

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

**MOTION TO COMPEL MICHAEL PROCTOR TO PRODUCE
DOCUMENTS PURSUANT TO SUBPOENAS**

Defendant Karen Read ("Read") respectfully requests that the Court compel former Massachusetts State Police Trooper Michael Proctor ("Proctor") to produce documents due as long as three months ago. Read served a subpoena (the "First Subpoena") on Proctor in hand in July 2025. Read also served a second subpoena (the "Second Subpoena") seeking a discrete set of additional documents in October 2025. Proctor acknowledged receiving both Subpoenas and requested repeated extensions to respond. However, to date, Proctor has failed to meet all new agreed-to deadlines and has not substantively responded to either Subpoena or produced any documents. The Court should compel him to do so. In support of this Motion, Read relies on the Memorandum of Law submitted herewith.

WHEREFORE. Read respectfully requests that the Court allow this Motion and compel Proctor to produce all documents and information responsive to the Subpoenas within ten (10) days of the Court's Order.

Respectfully submitted,

KAREN READ,

By her attorneys,



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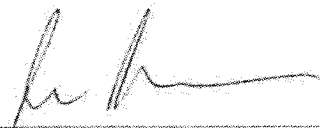
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Dated: November 7, 2025

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all counsel of record by email and on Michael Proctor by hand on November 7, 2025.

A handwritten signature in black ink, appearing to read 'A. Rosenberg', is written over a horizontal line.

Aaron D. Rosenberg

Dated: November 7, 2025