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]

DECLARATION OF MATTHEW R. WALSH re: COMPLAINT EXHIBITS

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. All text, images and exhibits herein are true and accurate copies which I have received or have made and I am authenticating all of them under the penalty of perjury.

Exhibit list:

- **Exhibit 1** – Nintendo release SKU for *The Next World*.
- **Exhibit 2** – Lotcheck steps for platform approval.
- **Exhibit 3** – Third-party contracts (redacted due to NDA).
- **Exhibit 4** – Third-party introduction by a fan.
- **Exhibit 5** – Plaintiff's contracts with third parties (explicitly shown before purchase).
- **Exhibit 6** – Studio photos with cast and crew, including sound studio and motion capture.
- **Exhibit 7** – 40% discount on equipment after disclosure of third-party contracts.
- **Exhibit 8** – Gen 1 animation vs Gen 2 Smartsuit.
- **Exhibit 9** – Firmware destroying older devices (evidence of intentional damage).
- **Exhibit 10** – Unnecessary remote support sessions, despite diagnostics showing the true issue.
- **Exhibit 11** – "Wires" blamed for failure, despite diagnostics showing otherwise.
- **Exhibit 12** – Secret live diagnostics sent to Defendant's servers.

- **Exhibit 13** – Defendant's refusal to repair sensors.
- **Exhibit 14** – Firmware destruction of sensors and refusal to replace.
- **Exhibit 15** – Hollywood release event photos and clips.
- **Exhibit 16** – Cast and crew laid off after production halt.
- **Exhibit 17** – IGN® press release for alpha-reveal trailer.
- **Exhibit 18** – Missed release windows due to sensor destruction.
- **Exhibit 19** – Sony suspends Plaintiff's developer account.
- **Exhibit 20** – Console generation obsolescence.
- **Exhibit 21** – Re-tooling and redevelopment costs.
- **Exhibit 22** – Approx. 850 raw animations.
- **Exhibit 23** – Original script for *The Next World*.
- **Exhibit 24** – Fight sequences with stuntman Aaron D. Alexander.
- **Exhibit 25** – Weapon and tactical sequences with Aaron D. Alexander.
- **Exhibit 26** – Dialogue and cinematic performances.
- **Exhibit 27** – Deletion and collection of Plaintiff's intellectual property.
- **Exhibit 28** – Defendant admitting to selling animation assets.
- **Exhibit 29** – Defendant's clients (Netflix, Sony, EA, Square Enix).
- **Exhibit 30** – False GDPR compliance and server location claims.
- **Exhibit 31** – Hidden code harvesting user animations.

- **Exhibit 32** – Harvested intellectual property.
- **Exhibit 33** – Defendant's admission of harvesting.
- **Exhibit 34** – Video evidence showing harvesting after disconnection.
- **Exhibit 35** – Keep-alive NAT hole-punching code used for persistent access.
- **Exhibit 36** – Forced reconnection to harvest data.
- **Exhibit 37** – False GDPR compliance and U.S. servers.
- **Exhibit 38** – U.S.-based servers confirmed.
- **Exhibit 39** – Opt-out mechanisms not allowing users to stop data collection.
- **Exhibit 40** – Plaintiff never subscribed to "Teams" but data was still collected.
- **Exhibit 41** – Hardcoded authentication bypass in the software.
- **Exhibit 42** – Defendant's backtrack after confrontation (misappropriation denial).
- **Exhibit 43** – Terms before 2025 didn't grant license for IP use.
- **Exhibit 44** – Retroactive terms stripping CMI and allowing sublicensing.
- **Exhibit 45** – Trifork's acquisition of 22% of Rokoko Care and use of Plaintiff's data.
- **Exhibit 46** – Defendant's financial issues and prior insolvency.

- **Exhibit 47** – Defendant's pitch deck revealing IP misappropriation plan.
- **Exhibit 48** – Sale of Plaintiff's intellectual property after lawsuit began.
- **Exhibit 49** – Defendant admitting to collection and sale of IP.
- **Exhibit 50** – Defendant's commercial use of Plaintiff's intellectual property.
- **Exhibit 51** – Embedded CMI within animation files and metadata.
- **Exhibit 52** – Defendant's actions regarding intellectual property (retroactive terms).
- **Exhibit 53** – Example of Plaintiff's books and merchandise halted.
- **Exhibit 54** – TV series adaptation talks halted.
- **Exhibit 55** – Defendant training AI on Plaintiff's motion dataset.
- **Exhibit 56** – Defendant sublicensing Plaintiff's intellectual property.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of December, 2025, in Santa Clarita, California.

Matthew R. Walsh
Plaintiff In Pro Per

EXHIBIT 1

Nintendo release SKU for The Next World:

