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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUFFOLK SUPERIOR COURT
CIVIL ACTION NO. 2384CV01461 *BL52*
24989
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GLENN WILDER, JEANINE CUNNINGHAM,
JEANETTE SMALL, JOANNE GIBSON,
JENNIFER COLCLASURE,
MARSHALL JOLOTTA,
PAMELA BISHOP and CYNTHIA KELLEY,
individually and on behalf of
all similarly situated persons,

Plaintiffs,

v.

PRESIDENT & FELLOW OF HARVARD
COLLEGE a/k/a Harvard College, and
CARL J. SHAPIRO INSTITUTE
FOR EDUCATION AND RESEARCH AT
HARVARD MEDICAL SCHOOL AND BETH
ISRAEL DEACONESS MEDICAL CENTER,
INC., a/k/a Harvard Medical School,

Defendants.

2026 MAY -6 P 3:13
JOHN E. POWERS III
CLERK/MAGISTRATE
SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE

**ASSENTED TO VERIFIED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE
PURSUANT TO MASSACHUSETTS GENERAL LAWS C. 221, 46A**

Shannon Pennock, Esquire, Movant herein, and respectfully represents the following:

1. Movant resides in St. Petersburg, Florida.
2. Movant is not a resident of the State of Massachusetts.
3. Movant is an attorney at Morgan & Morgan, with offices at 111 2nd Avenue NE, Suite 1600, St. Petersburg, Florida 33701.
4. Movant has been retained personally or as a member of the above-named law firm on June 21, 2023, by Plaintiffs, to provide legal representation in connection with the above-





styled matter now pending before the above-named court of the State of Massachusetts.

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5. Movant is an active member in good standing and currently eligible to practice law in Massachusetts.

6. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against Movant in the preceding 5 years.

7. Movant either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

8. Movant is not an inactive member of The Massachusetts Bar.

9. Movant is not now a member of The Massachusetts Bar.

10. Movant is not a suspended member of The Massachusetts Bar.

11. Movant is not a disbarred member of The Massachusetts Bar nor has Movant received a disciplinary resignation or disciplinary revocation from The Massachusetts Bar.

12. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Massachusetts General Laws C. 221, 46A.

13. Local counsel of record associated with Movant in this matter is Ryan Lang, who is an active member in good standing of The Massachusetts Bar and has offices at 155 Federal Street, Suite 1502 Boston, MA 02110, telephone (857) 383-4915.

14. Movant has read the applicable provisions of Massachusetts general Laws C. 221, 46A of the Rules Regulating The Massachusetts Bar and certifies that this verified motion complies with those rules.

15. Movant agrees to comply with the provisions of the Massachusetts Rules of



Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Massachusetts.



WHEREFORE, Movant respectfully requests permission to appear in this court for these cases only.

ASSENTED TO,	RESPECTFULLY SUBMITTED,
<p>Defendants, By their attorneys, MANATT PHELPS & PHILLIPS, LLP</p> <hr/> <p>Joan A. Lukey, BBO #307340 jlukey@manatt.com Martin F. Murphy, BBO #363250 mfimurphy@manatt.com 177 Huntington Avenue, Suite 2500 Boston, MA 02115 Tel: (617) 646-1400</p>	<p>The Plaintiff(s), By their attorneys,</p> <p><u>/s/ Ryan Lang</u> Ryan Lang, Esquire Massachusetts Bar No: 708051 Mike Morgan (Pro Hac Vice Pending) Shannon Pennock (Pro Hac Vice Pending) MORGAN & MORGAN 155 Federal Street, Suite 1502 Boston, MA 02110 Primary Email: rlang@forthepeople.com Phone: (904) 361-4440 Fax: (904) 366-7022</p>

DATED: April 3, 2026

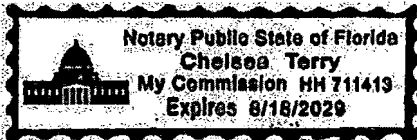
ST. PETERSBURG, FLORIDA)

I, Shannon Pennock, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter, that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief


Shannon Pennock

SWORN TO and subscribed before me in my presence on April 27th, 2026, by SHANNON PENNOCK, who is personally known to me.


Chelsea Terry
Notary Public
My commission expires 8/18/2029





CONSENT TO ACT AS LOCAL COUNSEL

I, Ryan Lang, an attorney qualified to practice in this Court, and pursuant to Massachusetts General Laws C. 221, 46A, consent to designation as the local attorney for Shannon Pennock and agree to serve as a designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case and any related proceedings, and upon whom papers shall be served.

/s/ Ryan Lang
Ryan Lang, Esquire
Massachusetts Bar No: 708051
MORGAN & MORGAN
155 Federal Street, Suite 1502
Boston, MA 02110
Primary Email: rlang@forthepeople.com
Phone: (904) 361-4440
Fax: (904) 366-7022
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served electronically via Massachusetts electronic file accompanied by payment of the \$100.00 filing fee and payment has been made to the Board of Bar Overseers.

/s/ Ryan Lang
Ryan Lang, Esquire

