

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' EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
PURSUANT TO RULE 65 TO PREVENT RELEASE OF EVIDENCE¹**

*"I'm dead. I'm f*****g dead. Do you have any clue what's on the phone that they took?"*

NOW COME the Plaintiffs and respectfully request this Court issue an Order restraining Defendant Karen Read from taking possession of cellular phone(s) in the custody of the Norfolk District Attorney's Office (NDAO) before Plaintiffs have had an opportunity to digitally image the phones so a full record of the phones is maintained and communications and data reasonably calculated to lead to discovery of admissible evidence are preserved. Plaintiffs request a temporary restraining order to maintain the status quo pending a formal hearing on the matter. As grounds therefore, Plaintiffs respectfully state as follows:

I. RELEVANT BACKGROUND

¹ Because some Exhibits are in video format, all referenced Exhibits can be found here:
<https://lawampm.sharepoint.com/:f/s/External/IgBaxbIXxESqRK0VgMREC5y7AQ78Gq4Xewv-lijUYrie5iA?e=N7735z> (copy link and paste in browser)

While Karen Read was charged criminally in connection with the January 2022 death of Boston police officer John O'Keefe, investigators seized a cell phone belonging to Read as part of the murder investigation. At some point thereafter, police seized other cellular phones belonging to Read in connection with prosecuting blogger Aidan Kearney (known as "Turtleboy") for witness and juror intimidation in Read's criminal case. The devices remained in government custody throughout Read's 2024 trial and 2025 retrial. In late 2025, the NDAO, in connection with the Kearney investigation, sought authorization to search Read's phones for relevant evidence. In February 2026, a Norfolk Superior Court judge denied NDAO's request to search the phones with its decision under seal.² On Thursday, February 19, 2026, Read sought an immediate return of her cellular phones. In order to prevent the immediate and irreparable loss of evidence critical to Plaintiffs' civil claims, we file the instant motion.

II. LEGAL STANDARD

"A temporary restraining order may be granted without written or oral notice to the adverse party or his attorney only if it clearly appears from specific facts shown by affidavit or by the verified complaint that immediate and irreparable injury, loss, or damage will result to the applicant before the adverse party or his attorney can be heard in opposition." Mass. R. Civ. P. 65(a).

"The temporary restraining order serves principally to maintain the status quo pending a hearing." *Nogeiro v. Comm'r Of the Dept. of Transitional Assistance*, 72 Mass. App. Ct. 496, 500 (2008) citing *Smith & Zobel*, Rules Practice § 65.2 (1981).

"The destruction of relevant evidence has a pernicious effect on the truth-finding function of our courts." *Scott v. Garfield*, 454 Mass. 790, 798 (2009). Preventing spoliation and preserving evidence necessary to adjudicate claims are within the court's "inherent powers that are essential

² Norfolk Superior Court, Criminal Docket No. 2482SW0004

to the function of the judicial department, to the maintenance of its authority, or to its capacity to decide cases.” *Com. v. Fremont Inv. & Loan*, 459 Mass. 209, 213 (2011).

III. ARGUMENT

In order to ensure the preservation of admittedly critical evidence and to prevent irreparable harm to Plaintiffs’ ability to fully and fairly prepare their case, Plaintiffs seek an emergency order of this Court temporarily restraining Defendant Read from taking possession of her cell phones from the NDAO to allow the Plaintiffs an opportunity to be heard regarding the need to forensically image the contents of Read’s phones before such devices are returned to Read. The contents of Read’s cell phones are materially relevant to Plaintiffs’ infliction of emotional distress allegations. This Court has already endorsed a plausible claim against Read for pushing a false narrative through the media, notably Aidan Kearney, and for pitting the Reads against the O’Keefe family.³

It is not disputed that Read was feeding information to Kearney to shape the public narrative. In an interview with HBO, Read stated:

“Nathan only started talking to Turtleboy after Turtleboy got involved. John was always a fan, and John like **one of my conduits early on**. The lawyers told me that we could share anything with him [Kearney] as long as it was public, and not for me to do it directly – to **go through a third party**. That was the protocol for a little while, and then I started to get nervous about who I was using for a third party because I started to trust Turtleboy to an extent, but **the information I’m giving him is valuable**, and I need to trust the middle-man. I didn’t want to have any of my close friends to do it because I didn’t want to put them in that spot, so I **eventually just started sending things to him directly**. But I would tell him, I’d give him some back story.”

“Relaying it through someone whose had a few glasses of wine to have it relayed to Turtleboy, I thought, I’ve only got so much patience here. **I’ve just got**

³ On or about October 3, 2025, Judge O’Shea denied Read’s motion to dismiss Plaintiffs’ claims for reckless and/or intentional infliction of emotional distress relying, in part, on the contents of an affidavit of State Trooper Brian Tully seeking an application for a search warrant to seize Read’s mobile devices. This Court noted that “Kearney [Turtleboy] unquestionably took extensive efforts in publicizing information regarding the charges against Read, and the affidavit describes Read acting in concert with some of those efforts. Notably, Kearney stated that the time had ‘expired’ for ‘going after’ the O’Keefe family and that the O’Keefe family involved in a coverup regarding JJ’s death.” See Docket Paper No. 42 at pp. 10-11

to talk to this kid directly. And then we started talking about the case probably once a day almost every day five-to-six days per week."

"It was a little *quid pro quo*. He was getting tips that were better than a lot of the tips that we were getting, and I was helping him getting up to speed on what he had missed from the previous year, year-and-a-half."

"I don't have any shame. I haven't denied it. I'll tell anybody how often. **It's in the phone records. I talked to him almost every day.** This case has been massive for him, and it's my entire life. So yeah, we talk about Jen McCabe and Michael Proctor and **what's in the latest discovery** and, you know, 'what do you guys think you're going to do next?' We had all these conversations."

[Exhibit A]

When Kearney was investigated criminally, police seized Read's phones. These phones are the subject of this motion.

Plaintiffs have a good faith basis to believe that the data contained in those phones (emails, texts, internet usage, application usage, etc.) will confirm that Read was communicating her narrative either directly or through intermediaries to Kearney. Kearney's publications and videos have mirrored the Read team's narrative and have publicly attacked the O'Keefe family with information transmitted to him by Read. Unlike the NDAO, Plaintiffs need only show their request for these communications is reasonably calculated to lead to the discovery of admissible evidence, a markedly lower standard.

That burden is met here. For example, these exchanges from April 2023 are just a snapshot into how Karen Read was helping direct this public narrative through Kearney.

On April 23, 2023, at 11:03 AM, Kearney notified Read, through an intermediary (Natalie Wiweke) that he was writing a blog about Sarah Levinson, a Commonwealth witness. [Exhibit B] Through the intermediary, Read responded, **"Tell him Proctor – likely intentionally – spelled her [Levinson] and Julie Nagel's names wrong. ... Her name is 'Sarah' not 'Sara.'"** [Exhibit B] Kearney asked, "Why spell the names wrong?" to which Read (through intermediary) responded **"to hide their identities from us. Make them tough for the defense or public to track."** [Exhibit

B] Kearney responded, "It's up." [Exhibit B] The next day, on April 24, Kearney posted a blog titled "Canton Cover-Up Part 9: Woman In House Where John O'Keefe Was Murdered Is Beth Israel Milton Nurse Sarah Levinson, **Name Was Intentionally Misspelled by Trooper Proctor** On Police Report." [Exhibit C]

Also, on April 29, 2023, Read (through intermediary Wiweke) texted Kearney:

"Patrick [Furbush] is wearing a jersey with his uncle's murderers on it. ... Kerry Roberts is a f*****g c**t. Always has been. ... Tell TB: great job with the geofence. ... **Please, if you agree, post something to the 'supporters of the Furbush children:** These 'supporters' can no longer pretend to care what happens to those kids. ... Text me from signal. ... Check you signal. ... Check your signal. ... Check ur signal."