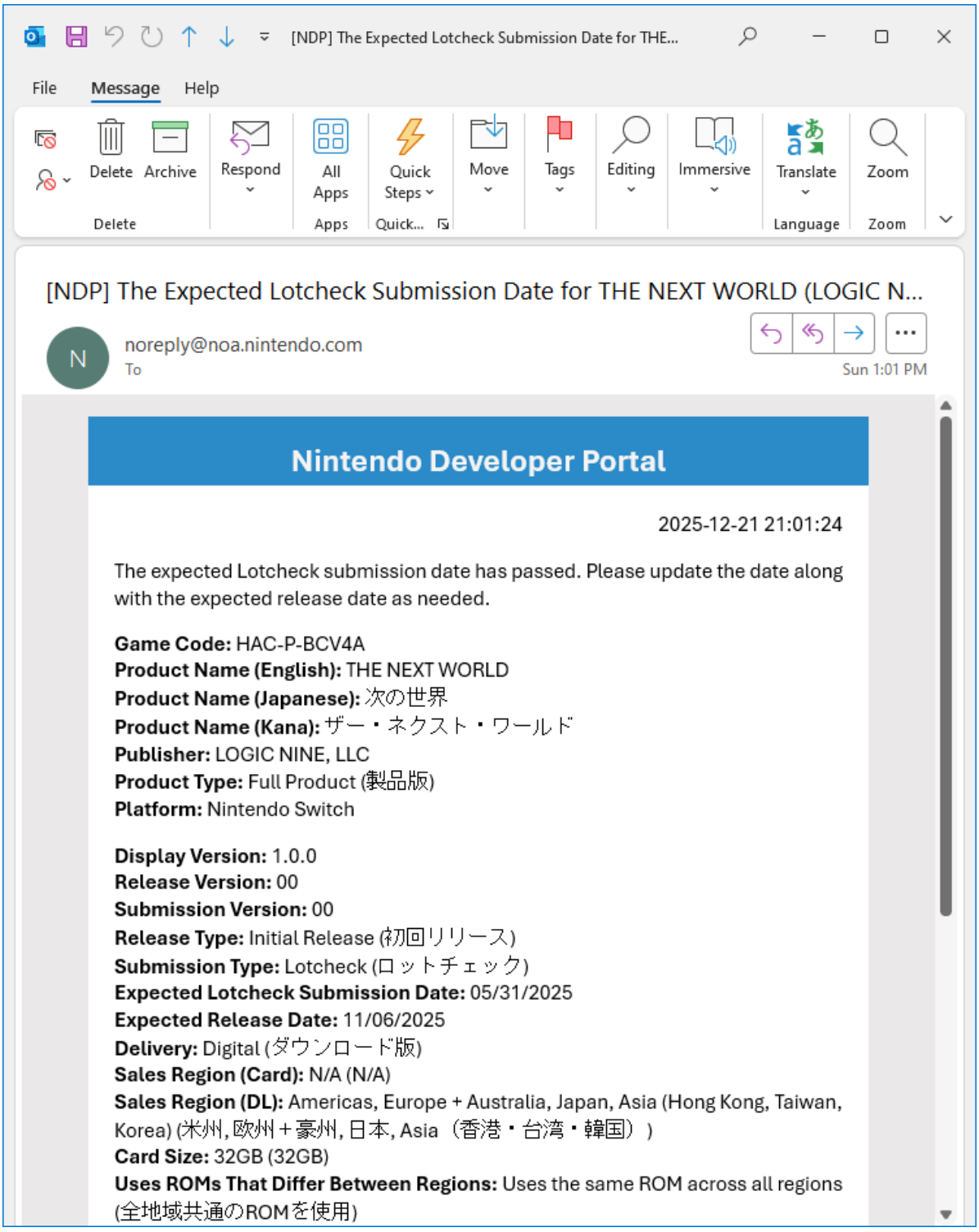
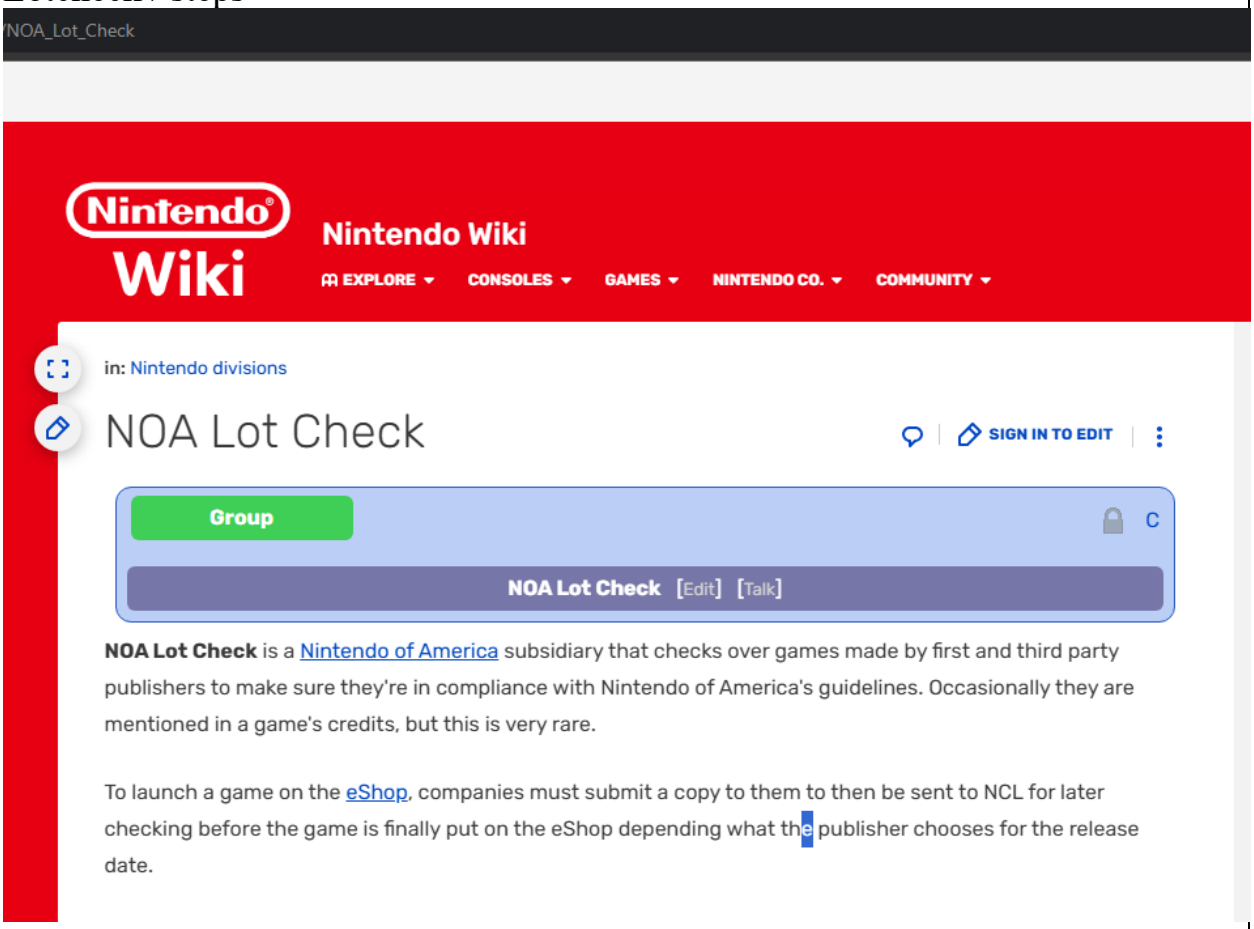


