

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.

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER
 ANSWERS TO INTERROGATORIES FROM DEFENDANT KAREN READ**

During the pendency of the three (3) year prosecution of Commonwealth v Karen Read,
 Read and her team conducted active investigation into the death of John O'Keefe, III.

Plaintiff is eager to learn under oath anything that would lead to justice for John O'Keefe.
 Therefore, Plaintiff Paul O'Keefe, as Personal Representative of the Estate of John Joseph
 O'Keefe, III, hereby moves to compel Defendant Karen Read to provide under oath all factual
 information she has to support her affirmative defense that "John O'Keefe's death was caused by
 the acts/omissions of 3rd parties for whom Ms. Read is not responsible." In support thereof,
 Plaintiff states as follows:

I. RELEVANT BACKGROUND

Plaintiff seeks to compel Defendant Karen Read to provide fully under oath all factual
 information known and available to Read in response to Plaintiff's Interrogatory No. 1.

During the three (3) years that Ms. Read defended herself against accusations that she was responsible for the death of John O’Keefe, she and her team consistently and publicly denied any responsibility for his death.

In Defendant Read’s October 21, 2025, Answer to Plaintiffs’ wrongful death Complaint, Read asserted as an Affirmative Defense: “To the extent that plaintiff suffered damages, all such damages claimed were caused by the acts / omissions of 3rd parties for whom Ms. Read is not responsible.” [See, Docket No. 44, Affirmative Defense No. 2]

Such Affirmative Defense is consistent with the very public, not under oath, comments Ms. Read and her representatives made about who, other than her, is responsible for the death of John O’Keefe.

During her 2022 arrest, Karen Read accused Colin Albert and Brian Albert of beating John O’Keefe inside 34 Fairview Rd., Canton.

On May 24, 2023, Ms. Read stood on the Norfolk Superior Court steps and proclaimed to the media, “We know who did it. We know.”¹

In a recent interview with Billy Bush on Hot Mics with Billy Bush, Alan Jackson stated he has a pretty good picture of what did happen to John O’Keefe.²

In Read’s recent complaint filed in Bristol County against eight (8) parties, Read pled that John O’Keefe was killed in the Albert home at 34 Fairview after a night of heavy drinking.

Despite publicly – and in pleadings – asserting that third parties are responsible for the death of John J. O’Keefe III, Defendant Read refuses to provide information under oath that affirmatively supports her pointing the finger at any 3rd party culprits in this wrongful death action.

¹ [Karen Read denies killing Boston police officer John O'Keefe, says 'we know who did it'](#) (from 1:30-1:47)

² [Hot Mics Special! Karen Read's lawyer Alan Jackson LIVE in Person](#) (from 13:08-14:01)

Instead of providing the factual basis supporting her third-party culprit defense as required under the rules of discovery, Ms. Read responded with baseless objections and evasive, unsupported accusations in response to Plaintiff's legitimate interrogatory:

INTERROGATORY #1: Identify each person whom you claim is responsible for the death of John Joseph O'Keefe III, and for each such person, state all facts forming the basis of your claim.

RESPONSE: Ms. Read objects to this Interrogatory as seeking information that is irrelevant to the subject matter involved in the pending action and therefore outside the scope of discovery pursuant to Mass. R. Civ. P. 26(b)(1). Ms. Read is not required to identify the specific person(s) who were responsible for Mr. O'Keefe's death. Ms. Read also objects to this Interrogatory as seeking information outside of her knowledge and possession. Ms. Read is not an investigator or police officer, and is not otherwise responsible for, or skilled in, determining who is at fault for a person's death. Ms. Read further objects to this Interrogatory to the extent it seeks information subject to the attorney-client privilege or work product doctrine or is posed solely for harassment and publicity purposes rather than to elicit legitimate discovery. Subject to, and without waiving these objections, Ms. Read states:

