

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.

**PLAINTIFF'S MOTION TO COMPEL FURTHER ANSWERS TO
INTERROGATORIES FROM DEFENDANT KAREN READ**

NOW COMES the Plaintiff Paul O'Keefe, as Personal Representative of the Estate of John Joseph O'Keefe, III, and hereby moves this Honorable Court to compel Defendant Karen Read to serve a responsive and complete answer to Plaintiff's Interrogatory No. 1 (Memorandum EX. 1) seeking the factual basis for Defendant Read's third-party culprit defense in compliance with the rules of discovery including Superior Court Rule 30A.

Defendant Read's affirmative defense—that unidentified third parties are responsible for John O'Keefe's death—demands more than mere assertion; it requires factual support and full transparency. A defendant who affirmatively claims to be absolved of liability by pointing to others must substantiate that claim with specific evidence, not vague speculation. Plaintiffs have a right to know the specific identity of these alleged third parties and the factual basis for such a defense, as mandated by Superior Court Rule 30A and the principles of fair discovery. Yet, despite years of public statements and rhetoric claiming to "know who did it" and the burden of proving her

allegations at this civil trial, Ms. Read refuses to provide Plaintiffs with any factual basis supporting such defense, instead offering improper objections and evasive, unsupported accusations. The Court should not permit Ms. Read to shield critical information while simultaneously leveraging it in public and in pleadings. Justice and the integrity of the discovery process require that Ms. Read either disclose the identities and facts supporting her defense or clearly admit she cannot do so. Anything less undermines the fairness owed to all litigants.

The grounds for Plaintiff's motion are set forth in greater detail within the accompanying Memorandum in Support thereof.

THE PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER.

Date: 12.2.25

Respectfully submitted, Plaintiffs,
By Their Attorney,

/s/ Marc Diller
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CERTIFICATE OF SERVICE

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

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DATED: 12.2.25

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