EXHIBIT 2

106 Lotcheck / steps



107

EXHIBIT 3

113 Third party contracts (redacted due to NDA)

WINTERYEAR STUDIOS LOS ANGELES

Music Composer Contract

This contract (the "Agreement") provides details for the services provided by Ron Wasserman [redacted] currently entitled "The Next World (video game)" (the "Project").

As a condition of The Producer hiring the Actor and other valuable considerations, the Parties to this Agreement agree as follows: Ron Wasserman will receive [redacted]% of all gross sales up to $[redacted] USD and retain all streaming rights and music rights, except, the Game may use the music in an unlimited fashion for any purpose within it's scope as defined below.

Project Title: The Next World (video game)

Role: Music Composer, in-studio VOX and recording

Actor Contact Email: [redacted]

114

WINTERYEAR STUDIOS LOS ANGELES

Acting / Performance Contract

This contract (the "Agreement") provides details for the services provided by Alexis Van Ess Mincolla (the "Actor") [redacted] project currently entitled "The Next World (video game)" (the "Project").

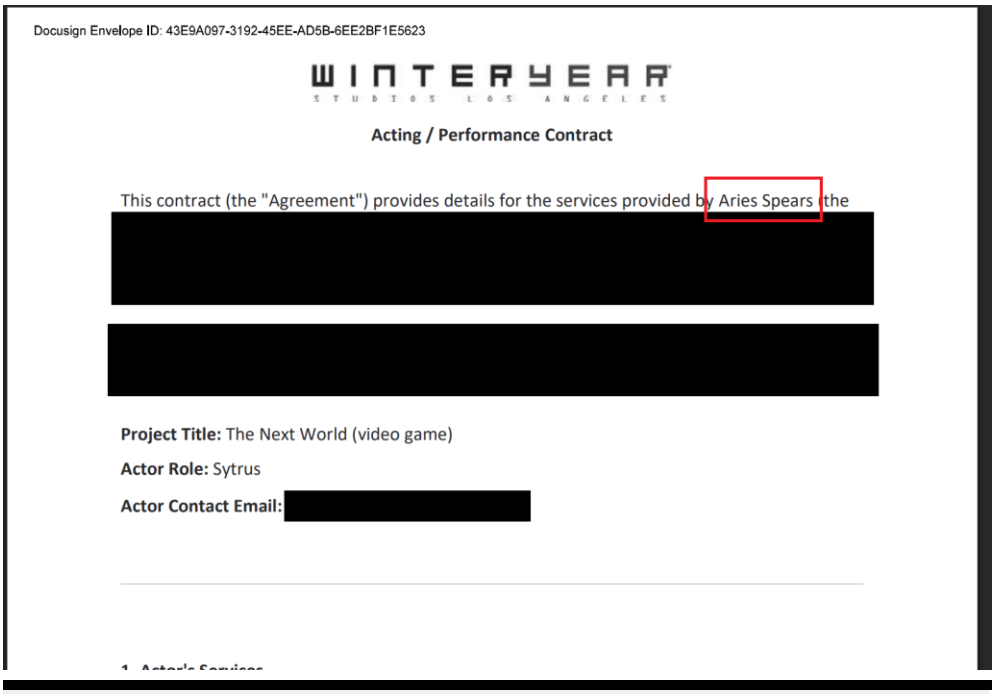
As a condition of The Producer hiring the Actor and other valuable considerations, the Parties to this Agreement agree as follows: Alexis will maintain the role of the main antagonist and license 3TEETH's first album for use within the Game [redacted]

Project Title: The Next World (video game)

Actor Role: Alexis Van Ess Mincolla (as himself)

Actor Contact Email: [redacted]

115



Docusign Envelope ID: 43E9A097-3192-45EE-AD5B-6EE2BF1E5623

WINTERYEAR STUDIOS LOS ANGELES

Acting / Performance Contract

This contract (the "Agreement") provides details for the services provided by Aries Spears (the [redacted]

Project Title: The Next World (video game)

Actor Role: Sytrus

Actor Contact Email: [redacted]

116

WINTERYEAR STUDIOS LOS ANGELES

Acting / Performance Contract

This contract (the "Agreement") provides details for the services provided by Kathleen Fisher [redacted] currently entitled "The Next World (video game)" (the "Project").

As a condition of The Producer hiring the Actor and other valuable considerations, the Parties to this Agreement agree as follows: [redacted]

Project Title: The Next World (video game)

Actor Role: 'Miss Manufactured' aka 'Eden'

Actor Contact Email: [redacted]

117

WINTERYEAR
STUDIOS LOS ANGELES

Acting / Performance Contract

This contract (the "Agreement") provides details for the services provided by Cody Derr (the [redacted] currently entitled "The Next World (video game)" (the "Project").

