

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 SGT. SEAN GOODE TO PRODUCE DOCUMENTS
IN RESPONSE TO SUBPOENA**

Defendant Karen Read ("Read") respectfully requests that the Court compel Sergeant Sean Goode ("Sgt. Goode") of the Canton Police Department to produce all documents in his possession, custody, or control that are responsive to the subpoena Read served on him more than a month ago. On November 7, 2025, Read served a subpoena (the "Subpoena") on Sgt. Goode at his last known residential address.¹ The Subpoena required Sgt. Goode to produce documents by November 15, 2025. As of the date of filing, Sgt. Goode has not responded to Read's subpoena in any manner and the deadline to do so has long passed.

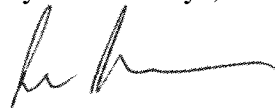
¹ True and accurate copies of the Subpoena and the related Affidavit of Service are attached as collective Exhibit 1 to the Read's Memorandum of Law in Support of this Motion.

WHEREFORE, Read respectfully requests that the Court allow this Motion and compel Sgt. Sean Goode to produce all documents responsive to the Subpoena within ten (10) days of such order.

Respectfully submitted,

KAREN READ,

By her attorneys,



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Dated: December 9, 2025

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all counsel of record by email and on the Sgt. Sean Goode by hand on December 9, 2025.



Aaron D. Rosenberg

Dated: December 9, 2025