[Exhibit D] The next day, on April 30, 2023, Kearney posted a blog ("Canton Cover-Up Part 16") writing, "Let's be clear – **you cannot claim to 'support' the Furbush children** (John's niece and nephew), as people like Kerry Roberts do, if you are actively covering for their [*sic*] killers. Kerry Roberts is not interested in protecting or shielding this young boy. She is exploiting him on social media for likes as he parades around in an Albert family shirt." [Exhibit E]

Additionally, Plaintiffs have good reason to believe the contents of Read's phones may undermine Read's third-party culprit affirmative defense and related under-oath statements made in answering Plaintiff's Interrogatories. For example, Read stated in response to Interrogatory No. 2, "I do not know which specific individual or individuals within the house fatally wounded Mr. O'Keefe." See Docket Paper No. 73.3 at pp. 9. However, on May 6, 2023, Read (through intermediary) texted, "tell him the body was moved. ... tell him I can't be more specific because this is a key witness that no one knows about. ... It's a not a party goer. Not anyone who was at the party." [Exhibit F] Later, she texted, "Aidan – I'm telling you **we know for sure when and by whom the body was planted.**" [Exhibit F] This purported knowledge was omitted from Read's

under-oath response, even though the Interrogatory called for "all facts" forming Read's third-party affirmative defense.

In July of 2025, Plaintiffs propounded discovery and preservation orders upon Read and a subpoena upon NDAO requesting the extractions from these phones. None have been provided to date, and no privilege log was provided. Counsel for Defendant Read confirmed that no information from Read's cell phone(s) was included in the 900,000+ page document dump provided on November 20, 2025, and December 2, 2025. [Exhibit G]

Should the cell phones be returned to Read and their contents altered, Plaintiffs will suffer irreparable prejudice in prosecuting their emotional distress claims. Conversely, Read's claim that she needs the phone(s) returned urgently stands in contradiction to her speaking to the press from the courthouse steps using a different personal cell phone just this past Thursday, February 19. [Exhibit H]

Plaintiffs further have a good faith basis to believe Read may alter or destroy the cell phone(s) contents should they be returned to her before Plaintiffs can preserve all data contained on the device(s). When police first seized one of the devices on January 24, 2024, Read factory reset the device, wiping all data and information from it. [Exhibit I] Recently, audio from a phone call between Kearney and Read was leaked, during which Read stated, **"I'm dead. I'm f*****g dead. Do you have any clue what's on the phone that they took?"** [Exhibit J] Read's own admission supports Plaintiffs' belief that the subject cell phone(s) contains discoverable information materially relevant to Plaintiffs' claims and harmful to Read.

Read sought relief through the criminal court without notifying Plaintiffs' counsel even though the cell phones are integral components of this case; Plaintiffs only received notice via social media. The timing of Read's February 19th motion also raises suspicion considering this

Court on February 12 ordered the parties to convene about a plan for exchanging electronically stored information and to file the same by March 3. Once the cell phones leave secure evidence holding, even innocent use of the devices will overwrite crucial information and metadata contained intra.

Plaintiffs therefore seek a temporary restraining order preventing Read from taking possession of her cell phones until Plaintiffs have the benefit of forensically preserving and imaging those devices. Plaintiffs are willing to engage a court-approved third party, i.e. a taint-team comprised of a judge and forensic examiner agreed to by the defense, to review and log any potentially privileged attorney communications.

Judge Doolin directed Plaintiffs to file their opposition to Read's motion for return of property in the criminal case on Monday February 23, 2026. Plaintiffs seek this Court's intervention in tandem with such opposition.

WHEREFORE, Plaintiffs respectfully request this Court issue a temporary Order restraining Defendant Karen Read from taking possession of cellular phone(s) in the custody of the Norfolk District Attorney's Office (NDAO) pending a formal hearing on Plaintiffs' request for a neutral third-party to forensically preserve all communications and data contained on those devices.

PLAINTIFFS RESPECTFULLY REQUEST A HEARING ON THIS MATTER

Respectfully submitted,
The Plaintiffs,
By and through counsel:

/s/ Marc Diller
Marc Diller, Esq.
BBO # 644997
Diller Law, LLP
50 Congress Street, Suite 420
Boston, MA 02109

MDiller@DillerLaw.com

EXHIBIT A

https://lawampm.sharepoint.com/:f/s/External/IgD5TdS_AN03RYVtzXICz0igAXwgcCDPyE6ZEz6R-phenlo?e=9DBsoE (copy link and paste in browser)

EXHIBIT B



Turtleboy



Apr 24, 2023 at 11:03 AM



Doing a quick blurb
about Sarah levinson

Did Jen McCabe drive
her home?

**Let me check my notes.
I'm at my laptop.**

It was

I got it

**Tell him Proctor - likely
intentionally - spelled**



Turtleboy

**Tell him Proctor - likely
intentionally - spelled
her and Julie Nagel's
names wrong**

Jen did drive her home

**13__Copy-
__of_MSP_Re-
port_Case_#2
022-112-033,
Interview...**

PDF Document

3.4 MB

**Her name is "Sarah"
not "Sara".**

**Nagel and Levinson are
also both MIA on social
media as of today**

File a document



4/2/2026 10:10





Tortleboy



pdf

13_Copy_of_MSP_Report_Case_#2072-112-033_Interview_of_Sara_Levinson_Sp...

2/23/2026 5:12 PM

!!

Her name is "Gorah" not "Sara"

Naget and Levinson are also both LMA on social media as of today

Has she testified in front of grand jury

Naget

Why spell the names wrong?

In case people Google?

To hide their identities from us. Make them tough for the defense or the public to track..

2/23/2026

It's up

They're protecting everyone in that house including her.

