

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.

PLAINTIFFS' MOTION TO COMPEL RESPONSES TO PLAINTIFFS'
SUPPLEMENTAL REQUESTS FOR DOCUMENT PRODUCTION

NOW COME the Plaintiffs in the above-captioned matter and hereby move this Honorable Court, pursuant to Rule 37 of the Massachusetts Rules of Civil Procedure and other relevant rules governing discovery, to issue an order compelling Defendant Karen Read to serve complete responses to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Karen Read on March 5, 2026. As of the date of service, Plaintiffs have yet to receive responses, objections, or any request for extension from Read.

The grounds for Plaintiffs' motion and the relief sought are set forth in greater detail within the accompanying Memorandum in Support thereof.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER.

Date: 5/7/26

Respectfully submitted, Plaintiffs,
By Their Attorney,
/s/ Marc Diller

Marc Diller, Esq. BBO # 644997
DILLER LAW, LLP
50 Congress St. Suite 420
Boston, MA 02100
(617) 523-7771
marc@dillerlaw.com

CERTIFICATE OF SERVICE

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

Counsel for Defendants, C&C Hospitality, LLC d/b/a C.F. McCarthy's and G&S Hospitality, LLC d/b/a C.F. McCarthy's

Tamara Smith Holtslag, Esq.
Lincoln A. Rose, Esq.
PEABODY & ARNOLD LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-951-2012
Tel: 617-951-2069
tsmith@peabodyarnold.com
lrose@peabodyarnold.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

John A. Donovan, III, Esq.
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
Tel: 617-523-6010
Fax: 617-227-0927
jdonovan@sloanewalsh.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

David F. Hassett, Esq.
John M. Dealy, Esq.
Casey L. McCaffrey, Esq.
HASSETT & DONNELLY, PC
446 Main Street, 12th Floor
Worcester, MA 01608
Tel: 508-791-6287
dhassett@hassettdonnelly.com
jdealy@hassettdonnelly.com
cmccaffrey@hassettdonnelly.com

Counsel for Defendant Karen Read

Charles Waters, Esq.
Damon M. Seligson, Esq.
Aaron D. Rosenberg, Esq.
SHEEHAN PHINNEY BASS AND GREEN PA
20 State Street, 22nd Floor
Boston, MA 02109
Tel: 617-897-5600
cwaters@sheehan.com
dseligson@sheehan.com
arosenberg@sheehan.com

Elizabeth S. Little, Esq.
Caleb E. Mason, Esq.
Alan Jackson, Esq.
WERKSMAN JACKSON & QUINN LLP
888 West Sixth Street, 4th Floor
Los Angeles, CA 90017
Tel: (213)688-0460
Elittle@werksmanjackson.com

Cmason@werksmanjackson.com
Ajackson@werksmanjackson.com

Dated: 5/7/26

/s/ *Marc Diller*
Marc Diller, Esq.

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.

PLAINTIFFS' MOTION TO COMPEL RESPONSES TO PLAINTIFFS'
SUPPLEMENTAL REQUESTS FOR DOCUMENT PRODUCTION

NOW COME the Plaintiffs in the above-captioned matter and hereby move this Honorable Court, pursuant to Rule 37 of the Massachusetts Rules of Civil Procedure and other relevant rules governing discovery, to issue an order compelling Defendant Karen Read to serve complete responses to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Karen Read on March 5, 2026. As of the date of service, Plaintiffs have yet to receive responses, objections, or any request for extension from Read.

The grounds for Plaintiffs' motion and the relief sought are set forth in greater detail within the accompanying Memorandum in Support thereof.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER.

Date: 5/7/26

Respectfully submitted, Plaintiffs,
By Their Attorney,
/s/ Marc Diller

Marc Diller, Esq. BBO # 644997
DILLER LAW, LLP
50 Congress St. Suite 420
Boston, MA 02100
(617) 523-7771
marc@dillerlaw.com

CERTIFICATE OF SERVICE

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

Counsel for Defendants, C&C Hospitality, LLC d/b/a C.F. McCarthy's and G&S Hospitality, LLC d/b/a C.F. McCarthy's

Tamara Smith Holtslag, Esq.
Lincoln A. Rose, Esq.
PEABODY & ARNOLD LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-951-2012
Tel: 617-951-2069
tsmith@peabodyarnold.com
lrose@peabodyarnold.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

