

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

**REQUEST TO CONVERT MOTION HEARING FROM
TELECONFERENCE TO IN-PERSON PROCEEDING**

Defendant Karen Read ("Read") respectfully requests that the Court convert the Motion Hearing scheduled for December 19, 2025 from a Zoom proceeding to an in-person hearing. By the time of that hearing, the Court will have at least three separate Motions to Compel before it, involving numerous parties and nonparties, all of whom are represented by separate counsel. Some of those Motions are interrelated and will likely involve considerable back and forth amongst various attorneys and the Court. Under the circumstances, an in-person hearing will be significantly more helpful to the Court in rendering its decisions on the pending motions.

At the last Status Conference, Plaintiffs' counsel indicated that he could only attend a hearing on December 19th if it was held remotely. Therefore, if necessary, Read is willing to

have the Court reschedule the upcoming Motion Hearing to another date for purposes of converting it to an in-person proceeding.

Prior to filing this Request, Read contacted counsel to all parties on December 12th to ask if they assented and for their availability in the event the hearing needed to be rescheduled. Defendants Waterfall Bar & Grill Ltd. d/b/a Waterfall Bar & Grill (“Waterfall”) and C&C Hospitality, LLC d/b/a C.F. McCarthy’s (“CFM”) indicated they do not oppose this request. If the Court ultimately re-schedules the Motion Hearing currently scheduled for December 19th, Read, Waterfall, and CFM are available for an in-person hearing on the following dates: January 6th, January 7th, and January 9th.

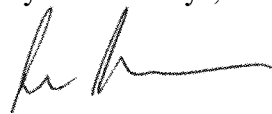
Plaintiffs have not responded to Read’s December 12th request for assent and availability.

WHEREFORE, Read respectfully requests that the Court convert the Motion Hearing set for December 19, 2025 into an in-person hearing.

Respectfully submitted,

KAREN READ,

By her attorneys,



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Dated: December 15, 2025

CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on
December 15, 2025.

A handwritten signature in black ink, appearing to read 'A. Rosenberg', is written above a horizontal line.

Aaron D. Rosenberg