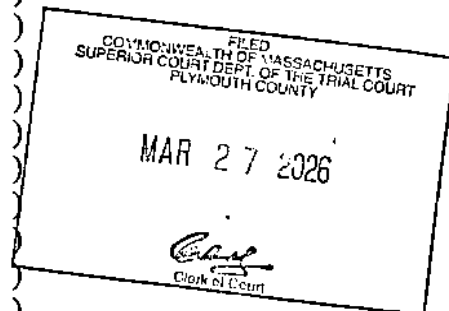


PLYMOUTH, SS. COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPT.
C.A. NO. 2483CV00692

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.



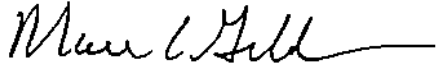
STIPULATION BETWEEN DEFENDANT KAREN READ AND PLAINTIFFS

- 1) Whenever the phones seized from Karen Read by State Police in 2024 and held by the Commonwealth since that time are returned to her, they will be turned over to Sheehan Phinney prior to anyone booting the phones, operating or using them. A mutually agreed upon forensic expert will create a Full File System extraction of the phones before either phone is booted, operated or used by anyone (with the exception of the boot required for the extraction to occur.)
- 2) "Full File System extraction" means the most complete extraction which is able to obtain all live files from the device including , but not limited to, evidence of factory reset(s) of the phone(s), system activity, secure messaging (e.g., Signal), deleted records and boot events.
- 3) There will be no unnecessary boot events or device use prior to extraction, but should they be required, the forensic expert will provide full documentation (i.e., take photographs/video) of any activity.
- 4) The device(s) will be maintained in a radio isolated state (i.e., removal of SIM & denying network connectivity) until after the extraction.
- 5) The device(s) will be maintained in a radio isolated state until the extraction(s) are completed.

- 6) The forensic expert will take photographs of each device upon booting - paying specific attention to the timestamp shown on screen. In the alternative, a representative of Plaintiffs will be present to document (including photographs and videos) the extraction process.
- 7) The forensic expert will, at Sheehan Phinney's election, either provide the extractions to Sheehan Phinney or retain them in their entirety at Sheehan Phinney's direction until the conclusion of this litigation and appeal. If such extractions are provided to Sheehan Phinney, Sheehan Phinney will be responsible for preserving them in their entirety until the conclusion of this litigation or appeal.
- 8) The forensic expert and Sheehan Phinney will maintain (and provide as/when required) the hash information of the extractions.
- 9) Absent Court order or agreement of the parties, Plaintiffs will not access, view, hold, or otherwise control the extractions / images or their contents. However, they will remain available in their entirety if needed to comply with Ms. Read's discovery obligations or any Court Order(s).
- 10) The forensic expert may not share anything gathered, created, extracted, or mentioned here with Plaintiffs or anyone else other than Sheehan Phinney, absent an agreement of these parties or a Court Order.
- 11) Plaintiffs will pay all amounts due to the forensic expert for any work done pursuant to this Stipulation. Invoices from the agreed upon forensic expert will be sent from Sheehan Phinney to Plaintiffs for payment and Plaintiffs will be responsible for paying them promptly.
- 12) This protocol supplements the stipulated ESI Protocol as it relates to cell phones.
- 13) Before the forensic expert takes possession of the cell phones, Sheehan Phinney will advise the expert of these terms and have said expert sign same.
- 14) The discoverability of the contents of these full file system extractions will be addressed separately.

Defendant Karen Read By her attorneys	Plaintiffs By their attorneys
/s/ Aaron D. Rosenberg	/s/ Marc Diller
Damon M. Seligson (BBO#632763) Charles M. Waters (BBO#631425) Aaron D. Rosenberg (BBO#684826) Sheehan Phinney Bass & Green, PA 28 State St., 22d FL Boston, MA 02109 (617)897-5600	Marc Diller (BBO#644997) DILLER LAW, LLP 50 Congress St., Ste. 420 Boston, MA 02109 (617)523-7771

So ordered:



Hon. Mark C. Gildea
Justice of the Superior Court
Dated: *March 27, 2026*