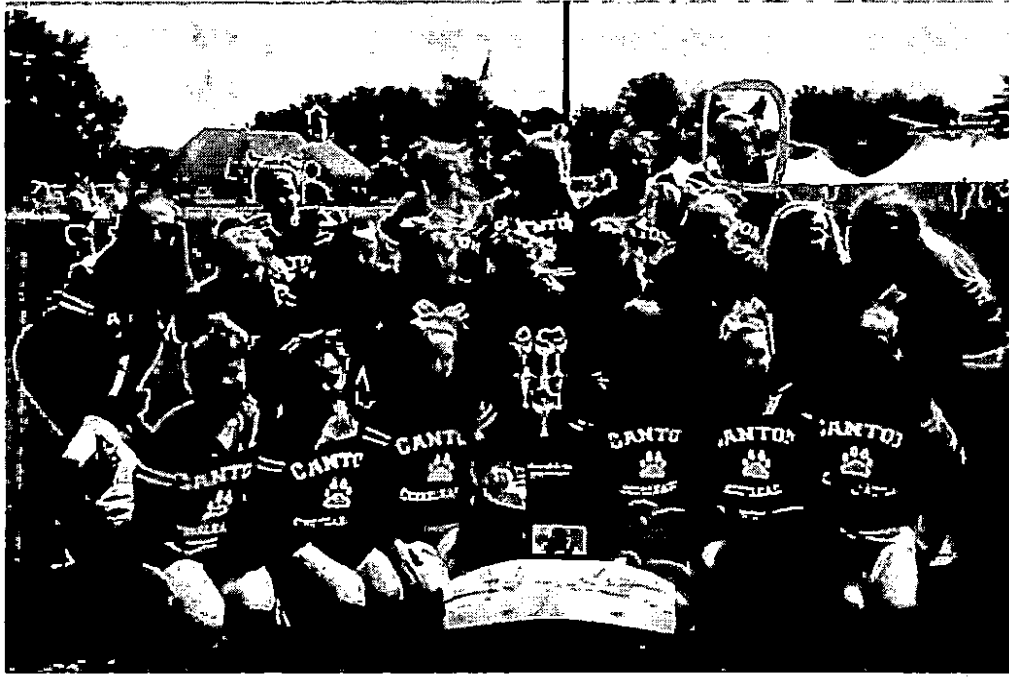
A healthcare worker letting a man die in front of her and then lying to police to cover for his killers

Her friends father



EXHIBIT C

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(Front row l-r) Nikkie Wong, Madison Randolph, captain Kristen Fabbiano, captain Tristan Bigot, Jessie Ryan, Hannah Dickie;
(second row l-r) assistant coach Kelsey Cummings, Meghan Peters, Emily Fabbiano, Bridget Monagle, Victoria Galanis,
Katherine Pineo, Molly Wigandt, head coach Valerie Baker, assistant coach Kristina Baker; (third row l-r) Liz Smith, Brittney
Hurley, Maddie McDonough, Kiyana Aldin, and Sarah Levinson

Jennifer McCabe was in charge of getting the young people out of the house who didn't have rides, including Nagel and Levinson, who were dropped off at their homes by McCabe around 2 AM.

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11. According to Ms. McCabe's initial interview with Trooper Proctor on January 29, 2022, at 11:30 a.m.—when the events were still fresh in her mind—Ms. McCabe claimed that she left the Albert Residence with her husband “at approximately 1:30 a.m. and went home.”³ (Affidavit of Alan J. Jackson at ¶6, Exhibit C, at p. 2.) However, as set forth in Richard Green's Affidavit, a forensic analysis of her cell phone shows that Jennifer McCabe actually left the Albert residence at 1:47 a.m. (Affidavit of Richard Green at ¶16.) Moreover, she didn't drive directly home with her husband, as she initially claimed. Instead, the McCabes made the executive decision at 2:00 a.m.—*in a snowstorm*—to drop off two of Brian Albert, Jr.'s friends who were in attendance at the party, Julie Nagel and Sarah Levinson, passing O'Keefe's residence at One Meadows Avenue on their way home. (Affidavit of Richard Green at ¶16.) The McCabes clearly wanted to know whether Ms. Read would be home to *notice* if and when O'Keefe failed to return home that morning or if that privilege would be left to his two adopted children.

12. After passing by the deceased's home at One Meadows Ave, location data obtained from Jennifer McCabe's cell phone shows she arrived back at her own home, 12 Country Lane, at 2:12 a.m. (*Ibid.*) Approximately ten minutes later, at 2:23 a.m., Apple Health recorded Ms. McCabe climb one flight of stairs, presumably to go upstairs to her bedroom. (Affidavit of Richard Green at ¶17, Exhibit USF-08, at p. 10.) When questioned by law enforcement as to *why* O'Keefe never made it into the party, Ms. McCabe told law enforcement “[s]he did not think anything of it and thought that [Ms. Read and O'Keefe] just decided not to come in.” (Affidavit of Alan J. Jackson at ¶8, Exhibit E, at p. 2.) However, at 2:27 a.m. that morning, after making it safely home and climbing the stairs to the privacy of her bedroom, the first and only information Ms. McCabe desperately needed to Google was “hos[sic] long to die in the cold.” (See Affidavit of Richard Green at ¶6.) *How long to die in the cold.* Jennifer McCabe didn't sleep that night.

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What's not yet been pointed out is
College graduate is a nurse at Beth



LinkedIn



Sarah Levinson BSN, RN -
Registered Nurse - Beth...

Visit

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Licensee Information

[Close Window](#)

Name

Full Name: Sarah Marie Levinson

License Information

License Number:	RN2353682	License Type:	Registered Nurse
Profession:	NURSING	Date of Last Renewal:	4/5/2022
Issue Date:	7/9/2021	Expiration Date:	6/19/2024
License Status:	Current	Today's Date:	4/23/2023
Reciprocity State:			

Address Information

City: Canton
State: MA
Zipcode: 02021
Country: United States

Education Information

School Name: Regis College
Degree Certificate: Bachelor of Science in Nursing

Prerequisite Information

No Prerequisite Information

Disciplinary Information

Important: Disciplinary actions taken against a license will NOT display on any other license or associated permit or authorization. You must look up every license, permit, or authorization held by a licensee to see all disciplinary actions.

Case #	Date Closed	Discipline	Discipline Start	Discipline End
Currently there is no disciplinary information regarding this license.				

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How could Sarah Levinson not have known that a Boston Police Officer died inside the house she was in? How could she not have heard the struggle or him being thrown down the basement stairs at 12:24 AM, which was proven in the phone logs? How could she not have seen his body lying in the snow when she got into Jennifer McCabe's car? What did Brian Albert, or someone else in that house say to her, in order to get her to remain quiet about this for over a year? Why has she allowed a completely innocent woman to be charged with John O'Keefe's murder when she likely knows exactly who killed him?

**ADS & POPUPS
DRIVING YOU MAD?**



**GET AD-FREE
FROM \$10 A MONTH**

The Massachusetts standards of conduct for nurses dictates that no nurse "shall not aid any person in performing an act prohibited by law."

(6) Compliance with Laws and Regulations Related to Nursing.

(a) A nurse who holds a valid license shall comply with M.G.L. c. 112, §§ 74 through 81C, as well as with any other laws and regulations related to licensure and practice. Examples of such laws include, but are not limited to, the following:

1. M.G.L. c. 19A, § 15 (obligation to report elder abuse);
2. M.G.L. c. 19C, § 10 (obligation to report abuse of disabled person);
3. M.G.L. c. 38, § 3 (report of death to medical examiner);
4. M.G.L. c. 46, § 9 (death pronouncement);
5. M.G.L. c. 62C, § 47A(d) (obligation to pay state taxes);
6. M.G.L. c. 71, § 55A (obligation to sick school child);
7. M.G.L. c. 71, § 55B (obligation to file report certifying freedom from tuberculosis in communicable form);
8. M.G.L. 94C (Controlled Substances Act - requirements for possessing, dispensing, administering, and prescribing controlled substances);
9. M.G.L. c. 111, § 70E (Patients' or Residents' Rights);
10. M.G.L. c. 111, § 70F (HTLV-III Tests);
11. M.G.L. c. 111, § 72G (obligation to report abuse of patient or resident);
12. M.G.L. c. 111, § 110 (obligation to report infant with swollen, red, or inflamed eye(s) or with unnatural discharge within two weeks after birth);
13. M.G.L. c. 111, § 110B (obligation to report examination or treatment of child with Reyes syndrome);
14. M.G.L. c. 111, § 191 (obligation to report lead poisoning);
15. M.G.L. c. 112, § 12CC (obligation to report Sentimental Value Cast Are Thankful for Subtitles);
16. M.G.L. c. 112, § 61 (obligation to report child abuse);
17. M.G.L. c. 119, § 51A (obligation to report child abuse);
18. M.G.L. c. 119A, § 16 (obligation to report child abuse);
19. M.G.L. c. 123, § 12 (requirement to report child abuse);
20. M.G.L. c. 123, § 21 (requirement to report child abuse);
21. M.G.L. c. 123B, § 8 (requirement to report child abuse).

