Court Rule 9A(a)(1), a supporting Memorandum is filed together herewith. A hearing is respectfully requested.

Respectfully submitted,

The Defendant,
Karen Read,
By her attorneys,

/s/ William L. Keville, Jr.

William L. Keville, Jr., BBO: #546525
Christopher D. George, BBO: #670428
Marissa K. Palladini, BBO: #713518
Melick & Porter, LLP
One Liberty Square, 7th Floor
Boston, MA 02109
Telephone: (617) 523-6200 Facsimile:
(617) 523-8130
wkeville@melicklaw.com
cgeorge@melicklaw.com
mpalladini@melicklaw.com

Dated: September 19, 2024

CERTIFICATE OF SERVICE

I, William L. Keville, Jr., hereby certify that on this day, I forwarded notice of the foregoing document(s) by electronically mailing a copy thereof, to the following:

Counsel for the Plaintiff

Marc Diller, Esq.
Diller Law, LLP
50 Congress Street, Suite 410
Boston, MA 02109
marc@dillerlaw.com

Defendant

C&C Hospitality, LLC d/b/a C.F. McCarthy's
c/o Steven P. Carey
973 Furnace Brook Parkway
Quincy, MA 02169

Defendant

Waterfall Bar & Grill, LTD d/b/a Waterfall
Bar & Grill
c/o Gerard Meehan
19 Ames Avenue
Canton, MA 02021

Defendant

G&S Hospitality, LLC d/b/a C.F. McCarthy's
c/o Steven P. Carey
614 Washington Street
Canton, MA 02021

/s/William L Keville, Jr.

William L. Keville, Jr.

Dated: September 19, 2024