As a condition of The Producer hiring the Actor and other valuable considerations, the Parties to this Agreement agree as follows: [redacted]

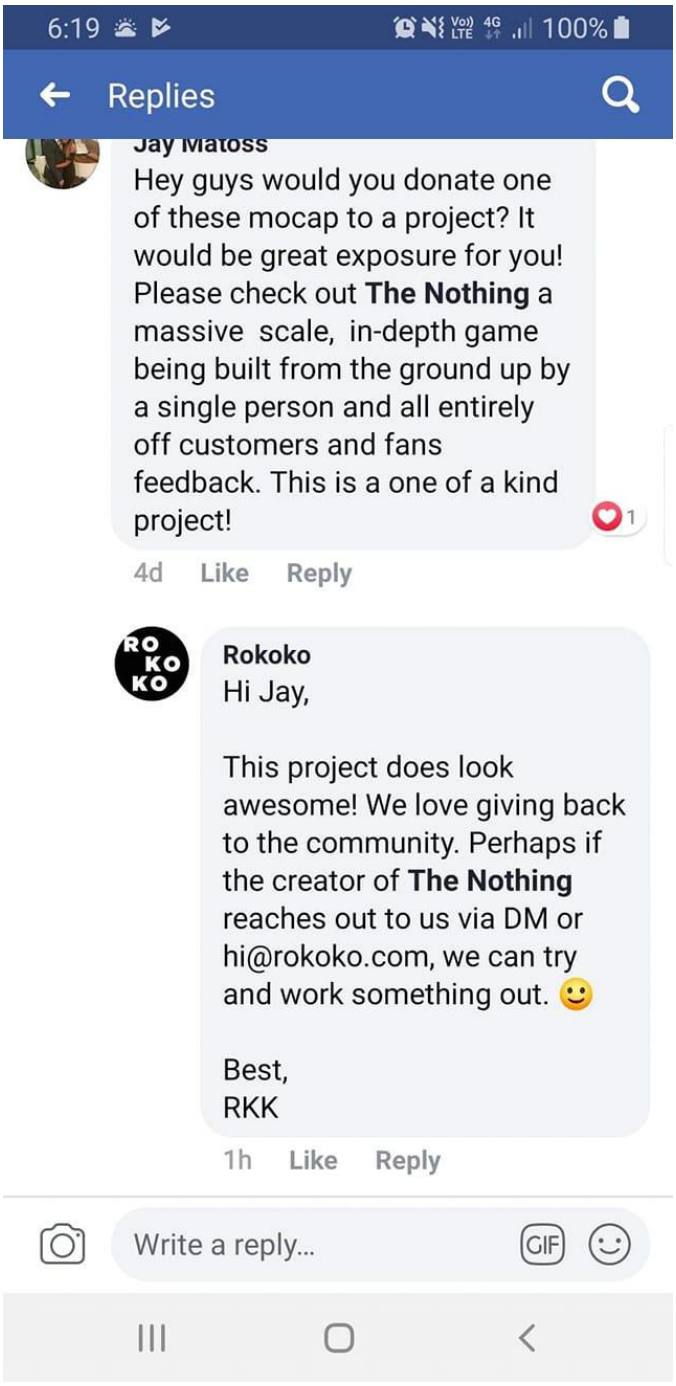
Project Title: The Next World (video game)

Actor Role: Dresden

Actor Contact Email: [redacted]

