

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,

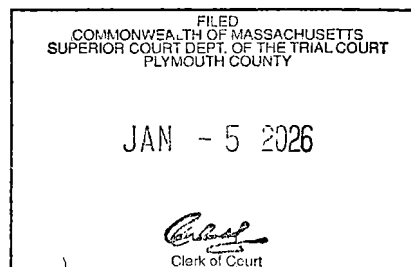
Plaintiffs,

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



**JOINT MOTION TO CONTINUE HEARING ON KAREN READ'S MOTION TO
COMPEL MICHAEL PROCTOR TO PRODUCE DOCUMENTS
PURSUANT TO SUBPOENAS**

Defendant Karen Read ("Read") and third-party Michael Proctor ("Proctor") respectfully request that the Court continue the hearing on Read's Motion to Compel Proctor to Produce Documents Pursuant to Subpoena (the "Motion"). The Court has scheduled a hearing on Read's Motion, along with other matters, on January 6, 2026. However, counsel to Read and Proctor have continued to confer since Read filed her Motion. Proctor has begun to produce documents and has represented that he has not withheld any documents responsive to Read's subpoena on any basis other than attorney-client or marital privilege. Therefore, Read and Proctor request that

the Court continue any hearing on the Motion. Once Proctor completes his production, Read will decide whether to withdraw her Motion.

WHEREFORE, Read and Proctor respectfully request that the Court continue the hearing on Read's Motion, currently scheduled for January 6, 2026.

Respectfully submitted,

KAREN READ,

By her attorneys,

/s/ Aaron D. Rosenberg

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MICHAEL PROCTOR

By his attorney

/s/ Thomas V. DiGangi

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CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on
January 5, 2026.

/s/ Aaron D. Rosenberg

Aaron D. Rosenberg