

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

**KAREN READ'S MOTION FOR ORDER REQUIRING PLAINTIFFS' COUNSEL TO
DESTROY INADVERTENTLY PRODUCED COMMUNICATION**

Defendant Karen Read ("Read") respectfully requests that the Court order Plaintiffs to destroy all copies of an email that she inadvertently sent to Plaintiffs' counsel on December 16, 2025 by accidentally "replying to all" in response to an email on which she was blind copied, which unintentionally included Plaintiffs' counsel on her otherwise-privileged message, which directly related to her legal representation and this case. Despite numerous requests, Plaintiffs' counsel has refused to delete the email or even to temporarily sequester the message while seeking the Court's instructions. Therefore, Read seeks an order requiring Plaintiffs' counsel to delete the message and any copies and recover and ensure deletion of any copies sent to his

clients or anyone else. In support of her motion, Read submits the accompanying Memorandum of Law.

Respectfully submitted,

KAREN READ,

By her attorneys,

/s/ Damon M. Seligson

Damon M. Seligson (BBO# 632763)

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Dated: January 9, 2026

CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on January 9, 2026.

/s/ Damon M. Seligson

Damon M. Seligson