(b) A nurse licensed by the Board will comply with 244 CMR 9.03(6)(a)5., 16., and 18., as contained in M.G.L. c. 112, § 74 (RN's Code of Ethics).

(7) Aiding Unlawful Activity. A nurse shall not aid any person in performing any act prohibited by law or regulation.

Sarah Levinson was in the house when John O'Keefe was killed. She knows what really happened and is actively aiding his murderers. Has she been questioned by the grand jury? We don't know because GJ testimony is sealed. But since no one in that house has been charged with killing O'Keefe it can be inferred that she either has not testified, or lied under oath if she did.

It's noteworthy that in Trooper Michael Proctor's report he intentionally spells Sarah and Julie Nagel's names wrong every time he mentioned them.



CHARLES D. BAKER
GOVERNOR
KARYN E. POLITO
LIEUTENANT GOVERNOR
TERENCE M. RIOS
DEPUTY SECRETARY

The Commonwealth of Massachusetts
Department of State Police

Division of Investigative Services
Norfolk State Police Detective Unit

45 Shawmut Road
Canton, MA 02021

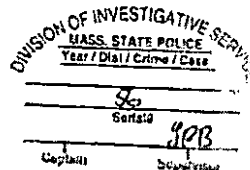


CHRISTOPHER S. MASON
COLONEL, SUPERINTENDENT
R. SCOTT WARMINGTON
DEPUTY SUPERINTENDENT

November 3, 2022

To: Detective Lieutenant Brian P. Tully #3520
From: Trooper Michael Proctor #3863
Subject: Interview of Sara Levinson (DOB: 06/19/1998) at 45 Shawmut Road, Canton MA.
Re: John O'Keefe Motor Vehicle Homicide.
Case: 2022-112-033

1. On January 29, 2022 at approximately 6:04AM, the Canton Police Department received a 911 call for a male party. John O'Keefe discovered unresponsive outside of 34 Fairview Road. Canton Police, Fire and EMS responded to the scene. Canton Fire and EMS were dispatched to 34 Fairview Road for an unresponsive male discovered outside in the snow and CPR was in progress. Canton EMS transported the victim to Good Samaritan Hospital where he was determined to be deceased. Inside the residence that evening was Sara Levinson who was visiting her friend Brian Albert Jr for his birthday. On October 21, 2022 at 12:20am, Sara arrived at the Norfolk County District Attorney's office for a scheduled interview with Trooper Connor Keefe and myself.



Page 1 of 3

2. Sara has known Brian Jr for approximately eight years and was at his house on Friday, January 28, 2022 for his birthday. Sara stated Mary Kent, Emily Fabiano, ordered pizza. Mary, Emily, Courtney. Sara stated Brian Sr arrived home from [redacted] were returning from a New York Police. Sara stated Brian Sr, Nicole and his friend [redacted] one. Sara stated when Brian Sr, Nicole, Matthew and Jennifer McCabe and Bri

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3. Sara stated everyone was no one else entered the residence and then to her brother, Ryan Nagle. Julie called to invite him in, which he declined and I charged her cellphone on the kitchen island. Sara didn't say who. The friend that Jennifer

thought that individual went home due to the press etc.

This would ensure that if people ever searched for her name and spelt it correctly this document would not come up. Proctor was protecting them, just as he was the people who killed John O'Keefe.

Sarah Levinson's LinkedIn was up prior to our blog being published a week ago, but has since been pulled down.



LinkedIn

<https://www.linkedin.com/sarahlevinsonbsnrn>

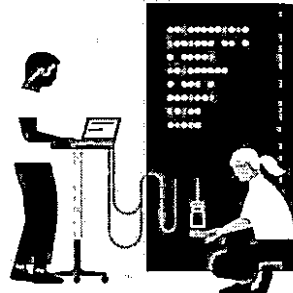
Sarah Levinson BSN, RN - Beth Israel Deaconess Hospital

Greater Boston · Registered Nurse · Beth Israel Deaconess Hospital - Milton

Outgoing and compassionate Registered Nurse delivering quality care to medical and surgical acute care patients at Beth Israel Deaconess - Milton.

→ <https://www.linkedin.com/404/>

LinkedIn



This page doesn't exist

Please check your URL or return to LinkedIn home.

[Go to your feed](#)

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Usually if your LinkedIn comes up c
down less than 2 weeks ago. Just lil
Levinson is on a deleting spree in o
murder of John O'Keefe. These are
Levinson doesn't come forward and
is just as guilty as O'Keefe's killers. I

they no longer have to be. Thanks to our blogs he cannot hurt or threaten you anymore.

Sarah Levinson, or a family member or representative for her, is invited to contact me directly at turtleboysports@gmail.com for comment. Until she comes clean she has no business being a nurse at Beth Israel Milton. It is the moral and ethical duty of healthcare workers to preserve life. John O'Keefe was alive when they dumped him out in the snow at 12:32 AM. Sarah Levinson could have saved his life but chose not to. Any patient under her care is unsafe until her involvement in this matter is thoroughly investigated.

Do Not Sell or Share My Personal Information

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EXHIBIT D

7:45

4/29/23

Turtleboy

Patrick is in blue

Yes in blue

Patrick is in blue

If he calls the realtor, have him ask why private showings only and no one was allowed to take photos?

John O'Keefe

Add Friend

Message

Went to Braintree High School

Studied Criminal Justice at Northeastern University

Joined November 2008

Saturday - Apr 29, 2023 - 1:06 PM

Screenshot

7:45

Turtleboy

Tell TB: great job with the gofence. I am so happy other people can finally see how long we've been fighting this case. Donny DiRico said to pass his # to Aidan if he wants to coordinate with Team Read on Wed.

Apr 30, 2023 at 8:26 AM

Please, if you agree, post something to the "supporters" of the Furbush children: These "supporters" can no longer pretend to care what happens to those kids. They do not

7:45

Turtleboy

Please, if you agree, post something to the "supporters" of the Furbush children: These "supporters" can no longer pretend to care what happens to those kids. They do not want to protect or shield them. Whether you believe Karen Read or Brian Albert killed John, posting a 12yo boy at Little League and showcasing jerseys with the parade route for his uncle's death is a new low for Canton. The kids should not be posted by anyone - not Kerry the Cunt and not the

7:45

Turtleboy

Old babysitters. That's not protecting them!! That's using them for cover and for attention, because these women have such pathetic lives.

Apr 30, 2023 at 1:50 PM

Can you get on signal please.