I was acquitted by a jury of all criminal charges relating to the death of John O'Keefe III after a full and public trial that exposed pervasive investigative misconduct and corruption. I did not cause, and am not responsible for, Mr. O'Keefe's death. I did not strike Mr. O'Keefe with my car. The evidence will show that Mr. O'Keefe's wounds appear inconsistent with being hit by a vehicle and consistent with being in a physical altercation and attacked by a dog. The individuals and entities who had the responsibility to fully investigate the circumstances of Mr. O'Keefe's death failed to adhere to their duties, and instead ignored, destroyed, and failed to gather or investigate highly relevant evidence in and around the house at 34 Fairview Road, Canton, Massachusetts after Mr. O'Keefe's body was discovered. They did so because of personal connections between the lead investigator and individuals within that house, as well as the occupants' connections to various local, state, and federal law enforcement agencies. The individuals in the house that night engaged in a concerted effort to direct the investigators' attention away from themselves and towards me instead. Because of the destruction and concealment of key evidence, the truth about what happened to Mr. O'Keefe has been deliberately obscured. What remains undisputed is that I played no part in causing, participating in, or contributing to his death in any way.

[See, **Exhibit 1**]

Under the circumstances and for the reasons set forth below, Plaintiff requests that this Court order that Defendant Read be directed to serve a full and complete answer to Interrogatory No. 1 in compliance with Superior Court Rule 30A.

II. LEGAL STANDARD

“Each interrogatory shall be answered separately and *fully* in writing under the penalties of perjury” and said answers “are to be signed by the person making them.” Mass R. Civ. P. 33(a)(3) (emphasis added). In effectuating the goal of discovery, “the purpose of interrogatories is twofold: (1) to procure evidence or secure information as to where pertinent information exists and can be obtained, and (2) to narrow the issues.” *Dononvan v. Sundstrom*, 18 Mass. L. Rptr. 168 at *1 (2004), citing *Alamo Theatre Company v. Lowe*, 22 F.R.D. 42, 45 (N.D. Ill. 1958)

Mass. R. Civ. P. 37(a)(2) provides, in pertinent parts, “if a party fails to answer an interrogatory submitted under rule 33...the discovering party may move for an order compelling an answer...in accordance with the request.” Moreover, responses deemed incomplete and/or evasive must be treated as a failure to respond. See, Mass. R. Civ. P. 37(a)(3).

The courts’ negative attitude towards evasive discovery techniques is consistent with and derived from the Supreme Court’s interpretation and enforcement of the rules of discovery. “Discovery is one of the working tools of the legal profession... It seems clear and long has been recognized that discovery should provide a party access to anything that is evidence in his case.” *Strom v. American Honda Motor Co., Inc*, 423 Mass. 330, 335-336 (1996) (citing *Hickman v. Taylor*, 329 U.S. 495, 515, 67 S.Ct. 385, 396, 91 L.Ed. 451 (1947)). The modern instruments of discovery, such as interrogatories and document requests, “serve a useful purpose ...They, together with pretrial procedures, make a trial less a game of blind man’s bluff and more a fair contest with

the basic issues and facts disclosed to the fullest practicable extent." *Strom*, at 335 (citing *United States v. Proctor & Gamble Co.*, 356 U.S. 677, 62, 78 S.Ct. 983, 2 L.Ed.2d 1077 (1958)) **Stated another way, "[m]utual knowledge of all the relevant facts gathered by both parties is essential to proper litigating."** *Atlas Tack Corporation v. Donabend*, 47 Mass.App.Ct. 221, 224 (1999) (citing *Strom*, supra, at 336 and *Hickman*, supra, 329 U.S. at 507) (emphasis added).

III. ARGUMENT

Defendant Karen Read's affirmative defense—that third parties are responsible for John O'Keefe's death—demands more than mere assertion; it requires factual support and full transparency. A defendant who affirmatively claims to be absolved of liability by pointing to others must substantiate that claim with specific evidence, not vague speculation. Plaintiffs have a right to know the specific identity of these alleged third parties and the factual basis for such a defense, as mandated by Superior Court Rule 30A and the principles of fair discovery. Yet, despite years of public statements and rhetoric claiming to "know who did it" and the burden of proving her allegations at this civil trial, Ms. Read refuses to provide Plaintiffs with a factual basis supporting such defense, instead offering improper objections and evasive, unsupported accusations. The Court should not permit Ms. Read to shield critical information while simultaneously leveraging it in public and in pleadings. Justice and the integrity of the discovery process require that Ms. Read either disclose the identities and facts supporting her defense or clearly admit she cannot do so. Anything less undermines the fairness owed to all litigants.

