

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

**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.

Attorney Jackson has also submitted a sworn affidavit evidencing the appropriateness of his admission. His admission would aid in Read's defense in this case because Attorney Jackson has represented Read in the criminal proceeding based on the same underlying facts at issue in this case for approximately three years. He therefore has an intricate knowledge of the relevant facts that will assist her other counsel in defending these claims. It would be unfair to deny Read the available benefit of Attorney Jackson's experience.

Undersigned counsel, who are members of this bar, will remain as co-counsel to Read along with Attorney Jackson throughout this case.

WHEREFORE, Read respectfully requests that the Court allow this Motion and grant Alan Jackson, Esq. permission to appear in this case *pro hac vice*.

Respectfully submitted,

KAREN READ,

By her attorney,

/s/ Damon M. Seligson

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Dated: August 11, 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 11, 2025.

/s/ *Damon M. Seligson*

Damon M. Seligson

EXHIBIT A

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Jurisdictions continued:

Type	Jurisdictions	License Number

Please mail the completed form to:

**Board of Bar Overseers, One Beacon Street, 10th Floor
Boston, MA 02108**