

MATTHEW R. WALSH
19197 GOLDEN VALLEY RD #333
SANTA CLARITA, CA 91387
(661) 644-0012

Plaintiff In Pro Per,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MATTHEW R. WALSH
Plaintiff In Pro Per,

vs.

ROKOKO ELECTRONICS
(AND DOES 1 THROUGH 50,
INCLUSIVE)

Defendant

Case No.: 2:25-CV-05340-ODW-RAO

*[Assigned to Hon. Otis D. Wright, II,
Courtroom 5D; Hon. Rozella A. Oliver,
Courtroom 590]*

Hearing date: December 22, 2025
Hearing time: 1:30PM

**DECLARATION OF MATTHEW R.
WALSH re: PROOF OF MEET AND
CONFER**

I, Matthew R. Walsh, declare I am the Plaintiff in this matter. I have personal knowledge of the following facts and if called as a witness I could and would testify competently hereto. The documents and images included are true and accurate copies of documents and images I have either procured, or maintained and have not been altered. I hereby authenticate them under penalty of perjury.

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EXHIBIT 1

RE: Re:



matthew@winteryear.com

To: 'Ellena, Katherine J.'

Cc: 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

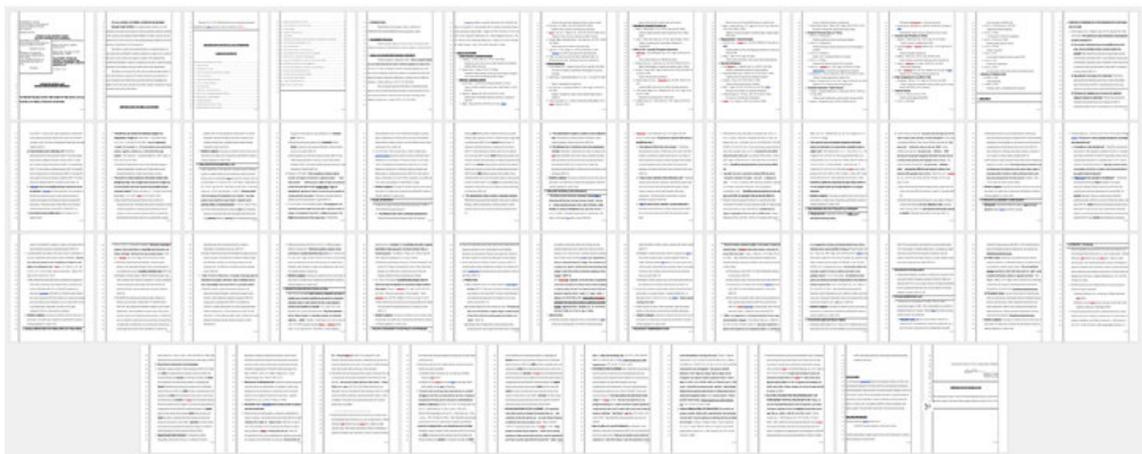
Mon 10/27/2025 1:01 PM

You replied to this message on 10/30/2025 3:59 PM.



Please see the attached draft settlement letter. Nothing contained in it should be deemed as a waiver of any kind.

Further, it should be noted that I am prepared to move for summary judgment on all claims including the ones contained in the letter (as shown below). The offer for these claims is not one born of the inability to litigate them. I simply believe early mutual disposition of these claims would be mutually beneficial. The evidence regarding the claims is very sound and has been third-party expert verified.



Thank you
Matthew R. Walsh

-----Original Message-----

From: Ellena, Katherine J. <KEllena@reedsmith.com>

Sent: Monday, October 27, 2025 12:14 PM

To: matthew@winteryear.com

Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>

Subject: RE: Re:

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EXHIBIT 2

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2 RE: Re:



3 Ellena, Katherine J. <KEllena@
4 To Matthew R. Walsh
Cc Graue, Emily H.; Galibois, Michael B.



10/24/2025

5 You replied to this message on 10/27/2025 12:04 PM.
6 We removed extra line breaks from this message.

7 Your choice. Let us know what time works for you for the meet and confer on October 30.

8 Katherine J. Ellena | Senior Associate
9 kellena@reedsmith.com

10 ReedSmith LLP
11 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell:
12 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080 Abu Dhabi | Atlanta | Athens |
13 Austin | Beijing | Brussels | Century City | Chicago | Dallas | Denver | Dubai | Frankfurt |
14 Greece | Hong Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich | New
15 York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai
16 | Silicon Valley | Singapore | Tysons | Washington DC | Wilmington

1 RE: RE:



2
3 Ellena, Katherine J. <KEllena@
4 To matthew@winteryear.com
Cc Graue, Emily H.; Galibois, Michael B.