A. Defendant Read Has The Burden Of Proving That Someone Else Killed John O'Keefe.

Mass. R. Civ. P. Rule 8(c) governs the pleading of affirmative defenses. The Rule includes among affirmative defenses "any . . . matter constituting an avoidance." As a defense to Plaintiffs' lawsuit for the wrongful death of John O'Keefe, Read not only claims that she is not responsible

for JJ's death, but Read affirmatively contends that "to the extent that Plaintiff suffered damages, all such damages claimed were caused by the acts/omissions of third parties for whom Ms. Read is not responsible." [See, Docket No. 44, Affirmative Defense No. 2] More specifically, Read alleges that individual(s) present in the Albert home at 34 Fairview Road in Canton killed John O'Keefe in an altercation during a late-night house party after a night of heavy drinking.³

Read's affirmative defense, if true, would negate an essential element of Plaintiffs' wrongful death claim, and therefore, Read bears the burden of proving the alleged contrary fact – that someone inside 34 Fairview killed John O'Keefe - at the time of trial. In *Hughes v. Williams*, 229 Mass. 467, 118 N.E. 914 (1918), the Supreme Judicial Court explained the interplay between burden of proof and an affirmative defense:

The statement of the legal principle where the burden of proof rests is plain. The party who makes and is required to make an assertion of a fact in order to set forth a case as matter of law entitling him to prevail, and whose case requires the proof of that fact, has at all times the burden of proving such fact. But where the party upon whom the burden of proof is cast offers competent proof of the fact, and his adversary instead of producing proof to negative that same fact proposes to show another and a distinct fact which avoids the effect of the first fact, then the burden of proof rests upon the party proposing to show the latter fact. This is an affirmative defense, the burden of proving which rests upon the party asserting it.

Id. at 470. See also, *O'Donoghue v. Commonwealth*, 93 Mass. App. Ct. 156, 165 (2018)

The Reporters' Notes to Rule 8(c) state that it requires the defendant to set forth "any facts which would entitle him to be absolutely and unconditionally relieved against the plaintiff's claim or cause of action or against a judgment recovered by the plaintiff in such action." Mass. R. Civ. P. 8(c) citing to G.L. c. 231, Sec. 31. The First Circuit, interpreting the cognate Federal Rule 8(c), said that the purpose of the rule is to provide plaintiffs with adequate notice of a defendant's

³ See, Read v. Proctor, et al, Bristol County Superior Court, CA No. 2573CV00914A, Docket No. 1 at ¶2. On or about November 25, 2025, the Bristol County action was removed to federal court (case 1:25-cv-13588) by the individual "House Defendants". [See, Docket No. 5]

intention to litigate an affirmative defense, thereby affording an opportunity to develop any evidence and offer responsive arguments relating to the defense. *Stoneridge Control Devices, Inc. v. Teleflex, Inc.*, 2004 Mass. Super. LEXIS 23 *12-13 citing *Davignon v. Clemmey*, 322 F.3d 1 (1st Cir. 2003).

Additionally, Rule 11(a) of the Massachusetts Rules of Civil Procedure requires that affirmative defenses only be asserted if there are good grounds to support them, and that they not be interposed for delay. Rule 11(a) provides, in pertinent part: “The signature of any attorney to a pleading constitutes a certificate that the attorney has read the pleading; that to the best of the attorney’s knowledge, information, and belief there is a good ground to support it; and that it is not interposed for delay.”

Defendant Read asserts only a boilerplate affirmative defense that “third parties” are responsible for John O’Keefe’s death. By asserting this defense, Ms. Read implicitly claims to have some factual basis to believe specific third parties caused Mr. O’Keefe’s death. Otherwise, the defense would be made in bad faith. Either Read has no factual basis to support her claim that someone inside 34 Fairview was responsible for John O’Keefe’s death in which case her affirmative defense should be stricken, or she is improperly withholding discoverable evidence relating to her defense and this Court should compel Read to disclose the same.