EXHIBIT 4

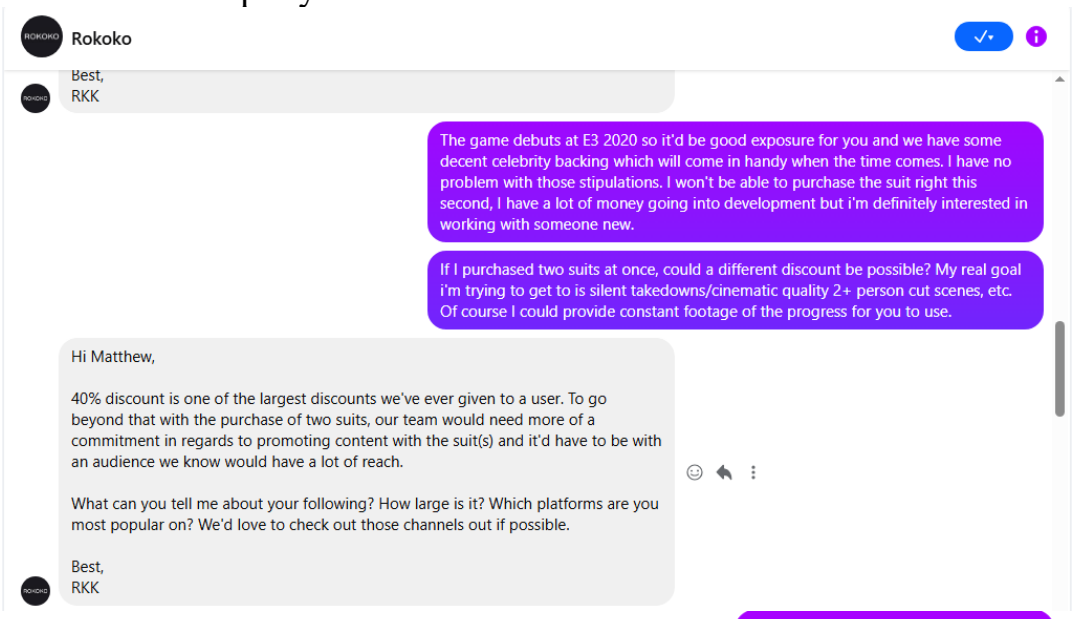
132 Third-party introduction by a fan



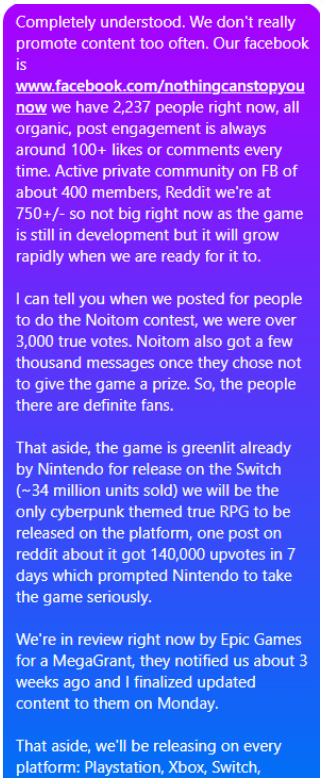
133

EXHIBIT 5

139 Before any purchase of Defendants equipment, they were made explicitly aware of
140 Plaintiff's third party contracts:



141

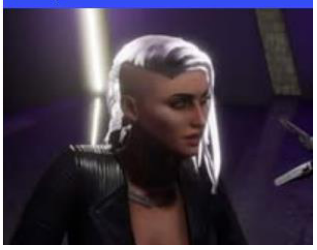


142

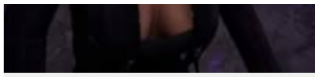
That aside, we'll be releasing on every platform: Playstation, Xbox, Switch, Steam, GOG and possibly Stadia, but we're waiting to hear back from Google.

The villain in the game is Alexis Mincolla of industrial metal band 3teeth, so we have outreach through him and his community, game soundtrack by Ron Wasserman https://www.imdb.com/name/nm2534328/ (the creator of the Power Rangers, X-Men and Dragon Ball-Z theme songs and soundtrack producer as well as 3,000 other shows) and some other unannounced people with some decent pull and outreach in the millions.

And like I said, we're debuting at E3 2020. So, that's a fairly large step. Release date if we get a handle on the mocap and get the actors all in-and-out should be shortly after E3 2020.



143



The Next World
Video Game

I don't expect anything, you've already been generous enough, but right now i'm basically stuck with one suit and facial rig gear, and I need two that can work together. So whether I buy two of yours or I, against my better judgment purchase a second Noitom suit, that's a decision I need to make. But I totally appreciate your offer and would love to work with you.

7/24/15, [illegible]PM

144

EXHIBIT 6

In the sound studio with Ron Wasserman and actors in the sound studio directing and recording vocals.

Plaintiff along with Alexis Mincolla (3teeth) in the studio doing table reads prior to recording

159 Plaintiff in the studio with the lead actor in the video game, Cody Derr during emotionally charged lines

160

161

162

163 In the mocap studio, with Defendant's suits, recording movements for 'The Next

164 World' (Plaintiff's game)

165

GET DOWN
TAKE COVER!
GRENADE!
I'M NOT DOING THIS! I'M NOT IN CONTROL OF MY BODY!
WHAT THE HELL NO NO NO!
I DON'T WANT TO JUMP!!! I DON'T WANT TO JUMP!
NO, NO, NO, NO!
THE NEXT WORLD
PROD.
ROLL
4
SCENE
57
TAKE
7
DIRECTOR: Matthew R. Walsh
CAMERA: A
DATE: 11/9/22
Day Night Int Ext Mos
Filter

