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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.

FILED
COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPT. OF THE TRIAL COURT
PLYMOUTH COUNTY

OCT 8 2025

[Signature]
Clerk of Court

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.

* Upon review, the petitioner has satisfied the necessary requirements for admission pro hac vice. Motion allowed.