B. The Factual Basis For Defendant Read’s Affirmative Defense Is Discoverable.

In raising an affirmative defense attributing the death of John O’Keefe to other individual(s), Defendant Read has a legal obligation to provide a substantial summary of the factual basis which Read relies upon in asserting her third-party culprit defense.

Therefore, Plaintiffs are entitled to ask (and did ask) who those third parties are and what facts support the defense. It would defeat the purpose of discovery – and basic fairness – to allow

Ms. Read to raise such a defense but then refuse to divulge its underpinnings. See *Massachusetts Superior Court Civil Practice Manual*, (MCLE Inc. 1997 & Supp. 2002), §3.3.2, Affirmative Defenses (emphasis added):

“When making the decision to include an affirmative defense, the pleader should anticipate an interrogatory asking for the factual basis of that defense. If there is none, then the affirmative defense should not be included.” “Because of the importance of the issue generally, we observe that, in asserting answers and affirmative defenses, parties would do well to reacquaint themselves with, and heed the requirements of, the Rules of Civil Procedure. The [R]ules impose upon an attorney an obligation to certify that there is a good ground to support each pleading. The thoughtless, inattentive assertion of multiple boilerplate defenses, available at the push of a button in the computer age, is a phenomenon of increasing frequency that runs counter to this certification and to the spirit and letter of the [R]ules.” See also, *Martin v. Commonwealth*, 53 Mass. App. Ct. 526, 532-3 (2002).

Plaintiff served a single, narrowly tailored interrogatory asking Ms. Read to: (1) identify each person she claims is responsible for the death of John Joseph O’Keefe, III, and (2) for each such person, ***state all facts forming the basis*** of that claim. Plaintiff’s interrogatory does not seek the disclosure of legal conclusions or privileged communications. Plaintiff merely requests the disclosure of facts allegedly known by Ms. Read which form the basis for her affirmative defense, which is explicitly anticipated and authorized by Superior Court Rule 30A.⁴

Contrary to Defendant Read’s position, Plaintiff’s interrogatory does not seek any information or evidence that is subject to the attorney-client privilege or work product doctrine. The attorney-client privilege “only protects communications between the attorney and the client about [underlying] factual information, not the facts themselves.” *Attorney Gen. v. Facebook, Inc.*, 487 Mass. 109, 123 (2021). Furthermore, the work product doctrine only applies to “documents

⁴ “State the Basis or State all Facts. 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.” See, Superior Court Rule 30A(1)(c)(9).

and tangible things.” *Id.* at 126 (citing *McCarthy v. Slade Assocs., Inc.*, 463 Mass. 181, 194 (2012), quoting P.M. Lauriat, S.E. McChesney, W.H. Gordon, & A.A. Rainer, *Discovery* § 4:5 (2d ed. 2008 & Supp. 2011)).

As the Plaintiff requests only the facts known by Ms. Read that support her affirmative defense, rather than communications with her legal team or tangible materials prepared in anticipation of litigation, such facts are directly relevant to her defense, subject to discovery, and not protected by privilege.

**C. Defendant Read’s Answer To Plaintiff’s Interrogatory Is Unresponsive,
Evasive and Disregards Our Rules Of Discovery.**

On May 24, 2023, Karen Read stood on the courthouse steps at Norfolk County Superior Court, surrounded by a horde of reporters, bloggers, cameras, and microphones. A reporter prompted her, “Just to be clear, Karen, you didn’t do it.” She paused, took a moment, and then with the public’s ear in the palm of her hand, Read announced: “We know who did it, Steve. We know.”⁵

Based on Ms. Read’s public representations and her expressed intention to prove that someone else is responsible for John O’Keefe’s death as part of her defense to this action, the Plaintiff has a legal right to learn the facts that Read relies upon in support of that defense. However, when given the opportunity to disclose these facts under oath—facts Ms. Read has claimed publicly to know for years—she responded with improper objections and evasive non-answers in violation of her discovery obligations.