I am

Text me from signal

Check you signal

Check your signal

Check ur signal

EXHIBIT E

TB Investigates

Canton Cover-Up Part 16: Kerry, Roberts Posts Facebook Pictures Showing John O'Keefe's Nephew Advertising Albert Pizza Shop And Bar Where He Met His Murderers

🕒 Aidan Kearney • April 30, 2023



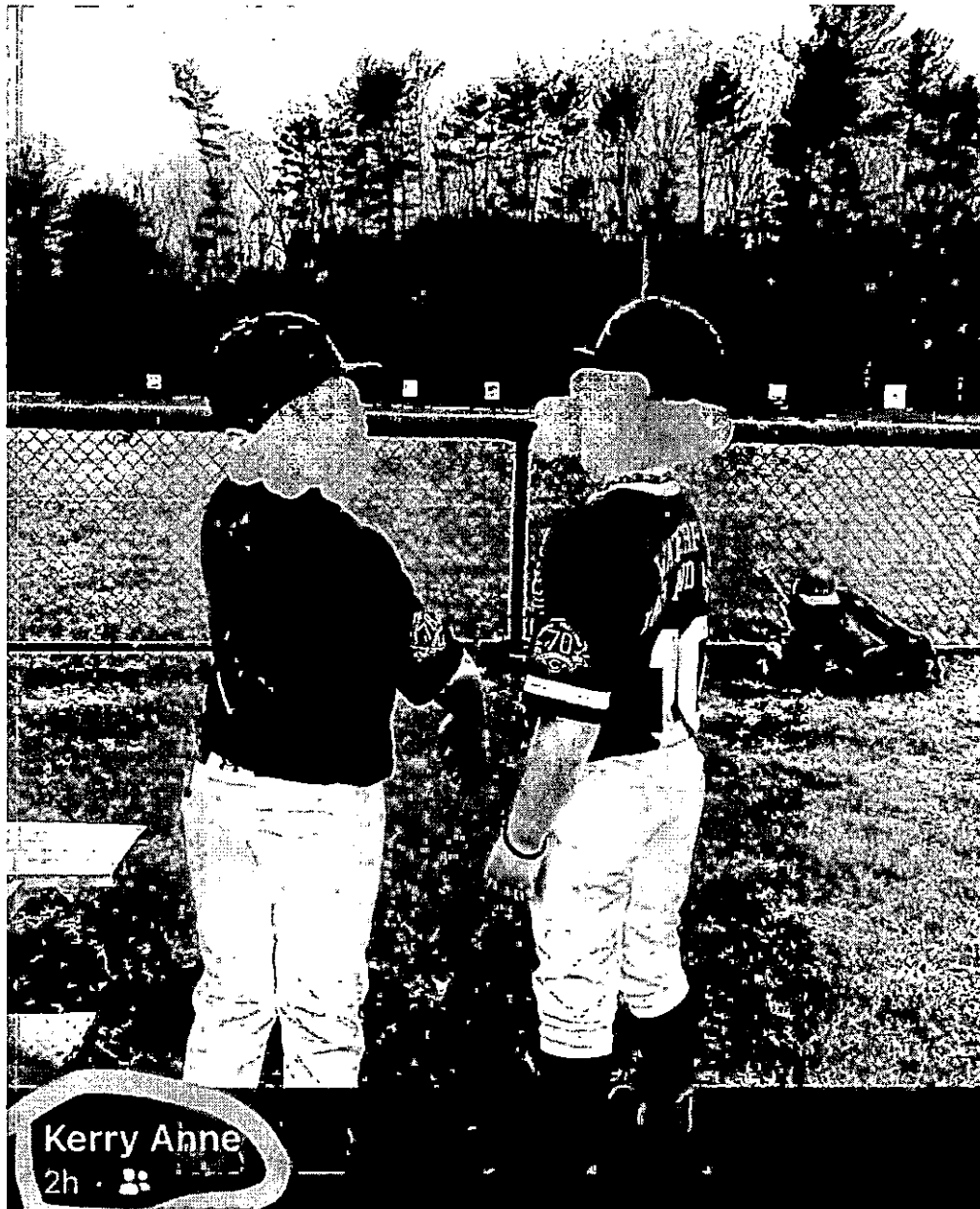
- See all parts of the Canton Cover-Up Series
- Watch the Live Shows and videos

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In one of the most disgusting displays of disrespect, Roberts, who was with Karen Read at the time of the murdered body of her boyfriend John O'Keefe, on Saturday of O'Keefe's orphans, his uncle's killer's family.



Sentimental Value Cast Are Thankful for Subtitles

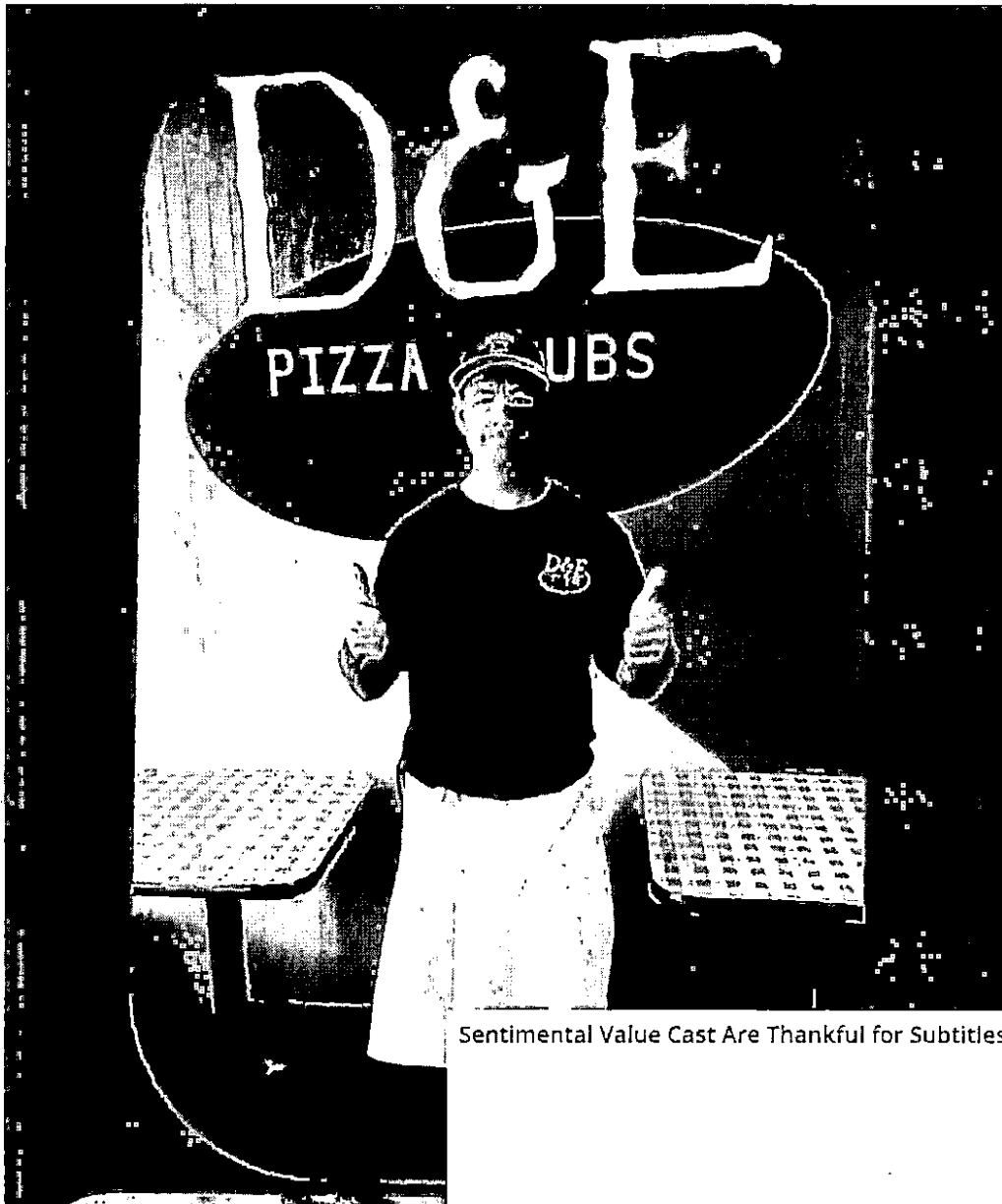


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Sentimental Value Cast Are Thankful for Subtitles

The boy on the left is the John O'Ke
owned by Chris Albert, the brother
Albert, both of whom were inside th
murdered.



