

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED August 13, 2024 12:29 PM FILING ID: 88B5DB235397C CASE NUMBER: 2024CV30763</p>
<p>Plaintiffs: ROSS BERMAN, an individual; JASON H. KARP, an individual; IMJ I LLC, a Delaware limited liability company; RACHEL FARBER REVOCABLE TRUST, STEPHEN FARBER REVOCABLE TRUST, and RED CLOUD CAPITAL, LLC, a Connecticut limited liability company;</p> <p>Plaintiff-Intervenors: TREVOR GALLUP, an individual; and LYNN HONDERD, an individual,</p> <p>v.</p> <p>Defendants: BELLROCK BRANDS, INC., a British Columbia corporation, BRB DB HOLDINGS, INC., a Delaware corporation, BRB MARY'S HOLDINGS CORP., a Delaware corporation, DIXIE BRANDS (USA) INC., a Delaware corporation, MARY'S OPERATIONS, LLC, a Colorado limited liability company, MARY'S PETS, LLC, a Colorado limited liability company, MARY'S NUTRITIONALS, LLC, a Colorado limited liability company, DB FINANCE, NEVADA, LLC, a Nevada limited liability company, and DB OKLAHOMA, LLC, a Colorado limited liability company.</p>	<p style="text-align: center;"><input type="checkbox"/> COURT USE ONLY <input type="checkbox"/></p> <hr/> <p>Case Number: 2024CV30763</p> <p>Division: 466</p>
<p>Applicant Attorney: Meghan W. Cassidy Michigan Bar No: P60356 Cassidy Law, PLC 3910 Telegraph Road, Ste. 200 Bloomfield Hills, MI 48302\</p> <p>(248) 387-9180 / (248) 593-5000 (248) 301-0080 (Fax) E-mail: MWC@MCassidylaw.com</p> <p>Sponsoring Attorneys: Danielle Beem, CO Bar No. 45189 Beem & Isley, P.C. 730 Seventeenth Street, Suite 850 Denver, Colorado 80202 Phone: (303) 894-8100 E-mail: dcbeem@beemlaw.net</p>	
<p style="text-align: center;">VERIFIED MOTION FOR <i>PRO HAC VICE</i> ADMISSION OF MEGHAN W. CASSIDY</p>	

Pursuant to C.R.C.P 121 § 1-2, and Rule 205.3, Meghan W. Cassidy of Cassidy Law, PLC of Bloomfield Hills, Michigan, moves for *pro hac vice* admission to practice before this Court in the above-captioned matter.

AS GROUNDS FOR THIS MOTION, Meghan W. Cassidy states and shows the Court the following:

1. Under Rule 205.3, an attorney and counselor at law in good standing from any other jurisdiction in the United States may, in the discretion of a Colorado court of record, be permitted to participate before the Court in a trial, argument, or other proceeding in the particular case in which the attorney is employed, provided that a member in good standing of the Bar of the State of Colorado is associated in such cause at all stages of the case.

2. Meghan W. Cassidy of Cassidy Law, PLC is a member in good standing of the Bar of the State of Michigan, Bar N: P60356.

3. Meghan W. Cassidy is in good standing in all Bars wherever admitted and has not been subject to any order of discipline or disability by any Bar or had any request for *pro hac vice* admission denied or revoked.

4. Meghan W. Cassidy has not previously sought *pro hac vice* admission in Colorado.

5. Meghan W. Cassidy acknowledges that she is subject to all applicable provisions of the Colorado Rules of Professional Conduct, the Colorado Rules of Civil Procedure, and other court rules, and that she has read and will follow such rules.

6. Danielle Beem, Registration No. 45189, is a member in good standing of the Bar of the State of Colorado.

7. Danielle Beem will be present and participate in a meaningful and substantial manner throughout the proceedings and trial of this matter.

8. Meghan W. Cassidy is representing James A. Harvey in this matter and has notified Mr. Harvey of the Motion requesting permission for her to appear in this matter in this Colorado Court.

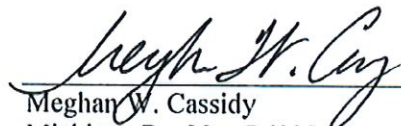
9. Meghan W. Cassidy is concurrently paying the required fee to the Clerk of the Colorado Supreme Court and separately providing a copy of this Verified Motion to the Clerk of the Supreme Court Office of Attorney Registration, 1300 Broadway, Suite 510, Denver, Colorado 80203.

10. An affidavit setting forth Meghan W. Cassidy's qualifications and compliance is attached.

11. By execution of the attached verification, the Colorado licensed Sponsoring Attorneys verify their association on this matter.

WHEREFORE, counsel respectfully requests that this Court admit Meghan W. Cassidy *pro hac vice*, to practice before the Court in this case.

Respectfully submitted on the 13th day of August, 2024.



Meghan W. Cassidy
Michigan Bar No: P60356
Cassidy Law, PLC
3910 Telegraph Road, Ste. 200
Bloomfield Hills, MI 48302
(248) 387-9180
MWC@MCassidylaw.com

And



Danielle Beem, Registration No: 45189
BEEM & ISLEY, P.C.
730 Seventeenth Street, Ste. 850
Denver, CO 80202
(303) 894-8100

VERIFICATION

The Verified Motion Requesting *Pro Hac Vice* Admission of Meghan W. Cassidy was affirmed and signed by Meghan W. Cassidy this 12th day of August, 2024.