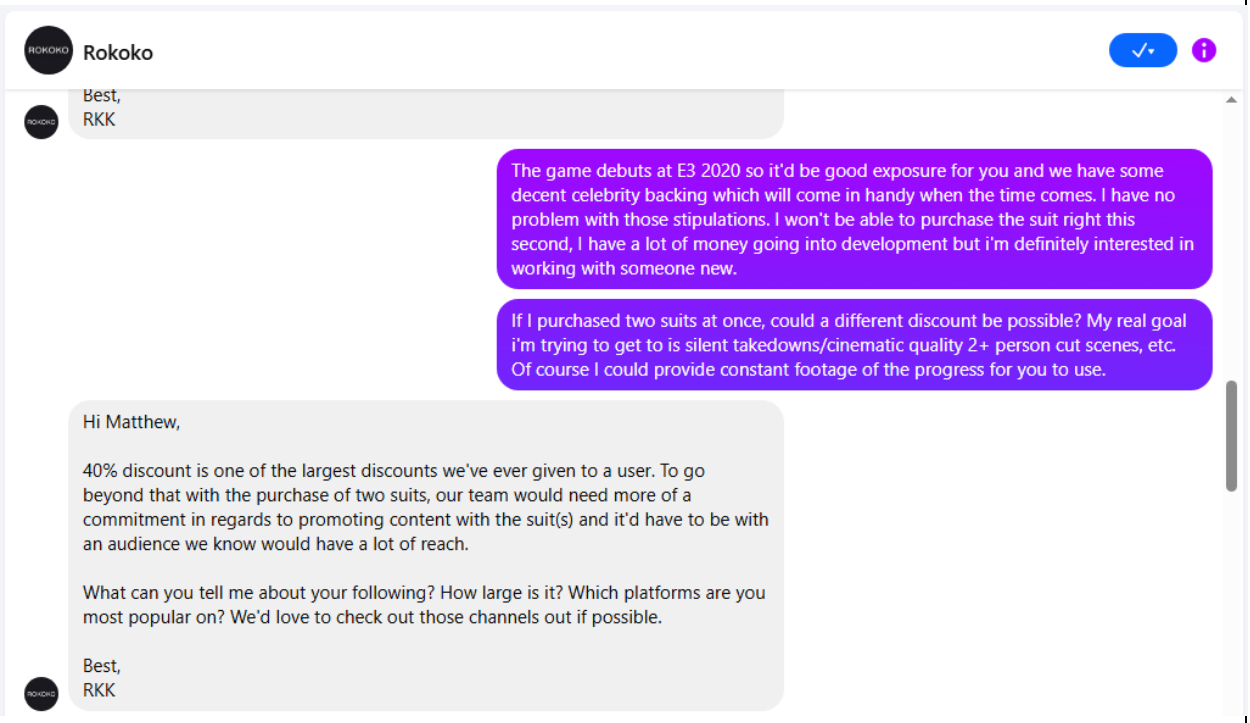
166

godox
godox
STAGE / CREW INSTRUCTIONS
SOUND
ONE' IS CALLED OUT
Rokoko
Audacity
WHEN 'CUT' IS CALLED OUT

EXHIBIT 7

175 Defendant offered 40% off after being made aware of those contracts.

176



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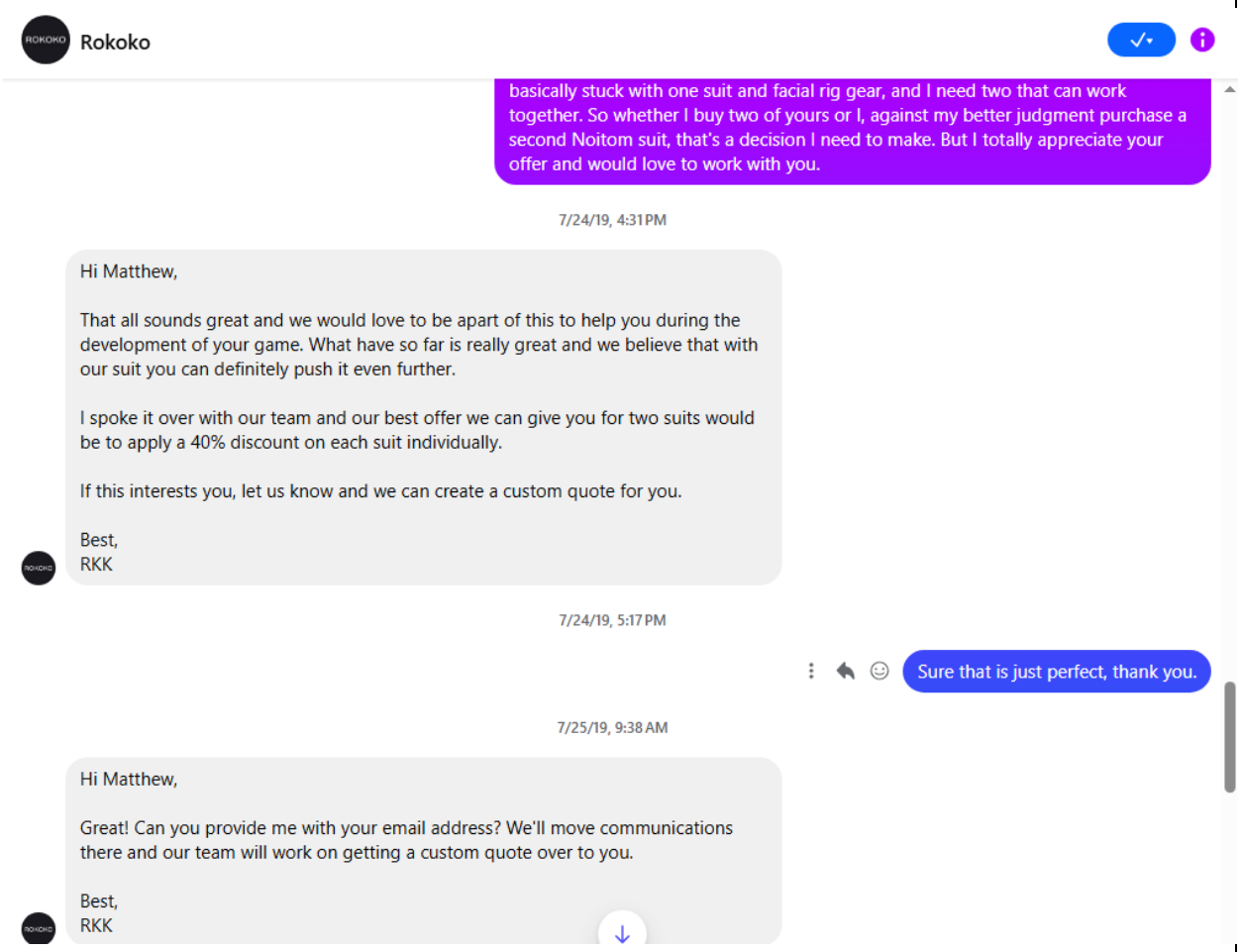
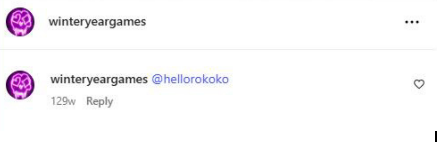