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Chris Albert previously attempted t
about his son's alleged involvemen
other person with power in this cor
what happened to his beloved uncl

a baseball team sponsored by the people who are actively covering for his uncle's murderers, which he likely has no idea about unless he subscribes to Turtleboy Daily News. The boy next to him is wearing a Waterfall Bar and Grill shirt – where John O'Keefe enjoyed the last drink of his life before being murdered at 34 Fairview Road.

There is no way that Kerry Roberts was not aware of this when she posted it. She knew EXACTLY what she was doing. I know Kerry will be reading this, so I just want to remind her that her privacy settings on Facebook are strong, and the people you think are your friends are so disgusted by this that they sent it to me.



Kerry McDermott Roberts

Jan 28 • 🌐

👍❤️👍 125

8 comments

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ADS & POPUPS DRIVING YOU MAD?

Let's be clear – you cannot claim to (niece and nephew), as people like k for their killers. Kerry Roberts is not young boy. She is exploiting him or around in an Albert family shirt.

John O'Keefe. went into 34 Fairview Road alive.

That is a fact.

He left the house unconscious or dead.

That is a fact.

Someone in that house did something to him that caused him to die.

That is a fact.

Every person in that house who remains silent is complicit in his murder because they are covering for his murderers.

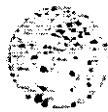
That is a fact.

Every person who took steps to protect Colin Albert, including his own father, is complicit in the murder of John O'Keefe.

I can't get over the arrogance of Kerry Roberts posting that picture on Facebook.

I can't get over Jennifer McCabe and her Stoughton High School guidance counselor friend Meg Kennedy (who was reportedly Sandra Birchmore's guidance counselor and somehow missed the red flags that she was being groomed by sexual deviant Stoughton Police Officers), posted pictures of themselves with a bunch of high school kids getting ready for the prom this weekend.

Sentimental Value Cast Are Thankful for Subtitles

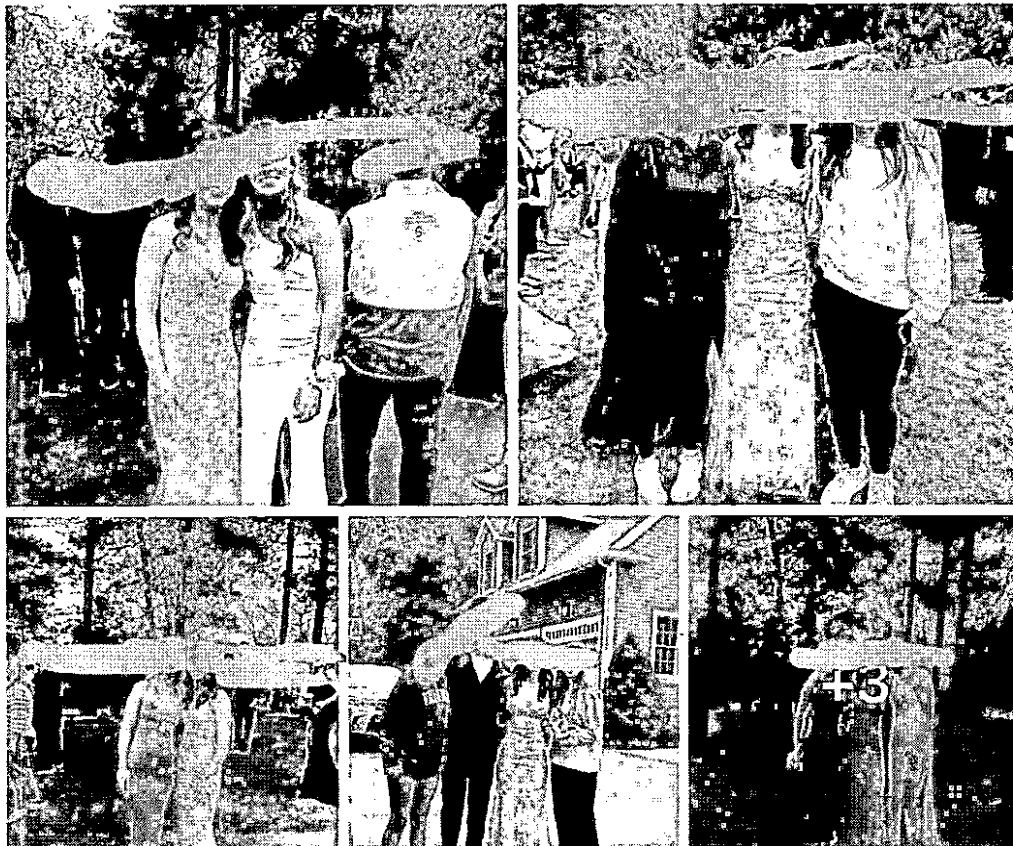


Meg Kennedy is with Jennifer Weeks McCabe and 2 others.

...



13m • 👥



I can't get over the fact that Chris Albert is so brazen that he showed up at Little League opening day with the police chief, and paraded around like everyone doesn't realize his family is responsible for murdering a Boston Police Officer.

Sentimental Value Cast Are Thankful for Subtitles



Sentimental Value Cast Are Thankful for Subtitles



Sentimental Value Cast Are Thankful for Subtitles

It's like nothing ever happened. The

The problem is that no one is going
them about this. That will be chang

McCabe is planning to go to court on Wednesday, and I pray to God she does because I have A LOT of questions for her.

This is the son Chris Albert is protecting.

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VSCO.CO



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Sentimental Value Cast Are Thankful for Subtitles



colinalbert34

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Last 2 I'd fuck w



You can't find a picture of Colin Albert where he isn't acting like a hardo and holding up a middle finger or a fist. Here he is with Brian's son (his cousin) Brendan Albert, and a young man in a sling who some suspect was in 34 Fairview Road at some point, with the caption "fuck yo gang."

Sentimental Value Cast Are Thankful for Subtitles



colinalbert34



Sentimental Value Cast Are Thankful for Subtitles

Follow

Fuck yo gang

This is a young man who was raised
people you're upset with is always
was raised to believe that there are
because his father is a Selectman, h

Canton cop, and the entire Canton Police Department and Massachusetts State Police exist to protect his long term well being.

