

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,

Civil Action No. 2483cv00692

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.

RULE 9C CERTIFICATION

I, Damon M. Seligson, counsel for Defendant Karen Read ("Ms. Read"), do hereby
certify as follows:

1. On July 3, 2025, by electronic mail to all counsel of record, my colleague Aaron
Rosenberg, Esq. sent notice of Ms. Read's intention to seek the admission of Alan Jackson, Esq.
and Elizabeth Little, Esq. In his email, Mr. Rosenberg expressly inquired if the parties would
assent.

2. We did not receive any response to Mr. Rosenberg's inquiry.

3. On August 6, 2025, by electronic mail to all counsel of record, I repeated the inquiry about whether the parties would assent to the admission of Attorneys Jackson and Little.

4. We did not receive any response to the repeated inquiry.

5. Accordingly, on August 11, 2025, pursuant to Superior Court Rule 9A, by electronic mail we served all counsel of record with the instant pro hac vice motions to admit Attorneys Jackson, Little and Caleb Mason. In the communication to all counsel, I offered to discuss the motions pursuant to Superior Court Rule 9C.

6. We did not receive any response to the repeated inquiry.

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)
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Dated: August 29, 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 29, 2025.

/s/ Damon M. Seligson

Damon M. Seligson