10/22/2025

5 We removed extra line breaks from this message.

6 Mr. Walsh:

7 We are available for a meet and confer on Thursday, October 30. We can discuss the topics
8 raised in the Court's orders and your contemplated MSJ during the same call. We will also
9 review the joint report draft that you have circulated in the meantime. Let us know what time
on October 30 works for you.

10 Thanks,

11 Katherine J. Ellena | Senior Associate
12 kellena@reedsmith.com

13 **ReedSmith** LLP

14 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell:
15 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080 Abu Dhabi | Atlanta | Athens |
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York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai
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EXHIBIT 3

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2 RE: Re:



3 matthew@winteryear.com

To 'Ellena, Katherine J.'

Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

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Reply Reply All Forward ...

Thu 10/30/2025 4:00 PM

You replied to this message on 10/30/2025 4:14 PM.

Michael,
Katherine,
Thank you both for your time.

To recap and make a record going forward:

- We discussed in vivid detail the joint 26(f) report
- We discussed the motion for summary judgment moving on all counts plus possible amendments plus alter-ego / veil piercing
- We discussed the subpoenas; unfortunately we did not come to any agreements there but the Court doesn't require us to agree, just to try.
- We discussed you providing the trial dates and other dates, preferably not into 2027/2028.
- We discussed that we would utilize the ADR/mediation provided by the Court.
- We discussed that Rokoko is reviewing the settlement offer and will make a determination by November 15
- We discussed that you wish me to withdraw the RJN about fabricated caselaw and you indicated that you would oppose, I indicated the requisite time to do so has passed and you had disagreed. I further directed you to Docket #80-4 which details the forensic data checks on your LEXIS PDF files showing that the caselaw in fact does not exist as it was written, was misattributed and almost all were from void cases.
- We discussed you will not be open to allowing me additional interrogatories
- We discussed the discovery issues thus-far.
- We discussed that you wish to bifurcate, whereas I do not.
- We discussed that I would provide ESI protocol and a draft order
- We discussed that you wish there to be a protective order on everything. While I can understand some of it, I don't agree with all of it. I am open to compromise.
- We discussed Corridor Digital; some of the evidence I have including express admissions, shared relationships as witnesses who may have been there or know of those dealings, etc.
- We discussed that I intend to ask for leave of court to amend the complaint for defamation, or bring a new suit, and also possibly breach of contract.
- We discussed and agreed on positive, collaborative efforts moving forward.

I don't think I missed anything.
Thank you very much for both of your time,
Matthew R. Walsh

21 From: matthew@winteryear.com <matthew@winteryear.com>

22 Sent: Monday, October 27, 2025 1:01 PM

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EXHIBIT 4

Re: Subpoenas



Matthew R. Walsh (Winteryear Stur

To: 'Ellena, Katherine J.'

Cc: 'Graue, Emily H.,' 'Galibois, Michael B.'



10/30/2025

If there are problems with how this message is displayed, click here to view it in a web browser.

It may just be end of the day brain fog but reading them they appear to be identical. Feel free to address it if you wish, im just not seeing where they are different

Sent via BlackBerry Hub+ Inbox for Android

From: KEllena@reedsmith.com

Sent: October 30, 2025 4:27 PM

To: matthew@winteryear.com

Cc: EGraue@reedsmith.com; MGalibois@reedsmith.com

Subject: RE: Re: Subpoenas

Hi Matthew –

The document requests in the attached two Corridor subpoenas are different. This is what I was referring to on the call.

Katherine J. Ellena | Senior Associate

kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080

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From: matthew@winteryear.com <matthew@winteryear.com>

Sent: Thursday, October 30, 2025 4:15 PM

To: Ellena, Katherine J. <KEllena@reedsmith.com>

Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>

Subject: RE: Re: Subpoenas

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

In the interest of resolving this issue, both the subpoena served on you and the one served on corridor