

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

**DECLARATION OF CALEB MASON, ESQ. IN SUPPORT OF
MOTION TO ADMIT HIM *PRO HAC VICE* IN THIS CASE**

I, Caleb Mason, Esq., certify as follows:

1. I am an attorney at Werksman Jackson & Quinn LLP in Los Angeles, California.
2. I am counsel to defendant Karen Read, and represented Ms. Read in the criminal proceedings based on the same underlying facts as this case for more than two years.
3. I am a member in good standing of the California bar.
4. I am not, and have never been, the subject of disciplinary proceedings in any jurisdiction.

5. I have not previously had a *pro hac vice* admission to this Court revoked for misconduct.

6. I have read and agree to comply with the Massachusetts Rules of Civil Procedure and the other applicable rules and orders of this Court.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY

Dated: July 8, 2025


Caleb Mason, Esq.

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