

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.

**MOTION TO ADMIT ELIZABETH LITTLE, ESQ.  
PRO HAC VICE IN THIS CASE**

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

Attorney Little 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 Little's payment of the required fee will be filed when received. As stated under the pains and penalties of perjury in that Statement, Attorney Little is a member in good standing of the following bars: California, U.S. Court of Appeals for the Ninth Circuit, and U.S. District Court for the Central District of California. The courts listed above grant Massachusetts attorneys the ability to apply for *pro hac vice* admission.

Attorney Little has also submitted a sworn affidavit evidencing the appropriateness of his admission. Her admission would aid in Read's defense in this case because Attorney Little has represented Read in the criminal proceeding based on the same underlying facts at issue in this case for approximately three years. She 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 Little's experience.

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

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

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)

Sheehan Phinney Bass & Green, PA

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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**

**BOARD OF BAR OVERSEERS**  
One Beacon Street, 10<sup>th</sup> Floor, Boston, Massachusetts 02108

**REGISTRATION STATEMENT FOR PRO HAC VICE ATTORNEYS**

ATTORNEY NAME (First, MI, Last, Suffix): Elizabeth Little

Email Address: elittle@werksmanjackson.com

Complete Business/Mailing Address:  
Werksman Jackson & Quinn LLP, 888 West Sixth Street, Fourth Floor, Los Angeles, CA 90017

Business Phone Number: (213) 688-0460

| Board of Bar Overseers<br>Administrative Use Only |                  |
|---------------------------------------------------|------------------|
| Date Received:                                    | <u>8/12/2025</u> |
| Amount Paid:                                      | <u>\$355.00</u>  |
| Date Confirmation Emailed:                        | <u>8/12/2025</u> |

Court in which pro hac vice admission is sought: Plymouth County Superior Court - Plymouth

Contact number for court: (508) 747-8400

Party to be represented: Karen Read

Docket number of case (if available): 2483CV00692

Jurisdictions to which you have been admitted: (Use second page for additional jurisdictions.)

| Type           | Jurisdictions                                                   | License Numbers |
|----------------|-----------------------------------------------------------------|-----------------|
| <u>State</u>   | <u>State of California</u>                                      | <u>309944</u>   |
| <u>Federal</u> | <u>US Court of Appeals for the Ninth Circuit</u>                | <u></u>         |
| <u>Federal</u> | <u>US District Court for the Central District of California</u> | <u></u>         |

I certify that (check one): ☐ the party I am representing in the case for which I am seeking pro hac vice admission is an indigent client, and I understand that no pro hac vice fee is due, or ☒ I have included the required pro hac vice fee.

Further, I certify, under the pains and penalties of perjury, that I am admitted to practice and in good standing in every jurisdiction where I am admitted, and I acknowledge that I am subject to discipline by the Massachusetts Supreme Judicial Court and the Board of Bar Overseers. I understand I am limited in my legal practice in Massachusetts to the case identified above.

I certify the information I have supplied the Board of Bar Overseers is true and complete.

[Signature]  
Signature

7/7/25  
Date

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**Jurisdictions continued:**

| Type | Jurisdictions | License Number |
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**Please mail the completed form to:**

**Board of Bar Overseers, One Beacon Street, 10<sup>th</sup> Floor  
Boston, MA 02108**