

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

**DEFENDANT KAREN READ'S MOTION TO COMPEL THE TOWN OF CANTON TO
PRODUCE DOCUMENTS PURSUANT TO NON-PARTY SUBPOENA**

Defendant Karen Read ("Read") respectfully requests that the Court compel the Town of Canton (the "Town") to produce all documents that are responsive to the subpoena that Read served on it over a month ago, a copy of which is attached to the accompanying Memorandum of Law. That subpoena seeks documents relating to the Canton Police Department's ("CPD") investigation into Sgt. Sean Goode's ("Goode") alleged misconduct, which led to him being placed on administrative leave in late 2025. Read's counsel has been conferring with the Town's counsel in good faith for months about these documents. Initially, the Town's counsel expressly represented that the Town did not possess documents that are responsive to Read's subpoena. But now, months later, the Town acknowledges that it does in fact have documents, but objects to

producing them. However, the Town has not asserted any objection that justifies withholding the requested materials, and its conduct further delays the parties' ability to move this litigation forward. The documents that Read seeks are well within the scope of Rule 26, and the Court should order the Town to comply with Read's subpoena.

WHEREFORE, Read respectfully requests that the Court allow this Motion and order the Town to produce all documents responsive to Read's February 10, 2026 subpoena within ten (10) days of such order.

Respectfully submitted,

/s/ Aaron D. Rosenberg

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Dated: March 23, 2026

CERTIFICATE OF SERVICE

I certify that I served a copy of this document on all counsel of record by email on March 23, 2026.

/s/ Aaron D. Rosenberg

Aaron D. Rosenberg