The Plaintiff’s sole interrogatory tracks the language of Superior Court Rule 30A and requests the same factual details mandated by the Rule. Rule 30A explicitly requires the following:

⁵ [Karen Read denies killing Boston police officer John O’Keefe, says ‘we know who did it’ \(from 1:30-1:47\)](#)

“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.**”

See Mass Superior Court Rule 30A(1)(c)(9).

Ms. Read’s answer contains none of the above-cited information required under Rule 30A. Although Read broadly asserts that she “did not cause” Mr. O’Keefe’s death and speculates that his injuries are “consistent with being in a physical altercation and attacked by a dog,” Read does not identify who allegedly committed those acts, when they occurred, how they occurred, or what specific conduct caused Mr. O’Keefe’s fatal injuries. Ms. Read also fails to identify a single witness with firsthand knowledge who supports her narrative, or any other evidentiary source to support her allegations.

Ms. Read’s conclusory accusations that law enforcement failed to properly investigate, that evidence was allegedly destroyed, and that unnamed individuals redirected investigative attention away from themselves do not constitute a responsive answer to Plaintiff’s interrogatory nor supply any of the factual foundation required by Rule 30A. Simply stated, Read provides no *factual* basis whatsoever to support her affirmative defense that a third-party is responsible for John O’Keefe’s death.

Furthermore, Ms. Read should not be permitted to hide behind improper and baseless objections such as relevance, lack of knowledge, and privilege in order to circumvent her obligation to provide a substantial summary of the factual basis supporting her third-party culprit defense. Plaintiff's interrogatory simply asks Read to disclose the same "truth" about who is responsible for John O'Keefe's death which she has consistently represented to the media and to the public. Ms. Read cannot defend against the Plaintiffs' lawsuit by claiming that an unknown third party caused Mr. O'Keefe's death, while at the same time withholding the identity of that person and the facts supporting her claim—information she has allegedly known for years. Rule 30A is specifically intended to prevent this type of trial-by-ambush and to ensure that litigants are afforded a fair opportunity to develop evidence and to offer responsive arguments relating to the claimed defense.

Ms. Read's evasive response indicates an unwillingness to submit a written, sworn statement about her claimed knowledge of John O'Keefe's death and who was responsible. If Ms. Read is genuinely dedicated to "fighting for the truth of what happened to John O'Keefe", there should be no reason to withhold any information in her possession. The withholding of such information would contravene the letter and the spirit of our discovery rules, which exist to ensure equitable access to all relevant facts obtained by both parties.

At the end of the day, this Court should not allow Ms. Read to defend Plaintiffs' lawsuit on the grounds that an unidentified third-party caused John O'Keefe's death while broadcasting to the media and to the potential jury pool that "we know who did it", without disclosing to Plaintiffs the identity of the culpable individual(s) and the factual basis for Read' affirmative defense.

Either Ms. Read must disclose the identity of the third-party responsible for JJ's death and the factual basis which supports her affirmative defense in compliance with Rule 30A, or if she

cannot identify the person she claims is responsible or provide any factual support, Ms. Read must clearly state the same in her answer so that Plaintiffs may seek to strike that defense. Ms. Read cannot have it both ways.

IV. REQUESTED RELIEF

For the foregoing reasons, Defendant Read's answer to Plaintiff's interrogatory is evasive, incomplete and noncompliant with the governing rules of discovery, and therefore, should be treated as a failure to respond pursuant to Mass. R. Civ. P. 37(a)(3).

WHEREFORE, the Plaintiff respectfully requests that the Court grant his Motion to Compel and order Defendant Karen Read to serve a full and complete answer to Interrogatory No. 1 in compliance with Rule 30A. Specifically, the Court should order Ms. Read to identify the specific individual(s) she claims to know is responsible for John O'Keefe's death and to state in detail all facts supporting such affirmative defense, without objection. In the alternative, if Ms. Read cannot identify a specific individual she claims is responsible or provide any factual support for her defense, she should be required to so answer accordingly.