178

179 Plaintiff complied as promised:

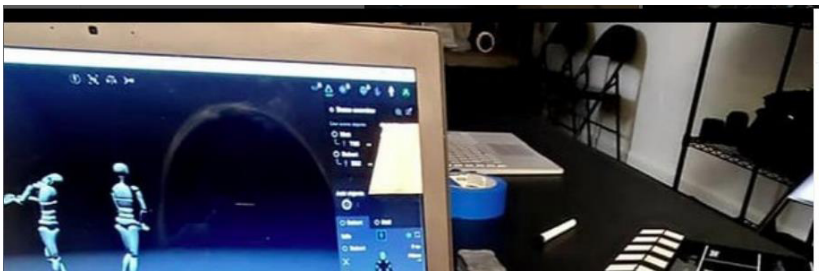
180

181



182

183



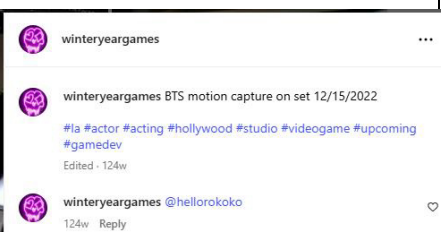
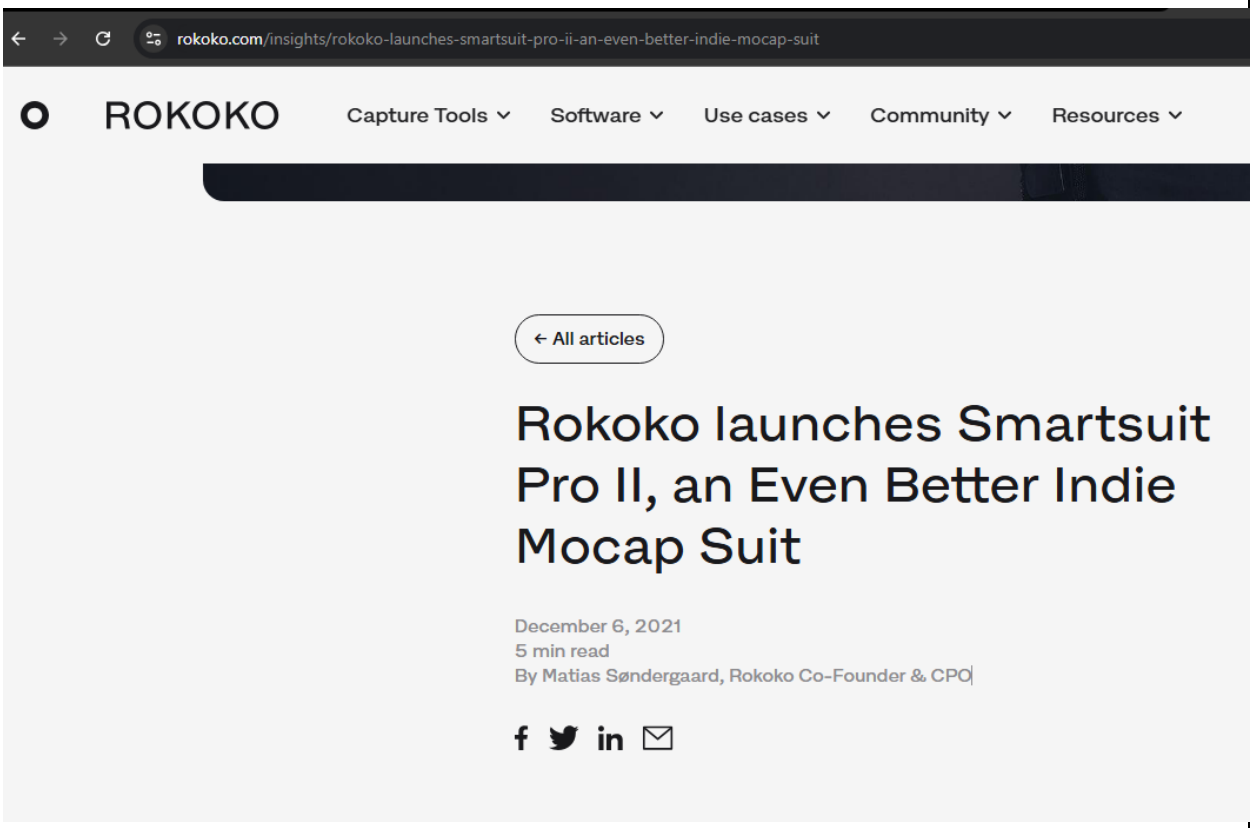
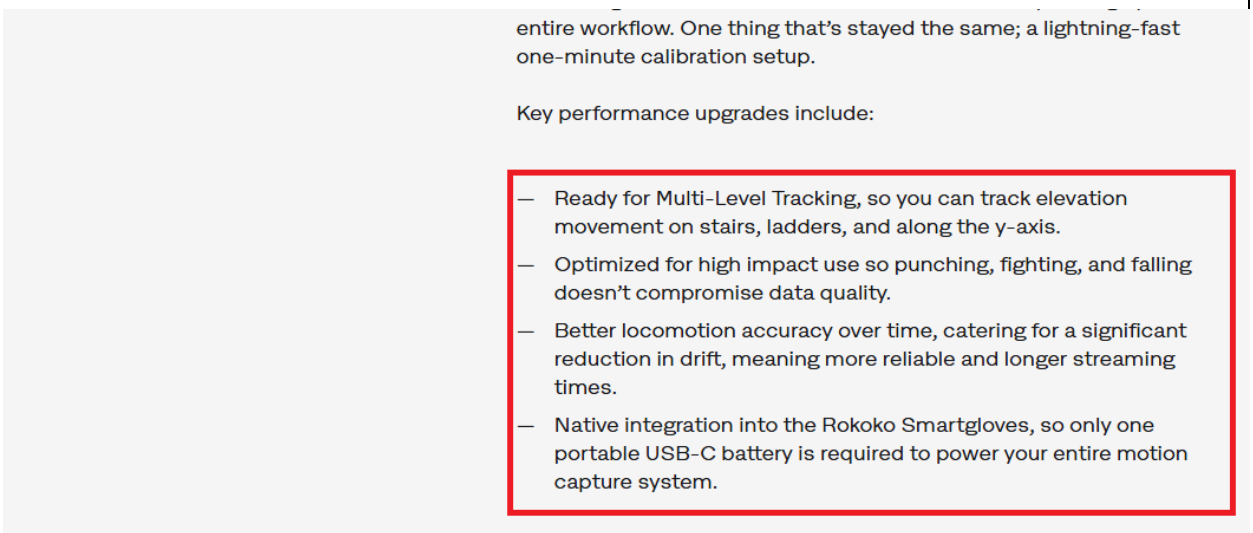