Amy Beth Zielinski

Notary Public
AMY BETH ZIELINSKI
Notary Public, State of Michigan
County of Oakland
My Commission Expires Oct 22, 2024
Acting in the County of *Cook*



VERIFICATION

The Verified Motion Requesting *Pro Hac Vice* Admission of Meghan W. Cassidy was affirmed and signed by Danielle Beem, Colorado Registration Number 45189, this 13th day of August, 2024.

Danielle Beem
Notary Public

MEGAN THOMAS
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20184016984
MY COMMISSION EXPIRES APRIL 18, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 13th day of August, 2024, I filed a true and correct copy of the foregoing Verified Motion Requesting *Pro Hac Vice* Admission of Meghan W. Cassidy and accompanying Affidavit of Meghan W. Cassidy with the Clerk of the Supreme Court office of the Attorney Registration and electronically with the Clerk of the Colorado Supreme Court using the Integrated Colorado Courts E-Filing System (ICCES) and served copies upon the all counsel of record.

Danielle Beem

**DISTRICT COURT, CITY AND COUNTY OF
DENVER, COLORADO**

1437 Bannock Street
Denver, CO 80202

Plaintiffs: ROSS BERMAN, an individual; JASON H. KARP, an individual; IMJ I LLC, a Delaware limited liability company; RACHEL FARBER REVOCABLE TRUST, STEPHEN FARBER REVOCABLE TRUST, and RED CLOUD CAPITAL, LLC, a Connecticut limited liability company;

Plaintiff-Intervenors: TREVOR GALLUP, an individual; and LYNN HONDERD, an individual,

v.

Defendants: BELLROCK BRANDS, INC., a British Columbia corporation, BRB DB HOLDINGS, INC., a Delaware corporation, BRB MARY'S HOLDINGS CORP., a Delaware corporation, DIXIE BRANDS (USA) INC., a Delaware corporation, MARY'S OPERATIONS, LLC, a Colorado limited liability company, MARY'S PETS, LLC, a Colorado limited liability company, MARY'S NUTRITIONALS, LLC, a Colorado limited liability company, DB FINANCE, NEVADA, LLC, a Nevada limited liability company, and DB OKLAHOMA, LLC, a Colorado limited liability company.

Applicant Attorney:

Meghan W. Cassidy Michigan Bar No: P60356
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Bloomfield Hills, MI 48302\
(248) 387-9180 / (248) 593-5000
(248) 301-0080 (Fax)
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Sponsoring Attorneys:

Danielle Beem, CO Bar No. 45189
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COURT USE ONLY

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AFFIDAVIT OF MEGHAN W. CASSIDY

1. My name is Meghan W. Cassidy. I am the managing member of Cassidy Law, PLC at 3910 Telegraph Road, Ste. 200, Bloomfield Hills, MI 48302 (248) 387-9180, and counsel for James A. Harvey in the above referenced action.

2. I received a Juris Doctor Degree from Loyola University College of Law in in 1999. I was admitted to the State Bar and Courts of Michigan in 1999.

3. I am in good standing in all Bars wherever admitted, and no disability, disciplinary, or grievance proceedings have been filed or are pending against me. I have never had a request for *pro hac vice* admission denied or revoked.

4. I have not established domicile in the State of Colorado.

5. I have not established a place in Colorado from which I hold myself out to the public as practicing Colorado law.

6. I have not previously sought *pro hac vice* admission in Colorado.

7. The Party represented is James A. Harvey who has been notified of the Motion requesting permission for me to appear in this matter in this Colorado Court.

8. I acknowledge that I am subject to all applicable provisions of the Colorado Rules of Professional Conduct, the Colorado Rules of Civil Procedure, and other court rules; that I have read and will follow these rules throughout the *pro hac vice* admission; and that the Verified Motion complies with those rules.

9. The Colorado licensed attorney who will associate with me is: Danielle Beem, Registration No: 45189; Beem & Isley, P.C., 730 Seventeenth Street, Suite 850, Denver, Colorado 80202; (303) 894-8100.

10. I am concurrently paying the required fee to the Clerk of the Colorado Supreme Court and separately providing a copy of the Verified Motion and this Affidavit to the Clerk of the Supreme Court Office of Attorney Registration, 1300 Broadway, Suite 510, Denver, Colorado 80203.

Dated: August 12, 2024

Meghan W. Cassidy
Meghan W. Cassidy

Subscribed and sworn before me this
12th day of August, 2024.

Amy Beth Zielinski

AMY BETH ZIELINSKI
Notary Public, State of Michigan
County of Oakland
My Commission Expires Oct. 22, 2024
Acting in the County of Cass



STATE BAR OF MICHIGAN

CERTIFICATE OF GOOD STANDING

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This certifies that Meghan W. Cassidy, P60356 of Bloomfield Hills, Michigan is an active member of the State Bar of Michigan in good standing.

He/She was admitted to practice in Michigan on November 19, 1999 in Oakland County and became a member of the State Bar of Michigan on November 29, 1999.



A handwritten signature in black ink, reading "Peter W. Cunningham".

Peter W. Cunningham, Executive Director
August 09, 2024