

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

SUPERIOR COURT DEPT.
C.A. NO. 2483CV00692

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

**PLAINTIFF'S REPLY TO DEFENDANT KAREN READ'S OPPOSITION TO THE
MOTION TO COMPEL FURTHER ANSWERS TO INTERROGATORIES FROM
DEFENDANT KAREN READ**

After a failed MA Sup. Ct. R.9(c) conference occurring during the November 21, 2025 hearing, Plaintiff moved to compel Karen Read's Answer to Interrogatory No. 1 which seeks the basis or all facts supporting the subject of Read's Affirmative Defense No. 2.¹ Defendant Read seeks to argue that the motion is moot when she attempts to circumvent the Mass. R. Civ. P. by adding four (4) new sentences to her already defective interrogatory Answer No.1.

¹ Before Defendant Read Answered the complaint, Plaintiff propounded an interrogatory to Read on September 19, 2025 to ferret out the basis for Read's public, not under oath, proclamations that she knows John O'Keefe was killed in the house and by who. Then, on October 21, 2025, Read Answered the complaint and as expected pled that John O'Keefe's injuries/death was "caused by the acts / omissions of 3rd parties for whom Ms. Read is not responsible." See Docket No. 44, Aff. Def. 2

Such Supplemental Answer articulates the following new statements:

- the credible evidence indicates that he was beaten inside the home at 34 Fairview Road in Canton, Massachusetts on the night of January 28-29, 2022 and died as a result.
- The individuals inside the house during the time period surrounding Mr. O'Keefe's death also took actions that suggest wrongdoing, including tampering with, destroying, fabricating and manipulating evidence, all in an effort to direct blame towards me.
- Based on the information and evidence available to me, I believe that one or more of the occupants of the house at 34 Fairview Road, Canton during the early morning hours of January 29, 2022 caused Mr. O'Keefe's death.
- I do not know which specific individual or individuals within the house fatally wounded Mr. O'Keefe.

The Answer, inclusive of these four new sentences, is not compliant with the Rules and/or purpose of discovery.

Mass. R. Civ. P. 30(1)(a)(c)(9) directs:

When an interrogatory calls upon a party to "state the basis" of or "state all facts" concerning a particular claim, allegation, or defense (or uses comparable language), the party shall provide a substantial summary of the factual basis supporting the claim, allegation, or defense at the time the interrogatory is answered. The summary shall: (a) identify the essential acts or failures to act forming the substance of the claim, allegation, or defense, (b) identify the persons and entities that, through firsthand information or possession of documents, are the sources of the party's information regarding the claim, allegation, or defense, and (c) when one or more documents is the basis of the claim, allegation, or defense, such as a written contract in a contractual claim or defense, or a written misrepresentation in a misrepresentation claim, identify (or provide as part of the interrogatory answer a copy of) each such document. In stating the basis, a party may not withhold information from the interrogatory answer because it derives from attorney work product or was obtained in anticipation of litigation if the party intends to offer this information at trial.

Here, Defendant Read's Original Answer together with her Supplemental Answer does not comply with the Rules. Defendant Read cannot make blanket conclusory statements like "the credible evidence indicates..." "(t)he individuals inside the house during the time period

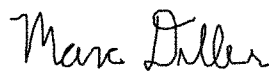
surrounding Mr. O'Keefe's death also took actions that suggest wrongdoing..." and "(b)ased on the information and evidence available to me..." etc. without providing supports.

Defendant Read and her team have engaged in public media campaigns and freely spoken publicly without the consequence of providing under oath testimony. In so doing, Read and her team not only have leaked evidence that now appears inconsistent with the under oath answer signed by Ms. Read, but also have stated publicly that she has evidence to suggest John O'Keefe was killed inside the house.

Plaintiff was not a party to the criminal matter and had no rights to impede the criminal investigation and prosecution. Whereas Defendant Read and her team had a three (3) year head start on gathering evidence, Plaintiff is eager to learn what Defendant knows so it can secure evidence and narrow the issues in Plaintiff's pursuit of Justice for John O'Keefe.

For the reasons stated in his Motion, Plaintiff respectfully requests that the Court grant this Motion to Compel and order Defendant Karen Read to comply with the Rules and to serve a full and complete **under oath** answer to support its Affirmative Defense No. 2.

Respectfully submitted, Plaintiff,
By its Attorney



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