These are dirty, dirty people. Kerry Roberts, Meg Kennedy, Jennifer McCabe, Chris Albert, Colin Albert, Brian Albert, Ken Berkowitz, Michael Proctor, and many more. Don't be fooled by the fact that they live in a nice town like Canton, sign their kids up for little league, and live in nice homes. This a filthy, disgusting, arrogant gang of white trash that has no bottom. But mark my words – justice is coming for all of them soon.

Stay tuned.

Do Not Sell or Share My Personal Information

Sentimental Value Cast Are Thankful for Subtitles

EXHIBIT F

9:59



< 19



2 People >

witnesses have lawyers

Turtle Boy 2nd



Enjoy the show?

I'm at dinner

I haven't listened

But I will when I get home

Let me ask Karen

HA
HA

"Yes, all the shows are good."

Turtle Boy 2nd



Lol man you're a good friend

But tell him the body was moved. Tell him to think about what was happening that night/ other potential non-Albert witnesses..

I feel like Mark Felt - but tell him I can't be more specific because this is a key witness that no one knows about. Think Aidan, think...

Turtle Boy 2nd



Deep throat?

Drive by Fairview Aidan, I promise you will be shocked at how small that front yard is in person. Would be tough to plant a body without being seen.

Turtle Boy 2nd

Small enough for John to run to the front door



iMessage



10:00



2 People

"NOT PUBLIC but you can share with Aidan - phone was not signaling for most of the night. Best guess is Airplane mode."

Turtle Boy 2nd



How do they know

"Aidan - I am telling you we know for sure when and by whom the body was planted."

1 Reply

"There's a specific reason he was placed exactly where he was."

"Don't believe everything you're reading about Levinson. If Proctor is lying about some things, he can lie about anything. Sarah was not called before the GJ. To spare her from perjury. So all we have is Proctor's synopsis of her interview."

"Aidan - I am telling you we know for sure when and by whom the body was planted."

Turtle Boy 2nd



I believe her. She's been right about everything so far

"It's not a party goer. Not anyone who was at the party."

"Me asking, was Higgins a party goer?"



Images



EXHIBIT G

[REDACTED]

From: Marc Diller
Sent: Sunday, February 22, 2026 6:30 PM
To: [REDACTED]
Subject: Fw: O'Keefe v Read

Get Outlook for iOS

From: Aaron D. Rosenberg <arosenberg@sheehan.com>
Sent: Friday, February 20, 2026 3:26:54 PM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: Daniel Buck <DBuck@dillerlaw.com>; Tamara Smith Holtslag <tsmith@peabodyarnold.com>; Lincoln A. Rose <lrose@peabodyarnold.com>; Alexandra M. Beaton <ambeaton@peabodyarnold.com>; David Hassett <dhassett@hassettdonnelly.com>; jdealy@hassettdonnelly.com <jdealy@hassettdonnelly.com>; Thomas Tang <ttang@tangmaravelis.com>; Michael Bell <mbell@tangmaravelis.com>; Art Maravelis <amaravelis@tangmaravelis.com>; Sarah Shipley <sshipley@tangmaravelis.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: Re: O'Keefe v Read

Marc,

I understand that you, like us, have yet to produce to the other defendants the documents received from the NDAO. We cannot do so until we review and analyze the cell phone extraction data included only in the documents produced to us. Therefore, please provide copies of the documents you received from the NDAO to the other defendants, and we will provide the phone records to you and the other defendants pursuant to our agreement below afterwards, when they are ready.

Thanks,

Aaron

Aaron D. Rosenberg
Sheehan Phinney Bass & Green, PA
(617) 897-5664
arosenberg@sheehan.com

From: Marc Diller <MDiller@dillerlaw.com>
Sent: Wednesday, August 6, 2025 2:37 PM
To: Aaron D. Rosenberg <arosenberg@sheehan.com>
Subject: RE: O'Keefe v Read

Confirmed.

Very Truly Yours,

Marc Diller, Esq.
(617)523-7771
www.dillerlaw.com
  

From: Aaron D. Rosenberg <aaronberg@sheehan.com>
Sent: Wednesday, August 6, 2025 9:24 AM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Marc,

Following up again – please confirm that you've passed on to the District Attorney's Office the instruction we agreed to on Friday.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

28 State Street, 22nd Floor, Boston, MA 02109
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aaronberg@sheehan.com
www.sheehan.com

From: Aaron D. Rosenberg
Sent: Tuesday, August 5, 2025 12:54 PM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Marc,

We agree to suspend the Proctor deposition after we conclude our questioning. Please provide your available dates.

Please also confirm that you provided the instruction we agreed on to the DA's Office.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

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arosenberg@sheehan.com

www.sheehan.com

From: Aaron D. Rosenberg

Sent: Monday, August 4, 2025 9:53 AM

To: Marc Diller <MDiller@dillerlaw.com>

Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag

<TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com;

JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com;

JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>;

Charles M. Waters <cwaters@sheehan.com>

Subject: RE: O'Keefe v Read

Marc – Thanks. We'll get back to you shortly regarding your deposition proposal. Please confirm that you've instructed the District Attorney's Office to handle the phones as we agreed below.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

28 State Street, 22nd Floor, Boston, MA 02109

T 617.897.5664

arosenberg@sheehan.com

www.sheehan.com

From: Marc Diller <MDiller@dillerlaw.com>

Sent: Friday, August 1, 2025 11:24 AM

To: Aaron D. Rosenberg <arosenberg@sheehan.com>

Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag

<TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com;

JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com;

JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>;

Charles M. Waters <cwaters@sheehan.com>

Subject: RE: O'Keefe v Read

Aaron and Chris,

Thank you for the dialogue.

Just for the record, it was never our intent to request the physical devices go to us and we've never requested the NDAO preserve it for us.

As you may recall, we previously sent a preservation letter to your team expecting that the devices and the vehicle will go back into your client's possession promptly.

We are interested in the underlying data extracted from such phones and assumed that the NDAO would only be turning over non privileged data pursuant to the language in our subpoena. We will agree to ask the NDAO to turn such data over to your team first for review and you can identify what privileges, if any, you believe apply to the extracted phone data. We still reserve our rights to enforce the full subpoena, but agree in the interim to this protocol.

During our conversation, we also discussed the deposition of Proctor. I am scheduled to be in trial at that time. If all parties agree to suspend the Proctor deposition before our need to inquire of the witness, I will not object to Proctor's deposition occurring in the near future before our team has the benefit of receiving and processing all the documents and materials we believe your client and her team had the benefit of during the prosecution of the criminal case. Then, the continued Proctor deposition can be scheduled at agreeable dates and times in the future after we had a reasonable opportunity to prepare. Proctor's deposition will not be concluded until we have an opportunity to cross at an agreeable future date/time.

If that's agreeable to all parties here, I will provide you available dates occurring after my August trial.

If anything stated here does not comport with your understanding of our discussion, please let me know. Thank you.

