

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

SUPERIOR COURT DEPARTMENT  
NO. 2282-CR-0117

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COMMONWEALTH OF	)
MASSACHUSETTS,	)
Plaintiff	)
	)
V.	)
	)
KAREN READ,	)
Defendant	)
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**MOTION FOR INSPECTION, ACCESS AND INDEPENDENT  
FORENSIC TESTING OF JOHN O'KEEFE'S CLOTHING**

Now comes the defendant, Karen Read ("Ms. Read", or "the Defendant"), and respectfully moves this Honorable Court pursuant to Mass. R. Crim. P. 14, to compel the Commonwealth to allow, forthwith, counsel and/or forensic experts for the Defendant to inspect and perform independent forensic testing upon the clothing worn by John O'Keefe at the time of his death.

As grounds therefore, the Defendant states the following:


1. On May 27, 2022, the undersigned counsel e-mailed Norfolk County Assistant District Attorney Adam Lally of the desire of the defense to inspect John O'Keefe's clothing and requested a date and time to accomplish that. See Yannetti E-mail, dated May 27, 2022, 2022, attached hereto as **Exhibit 1**;
2. August 12, 2022, this Court, Krupp, J., presiding, ordered the Commonwealth to allow the Defendant's, "attorney, investigator and/or retained forensic expert to inspect and photograph all clothing of John O'Keefe, seized by the police in connection with this matter. See, "Defendant's Motion to Inspect John O'Keefe's Clothing," dated August 11, 2022, attached hereto as **Exhibit 2**;

3. On December 16, 2022, the undersigned counsel again e-mailed ADA Lally to request an inspection of John O'Keefe's clothing. See Yannetti E-mail, dated December 16, 2022, 2022, attached hereto as **Exhibit 3**;
4. On January 5, 2023, the entire defense team participated in a Zoom videoconference with ADA Lally, informing him of the discovery material that was still outstanding, including the fact that the defense still needed to inspect John O'Keefe's clothing. During that meeting, ADA Lally informed counsel during that meeting that he would let us know by January 16, 2023 when the defense could inspect the clothing;
5. On January 5, 2023, Attorney Elizabeth Little e-mailed ADA Lally to confirm that he would be contacting the crime lab so that he could let us know by January 16, 2023 as to when the defense could inspect the clothing. See Little E-mail, dated January 5, 2023, attached hereto as **Exhibit 4**;
6. On January 16, 2023 – and to date – the Defendant has yet to receive an answer from the Commonwealth as to when the defense team can inspect, photograph and perform forensic testing on John O'Keefe's clothing.

The Defendant further relies on the attached "Affidavit of Counsel" in support of this motion.

Wherefore, the Defendant request that this motion be allowed, and further, that a deadline for a response is set within one week.

Respectfully Submitted,  
For the Defendant,  
Karen Read  
By her attorney,



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Dated: February 1, 2023