

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

**MOTION TO ADMIT CALEB MASON, ESQ.
PRO HAC VICE IN THIS CASE**

Defendant Karen Read respectfully requests that the Court admit *pro hac vice* in this case
Caleb Mason, Esq. of Werksman Jackson & Quinn LLP in Los Angeles, California.

Attorney Mason has submitted the required Registration Statement for *Pro Hac Vice*
Attorneys to the Board of Bar Overseers. A copy of that Statement with the BBO's
acknowledgement of receipt and of Attorney Mason's payment of the required fee will be filed
when received. As stated under the pains and penalties of perjury in that Statement, Attorney
Mason is a member in good standing of the California bar. California grants Massachusetts
attorneys the ability to apply for *pro hac vice* admission.

Attorney Mason has also submitted a sworn affidavit evidencing the appropriateness of his admission. His admission would aid in Read's defense in this case because Attorney Mason is a law partner in the same firm as Attorneys Alan Jackson and Eliza Little and with whom he has worked in their collective representation of Read in the criminal proceeding based on the same underlying facts at issue in this case for approximately three years. He therefore has an intricate knowledge of the relevant facts that will assist her other counsel in defending these claims. It would be unfair to deny Read the available benefit of Attorney Mason's experience.

Undersigned counsel, who are members of this bar, will remain as co-counsel to Read along with Attorney Mason throughout this case.

WHEREFORE, Read respectfully requests that the Court allow this Motion and grant Caleb Mason, Esq. permission to appear in this case *pro hac vice*.

Respectfully submitted,

KAREN READ,

By her attorney,

/s/ Damon M. Seligson

Damon M. Seligson (BBO# 632763)

Charles M. Waters (BBO# 631425)

Aaron D. Rosenberg (BBO# 684826)

Sheehan Phinney Bass & Green, PA

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Dated: August 11, 2025

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served upon all parties of record by electronic mail on August 11, 2025.

/s/ Damon M. Seligson

Damon M. Seligson

EXHIBIT A

BOARD OF BAR OVERSEERS
One Beacon Street, 10th Floor, Boston, Massachusetts 02108

REGISTRATION STATEMENT FOR PRO HAC VICE ATTORNEYS

ATTORNEY NAME (First, MI, Last, Suffix): Caleb E. Mason

Email Address: cmason@werksmanjackson.com

Complete Business/Mailing Address:
Werksman Jackson & Quinn LLP, 888 West Sixth Street, Fourth Floor, Los Angeles, CA 90017

Business Phone Number: (213) 688-0460

Board of Bar Overseers Administrative Use Only	
Date Received:	<u>8/12/2025</u>
Amount Paid:	<u>\$355.00</u>
Date Confirmation Emailed:	<u>8/12/2025</u>

Court in which pro hac vice admission is sought: Plymouth County Superior Court - Plymouth

Contact number for court: (508) 747-8400

Party to be represented: Karen Read

Docket number of case (if available): 2483CV00692

Jurisdictions to which you have been admitted: (Use second page for additional jurisdictions.)

Type	Jurisdictions	License Numbers
State	<u>California Central District Court</u>	<u>246653</u>
Federal	<u>US Court of Appeals for the Ninth Circuit</u>	
Federal	<u>US District Court for the Central District of California</u>	

I certify that (check one): ☐ the party I am representing in the case for which I am seeking pro hac vice admission is an indigent client, and I understand that no pro hac vice fee is due, or ☒ I have included the required pro hac vice fee.

Further, I certify, under the pains and penalties of perjury, that I am admitted to practice and in good standing in every jurisdiction where I am admitted, and I acknowledge that I am subject to discipline by the Massachusetts Supreme Judicial Court and the Board of Bar Overseers. I understand I am limited in my legal practice in Massachusetts to the case identified above.

I certify the information I have supplied the Board of Bar Overseers is true and complete.

Caleb E. Mason
Signature

August 8, 2025
Date

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Jurisdictions continued:

Type	Jurisdictions	License Number
Federal	U.S. Court Of Appeals, Eighth Circuit	
Federal	U.S. Court Of Appeals, Eleventh Circuit	
State	Georgia Southern District Court	
State	Arkansas Western District Court	
State	Nevada District Court	
State	New Jersey District Court	

Please mail the completed form to:

**Board of Bar Overseers, One Beacon Street, 10th Floor
Boston, MA 02108**