Very Truly Yours,

Marc Diller, Esq.
(617)523-7771
www.dillerlaw.com
  

From: Aaron D. Rosenberg <arosenberg@sheehan.com>
Sent: Friday, August 1, 2025 10:47 AM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Marc,

Thanks for the time just now. As discussed, I'm confirming that we have agreed that you will instruct the Norfolk District Attorney's Office to produce to my office, rather than yours, any and all cell phones belonging to or seized from Karen

Read, which are in the Office's possession (Request 19), and any iCloud data belonging to Karen Read, which is in the Office's possession (Request 18). We will then review that information, withhold privileged or otherwise non-discoverable material, and produce the rest along with a privilege log. Please confirm your agreement by email.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

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T 617.897.5664

arosenberg@sheehan.com

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From: Aaron D. Rosenberg

Sent: Thursday, July 31, 2025 7:58 PM

To: Marc Diller <MDiller@dillerlaw.com>

Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>

Subject: RE: O'Keefe v Read

OK – I just sent an invite.

Aaron D. Rosenberg

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T 617.897.5664

arosenberg@sheehan.com

www.sheehan.com

From: Marc Diller <MDiller@dillerlaw.com>

Sent: Thursday, July 31, 2025 7:31 PM

To: Aaron D. Rosenberg <arosenberg@sheehan.com>

Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>

Subject: Re: O'Keefe v Read

10

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From: Aaron D. Rosenberg <arosenberg@sheehan.com>
Sent: Thursday, July 31, 2025 5:25:00 PM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com <cgeorge@melicklaw.com>; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com <wkeville@melicklaw.com>; mpalladini@melicklaw.com <mpalladini@melicklaw.com>; lrose@peabodyarnold.com <lrose@peabodyarnold.com>; JDealy@HassettDonnelly.com <JDealy@HassettDonnelly.com>; DHassett@HassettDonnelly.com <DHassett@HassettDonnelly.com>; CMcCaffrey@HassettDonnelly.com <CMcCaffrey@HassettDonnelly.com>; JDonovan@SloaneWalsh.com <JDonovan@SloaneWalsh.com>; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Marc – What time tomorrow are you available to confer?

Aaron D. Rosenberg

SHEEHAN PHINNEY

28 State Street, 22nd Floor, Boston, MA 02109
T 617.897.5664
arosenberg@sheehan.com
www.sheehan.com

From: Aaron D. Rosenberg
Sent: Thursday, July 31, 2025 9:57 AM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Marc,

You have served a subpoena that seeks my client's privileged and otherwise non-discoverable information, which is housed on devices that the subpoena recipient does not have the lawful right to hold, much less produce to you. The meet and confer is to determine whether or not we can reach a compromise where you would direct the recipient of your subpoena to provide the responsive devices to us, so that we can review the documents for privilege and other protections, withhold those that are not discoverable, and produce the rest to you. If not, we will file a motion for a protective order seeking to impose such a protocol. This is why the Rule requires you to produce a copy of the subpoena to all parties prior to serving it, which you did not do – so that we can attempt to avoid the need for that kind of motion.

What time tomorrow? I can do 9:30am-12pm or after 4pm.

Thanks,

Aaron

Aaron D. Rosenberg

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T 617.897.5664

arosenberg@sheehan.com

www.sheehan.com

From: Marc Diller <MDiller@dillerlaw.com>
Sent: Thursday, July 31, 2025 12:37 AM
To: Aaron D. Rosenberg <arosenberg@sheehan.com>
Cc: Daniel Buck <DBuck@dillerlaw.com>
Subject: RE: O'Keefe v Read

Aaron,

Sorry I've been tied up recently. I should be able to meet and confer on Friday.

I'm not sure I understand the topic for the meet and confer when I'm not the DA's office and I don't have anything to do with their possession of your client's devices.

Also, if there is a meet and confer you are seeking with me, is it necessary to include every lawyer involved in the case in such an email chain?

Very Truly Yours,

Marc Diller, Esq.
(617)523-7771
www.dillerlaw.com



From: Aaron D. Rosenberg <arosenberg@sheehan.com>
Sent: Wednesday, July 30, 2025 8:54 AM
To: Marc Diller <MDiller@dillerlaw.com>
Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; rose@peabodyarnold.com; JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>
Subject: RE: O'Keefe v Read

Mark,

I'm following up on my email below. Please let me know your availability for a 9C conference. We need to address this issue quickly because these are devices that the District Attorney's Office does not have rightful possession of and which contain privileged and protected client information.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

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From: Aaron D. Rosenberg

Sent: Monday, July 28, 2025 3:20 PM

To: Marc Diller <MDiller@dillerlaw.com>

Cc: David Mehan <DMehan@dillerlaw.com>; cgeorge@melicklaw.com; Tamara Smith Holtslag

<TSmith@peabodyarnold.com>; wkeville@melicklaw.com; mpalladini@melicklaw.com; lrose@peabodyarnold.com;

JDealy@HassettDonnelly.com; DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com;

JDonovan@SloaneWalsh.com; Daniel Buck <DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>;

Charles M. Waters <cwaters@sheehan.com>

Subject: RE: O'Keefe v Read

Mark,

Please let me know your availability to confer later this week and next week regarding your subpoena. Your subpoena requests, among other things, full copies of all data from Ms. Read's phones that are in the possession of the District Attorney's Office. Those phones contain large amounts of unrelated and irrelevant data as well as privileged material. Some of those phones were also seized in the context of a criminal investigation subsequent to the investigation of Mr. O'Keefe's death, which did not result in an indictment. Because of the timing, those phones are even more likely to contain large amounts of privileged data. We can discuss our thoughts in more detail during our conference, but we think the best way to handle this is for the phones and other similar devices to be returned to our custody so that we can access and review all of the data and produce anything that is otherwise discoverable along with Ms. Read's other documents.

Thanks,

Aaron

Aaron D. Rosenberg

SHEEHAN PHINNEY

28 State Street, 22nd Floor, Boston, MA 02109

T 617.897.5664

arosenberg@sheehan.com

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From: Marc Diller <MDiller@dillerlaw.com>

Sent: Friday, July 25, 2025 6:41 PM

To: Aaron D. Rosenberg <arosenberg@sheehan.com>; David Mehan <DMehan@dillerlaw.com>;

cgeorge@melicklaw.com; Tamara Smith Holtslag <TSmith@peabodyarnold.com>; wkeville@melicklaw.com;

mpalladini@melicklaw.com; lrose@peabodyarnold.com; JDealy@HassettDonnelly.com;

DHassett@HassettDonnelly.com; CMcCaffrey@HassettDonnelly.com; JDonovan@SloaneWalsh.com; Daniel Buck

<DBuck@dillerlaw.com>; Damon M. Seligson <dseligson@sheehan.com>; Charles M. Waters <cwaters@sheehan.com>

Subject: O'Keefe v Read

The following was served today.



Marc Diller, Esq.

Phone (617) 523-7771

Email: marc@dillerlaw.com

Website: www.dillerlaw.com

Address: 50 Congress St., Ste.
420

Boston, MA 02109



Effective 9/1/2022 our address changed. Please update your records with our new address 50 Congress St. Ste. 420 Boston, MA 02109.

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EXHIBIT H

Date Filed 2/23/2026 5:12 PM
Superior Court - Plymouth
Docket Number 2483CV00882



PLS

EXHIBIT I

https://lawampm.sharepoint.com/:f/s/External/IgBWLSliK_1yQYS-I7f8bpjIAXzt_oRfY8i6K353Ov2udMk?e=aUYgxK (copy link and paste in browser)

EXHIBIT J

https://lawampm.sharepoint.com/:f/s/External/IgA_xn5U8q_OQaVgUa9MWXjjAVdApDiQsB2_uHSeGBUOLsVk?e=rroDte (copy link and paste in browser)