

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

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

AUG 29 2025


Clerk of Court

**MOTION TO ADMIT ALAN JACKSON, ESQ.
PRO HAC VICE IN THIS CASE**

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

Attorney Jackson 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 Jackson's payment of the required fee will be filed
when received. As stated under the pains and penalties of perjury in that Statement, Attorney
Jackson is a member in good standing of the California bar. California grants Massachusetts
attorneys the ability to apply for *pro hac vice* admission.

* Upon review, the motion is allowed. The sworn declaration of Alan Jackson satisfies the requirements under Massachusetts law for admission pro hac vice on this civil case. 9/15/25