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COMMONWEALTH OF MASSACHUSETTS
PLYMOUTH, SS.

SUPERIOR COURT DEPT.
C.A. NO. 2483CV00692

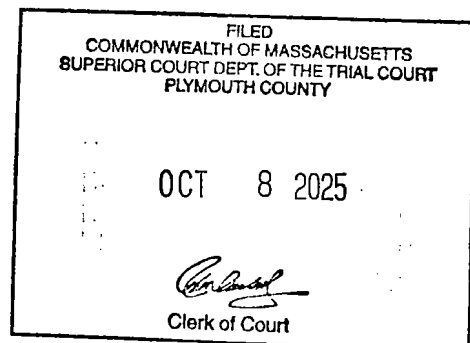
PAUL O'KEEFE, INDIVIDUALLY & AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF JOHN
JOSEPH O'KEEFE, III; MARGARET O'KEEFE,
INDIVIDUALLY AND AS GRANDPARENT / GUARDIAN
OF KAYLEY FURBUSH; and JOHN O'KEEFE, II,

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' MOTION FOR COUNSEL TO APPEAR *PRO HAC VICE*,
BIBIANNE FELL

NOW COME the Plaintiffs in the above-captioned civil action, by and through their undersigned counsel, and respectfully move this Honorable Court, pursuant to M.G.L. c. 221 § 46A, and in accordance with S.J.C. Rule 3.15, to permit BIBIANNE FELL, Esquire of Fell Law, PC to appear *pro hac vice* as co-counsel with Marc Diller of Diller Law, LLP. As grounds therefore, the undersigned counsel respectfully state as follows:

1. Bibianne Fell, Esquire is a member of good standing of the Bar of the State of California and has practiced law in the State of California since December 3, 2004.
2. The Commonwealth of Massachusetts affords reciprocal *pro-hac-vice* privileges to members in good standing with the Bar of the State of California, so long as they are associated with an attorney who is good standing with the Bar of the Commonwealth of Massachusetts.

3. For this litigation in the Commonwealth of Massachusetts, Plymouth County Superior Court, Bibianne Fell will work closely with the Boston, Massachusetts law firm Diller Law, LLP, 50 Congress Street, Suite 420, Boston, MA 02109, in order to comply with this Honorable Court's rules and procedures.
4. Plaintiffs respectfully desire Bibianne Fell to appear as co-counsel of record so that she may actively participate in the above-captioned action.
5. Plaintiff is not aware of any potential prejudice to Defendant in this action should Bibianne Fell be permitted to appear as counsel for the limited purposes of this action.
6. In further support of this Motion, the undersigned has filed here with the Affidavit of Bibianne Fell in Support of Plaintiffs' Motion for Counsel to Appear *Pro Hac Vice*.

WHEREFORE, Plaintiff respectfully requests this Honorable Court permit BIBIANNE FELL to appear *pro hac vice* as co-counsel in the above-captioned civil action.

Respectfully submitted,
Plaintiffs,
By and through counsel:

/s/ Marc Diller
Marc Diller, Esq.
BBO #: 644997
DILLER LAW, LLP
50 Congress Street, Suite 420
Boston, MA 02109
(617) 523 – 7771
MDiller@DillerLaw.com

Date: Friday, October 3, 2025