

COMMONWEALTH OF MASSACHUSETTS
SUPREME JUDICIAL COURT FOR SUFFOLK COUNTY

SUFFOLK, ss.

NO. SJ-2023-_____

NORFOLK SUPERIOR COURT
NO. 2282-CR-00117

KAREN READ,

Petitioner

v.

THE COMMONWEALTH OF MASSACHUSETTS,

Respondent

**PETITIONER-DEFENDANT KAREN READ'S MOTION TO IMPOUND
RECORD APPENDIX PURSUANT TO SJC RULE 1:15**

Respectfully submitted,

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PETITIONER-DEFENDANT KAREN READ'S MOTION TO IMPOUND
RECORD APPENDIX PURSUANT TO SJC RULE 1:15

Now comes the Petitioner-Defendant, Karen Read, and respectfully moves this Honorable Court pursuant to Supreme Judicial Court Rule 1:15 to impound the Record Appendix in this matter. As grounds for this motion, the Petitioner-Defendant respectfully states the following:

1. As noted on the Single Justice Case cover sheet, attached to the brief in this matter, the attached autopsy photos, as well as reports containing personal identifying information of parties and witnesses, were previously ordered impounded by the Hon. Cannone, J., Regional Administrative Justice of the Norfolk County Superior Court.
2. Additionally, a number of motions in the lower court have been ordered impounded, or filed impounded. Similarly, previous production related to a Rule 17 Motion separate from the subject matter of this petition was ordered impounded.
3. The information gleaned from that previous production is referenced at several points in motions included in the Record Appendix.
4. Out of an abundance of caution, and due to previous Orders of Impoundment, requests for impoundment, and

inadvertent disclosures of information that otherwise *should* have been impounded in the lower Court, the Petitioner-Defendant respectfully suggests that there is good cause to impound the **entire** Record Appendix in this matter for the duration this matter is pending before this Court.

5. The Petitioner-Defendant further respectfully suggests that nothing in the **Brief** itself requires impoundment under SJC Rule 1:15, and respectfully requests that the brief remain publicly available.

Wherefore, the Petitioner-Defendant, Karen Read, respectfully requests that this Honorable Court allow her motion to impound the entire Record Appendix in this matter.

Respectfully submitted,

For the Petitioner-Defendant, Karen Read

By her attorney,

/s/ Ian F. Henchy
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AFFIDAVIT OF COUNSEL IN SUPPORT OF PETITIONER-DEFENDANT
KAREN READ'S MOTION TO IMPOUND RECORD APPENDIX PURSUANT
TO SJC RULE 1:15

I, Ian F. Henchy, do hereby depose and state that the following is true to the best of my knowledge and belief:

1. I am an attorney licensed to practice in Massachusetts. My office address is: Yannetti Law Firm, 44 School St., Suite 1000A, Boston, MA 02108. I represent Karen Read in connection with the above-referenced case, along with Attorney David Yannetti, Attorney Alan Jackson, and Attorney Elizabeth Little.
2. Due to prior orders of the Court to impound autopsy photos of the decedent, reports containing personal identifying information, Grand Jury testimony, and numerous requests by the Defendant in the lower court matter to impound information in the case, I believe that there is good cause to impound the entire Record Appendix in this matter for the duration of the Single Justice matter.
3. I have marked the front page of the Record Appendix "Impounded", in accordance with SJC Rules.

Signed under the pains and penalties of perjury, this 1st
day of September, 2023.

/s/ Ian F. Henchy
Ian F. Henchy, Esq.