Plaintiffs also ask that the Court issue any further just relief warranted under the circumstances, including, if appropriate, an order precluding Ms. Read from introducing any evidence or argument of third-party responsibility for Mr. O'Keefe's death if she continues to withhold the identities of the alleged responsible persons in discovery. Such relief would be consistent with the Massachusetts Rules of Civil Procedure and the Court's broad authority to ensure fairness in the discovery process.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER.

Date: 12.2.25

Respectfully submitted, Plaintiffs,
By Their Attorney,

/s/ Marc Diller

Marc Diller, Esq. BBO # 644997

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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the within document was served upon counsel of record via E-MAIL to:

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DATED: 12.2.25

/s/ Marc Diller
Marc A. Diller, Esq.

EXHIBIT 1

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

**ANSWERS TO PLAINTIFF PAUL O'KEEFE, AS PERSONAL REPRESENTATIVE OF
THE ESTATE OF JOHN JOSEPH O'KEEFE III FIRST SET OF INTERROGATORIES
PROPOUNDED UPON DEFENDANT KAREN READ**

Defendant Karen Read ("Ms. Read") answers the Interrogatories propounded upon her by
Plaintiffs as follows.

INTERROGATORY #1: Identify each person whom you claim is responsible for the death of
John Joseph O'Keefe III, and for each such person, state all facts forming the basis of your
claim.

RESPONSE: Ms. Read objects to this Interrogatory as seeking information that is irrelevant to
the subject matter involved in the pending action and therefore outside the scope of discovery
pursuant to Mass. R. Civ. P. 26(b)(1). Ms. Read is not required to identify the specific person(s)
who were responsible for Mr. O'Keefe's death. Ms. Read also objects to this Interrogatory as

seeking information outside of her knowledge and possession. Ms. Read is not an investigator or police officer, and is not otherwise responsible for, or skilled in, determining who is at fault for a person's death. Ms. Read further objects to this Interrogatory to the extent it seeks information subject to the attorney-client privilege or work product doctrine or is posed solely for harassment and publicity purposes rather than to elicit legitimate discovery. Subject to, and without waiving these objections, Ms. Read states:

I was acquitted by a jury of all criminal charges relating to the death of John O'Keefe III after a full and public trial that exposed pervasive investigative misconduct and corruption. I did not cause, and am not responsible for, Mr. O'Keefe's death. I did not strike Mr. O'Keefe with my car. The evidence will show that Mr. O'Keefe's wounds appear inconsistent with being hit by a vehicle and consistent with being in a physical altercation and attacked by a dog. The individuals and entities who had the responsibility to fully investigate the circumstances of Mr. O'Keefe's death failed to adhere to their duties, and instead ignored, destroyed, and failed to gather or investigate highly relevant evidence in and around the house at 34 Fairview Road, Canton, Massachusetts after Mr. O'Keefe's body was discovered. They did so because of personal connections between the lead investigator and individuals within that house, as well as the occupants' connections to various local, state, and federal law enforcement agencies. The individuals in the house that night engaged in a concerted effort to direct the investigators' attention away from themselves and towards me instead. Because of the destruction and concealment of key evidence, the truth about what happened to Mr. O'Keefe has been deliberately obscured. What remains undisputed is that I played no part in causing, participating in, or contributing to his death in any way.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON NOVEMBER 4,
2025.



KAREN READ

Dated:

As to objections,



Arthur E. Maravelis (BBO# 564673)

Thomas M. Tang (BBO# 642578)

Sarah A. Shipley (BBO# 678753)

Michael W. Bell (BBO# 697529)

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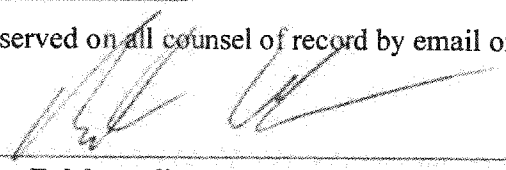
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Dated: November 4, 2025

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all counsel of record by email on November 4, 2025.



Arthur E. Maravelis