John A. Donovan, III, Esq.
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
Tel: 617-523-6010
Fax: 617-227-0927
jdonovan@sloanewalsh.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

David F. Hassett, Esq.
John M. Dealy, Esq.
Casey L. McCaffrey, Esq.
HASSETT & DONNELLY, PC
446 Main Street, 12th Floor
Worcester, MA 01608
Tel: 508-791-6287
dhassett@hassettdonnelly.com
jdealy@hassettdonnelly.com
cmccaffrey@hassettdonnelly.com

Counsel for Defendant Karen Read

Charles Waters, Esq.
Damon M. Seligson, Esq.
Aaron D. Rosenberg, Esq.
SHEEHAN PHINNEY BASS AND GREEN PA
20 State Street, 22nd Floor
Boston, MA 02109
Tel: 617-897-5600
cwaters@sheehan.com
dseligson@sheehan.com
arosenberg@sheehan.com

Elizabeth S. Little, Esq.
Caleb E. Mason, Esq.
Alan Jackson, Esq.
WERKSMAN JACKSON & QUINN LLP
888 West Sixth Street, 4th Floor
Los Angeles, CA 90017
Tel: (213)688-0460
Elittle@werksmanjackson.com

Cmason@werksmanjackson.com
Ajackson@werksmanjackson.com

Dated: 5/7/26

/s/ *Marc Diller*
Marc Diller, Esq.

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.

PLAINTIFFS' MOTION TO COMPEL RESPONSES TO PLAINTIFFS'
SUPPLEMENTAL REQUESTS FOR DOCUMENT PRODUCTION

NOW COME the Plaintiffs in the above-captioned matter and hereby move this Honorable Court, pursuant to Rule 37 of the Massachusetts Rules of Civil Procedure and other relevant rules governing discovery, to issue an order compelling Defendant Karen Read to serve complete responses to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Karen Read on March 5, 2026. As of the date of service, Plaintiffs have yet to receive responses, objections, or any request for extension from Read.

The grounds for Plaintiffs' motion and the relief sought are set forth in greater detail within the accompanying Memorandum in Support thereof.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER.

Date: 5/7/26

Respectfully submitted, Plaintiffs,
 By Their Attorney,
/s/ Marc Diller

Marc Diller, Esq. BBO # 644997
DILLER LAW, LLP
50 Congress St. Suite 420
Boston, MA 02100
(617) 523-7771
marc@dillerlaw.com

CERTIFICATE OF SERVICE

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

Counsel for Defendants, C&C Hospitality, LLC d/b/a C.F. McCarthy's and G&S Hospitality, LLC d/b/a C.F. McCarthy's

Tamara Smith Holtslag, Esq.
Lincoln A. Rose, Esq.
PEABODY & ARNOLD LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-951-2012
Tel: 617-951-2069
tsmith@peabodyarnold.com
lrose@peabodyarnold.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

John A. Donovan, III, Esq.
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
Tel: 617-523-6010
Fax: 617-227-0927
jdonovan@sloanewalsh.com

Counsel for Defendant, Waterfall Bar & Grill, LTD d/b/a Waterfall Bar & Grill

David F. Hassett, Esq.
John M. Dealy, Esq.
Casey L. McCaffrey, Esq.
HASSETT & DONNELLY, PC
446 Main Street, 12th Floor
Worcester, MA 01608
Tel: 508-791-6287
dhassett@hassettdonnelly.com
jdealy@hassettdonnelly.com
cmccaffrey@hassettdonnelly.com

Counsel for Defendant Karen Read

Charles Waters, Esq.
Damon M. Seligson, Esq.
Aaron D. Rosenberg, Esq.
SHEEHAN PHINNEY BASS AND GREEN PA
20 State Street, 22nd Floor
Boston, MA 02109
Tel: 617-897-5600
cwaters@sheehan.com
dseligson@sheehan.com
arosenberg@sheehan.com

Elizabeth S. Little, Esq.
Caleb E. Mason, Esq.
Alan Jackson, Esq.
WERKSMAN JACKSON & QUINN LLP
888 West Sixth Street, 4th Floor
Los Angeles, CA 90017
Tel: (213)688-0460
Elittle@werksmanjackson.com

Cmason@werksmanjackson.com
Ajackson@werksmanjackson.com

Dated: 5/7/26

/s/ *Marc Diller*
Marc Diller, Esq.