EXHIBIT 8

Rokoko Gen 1 animations were not the type of quality Defendant could resell cleanly. One year after Plaintiff purchased his equipment, Defendant released the the new Smartsuit gen 2, which produced animations at twice the frame-rate and made for commercially viable animations.





197

As the cherry on top, we've extended general performance all around. Sensors have been upgraded, bringing the maximum recorded frames per second up from 100fps to 200fps, which results in more accurate data when performing fast paced motions.

198

Improvements

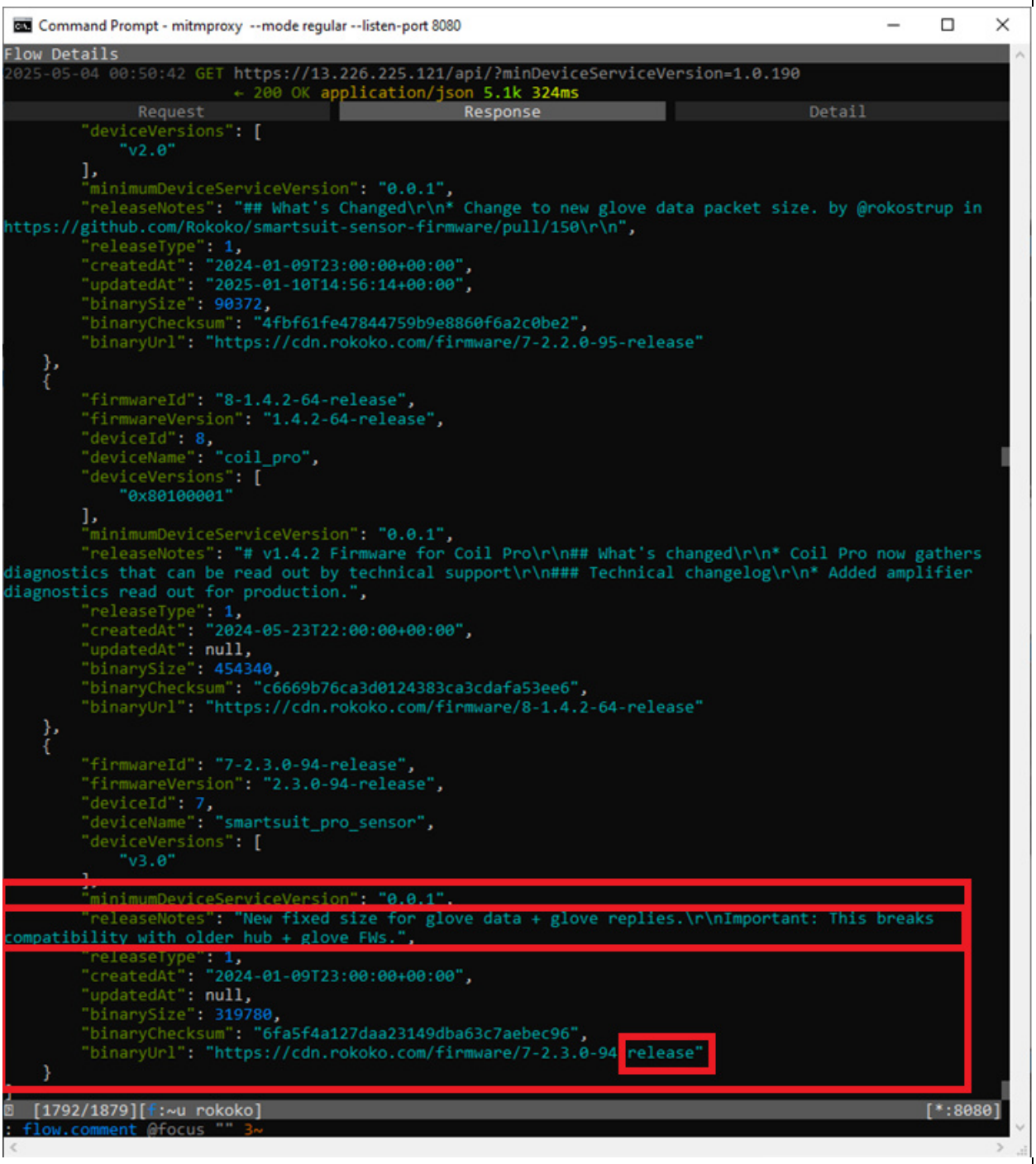
- **Better locomotion and high impact tracking** 200 FPS motion capture combined with 16 g accelerometer measurement range means that you can capture fast and high-force movements in higher quality
- **Native Smartgloves integration** Power your Smartsuit Pro II and Smartgloves with one battery
- **Better accuracy over time and less drift** Updated and more precise sensors in Smartsuit Pro II will reduce drift and enable you to capture longer takes at high quality
- **Updated LED feedback on the Smartsuit Pro II Hub**
- **Stability improvements**

199

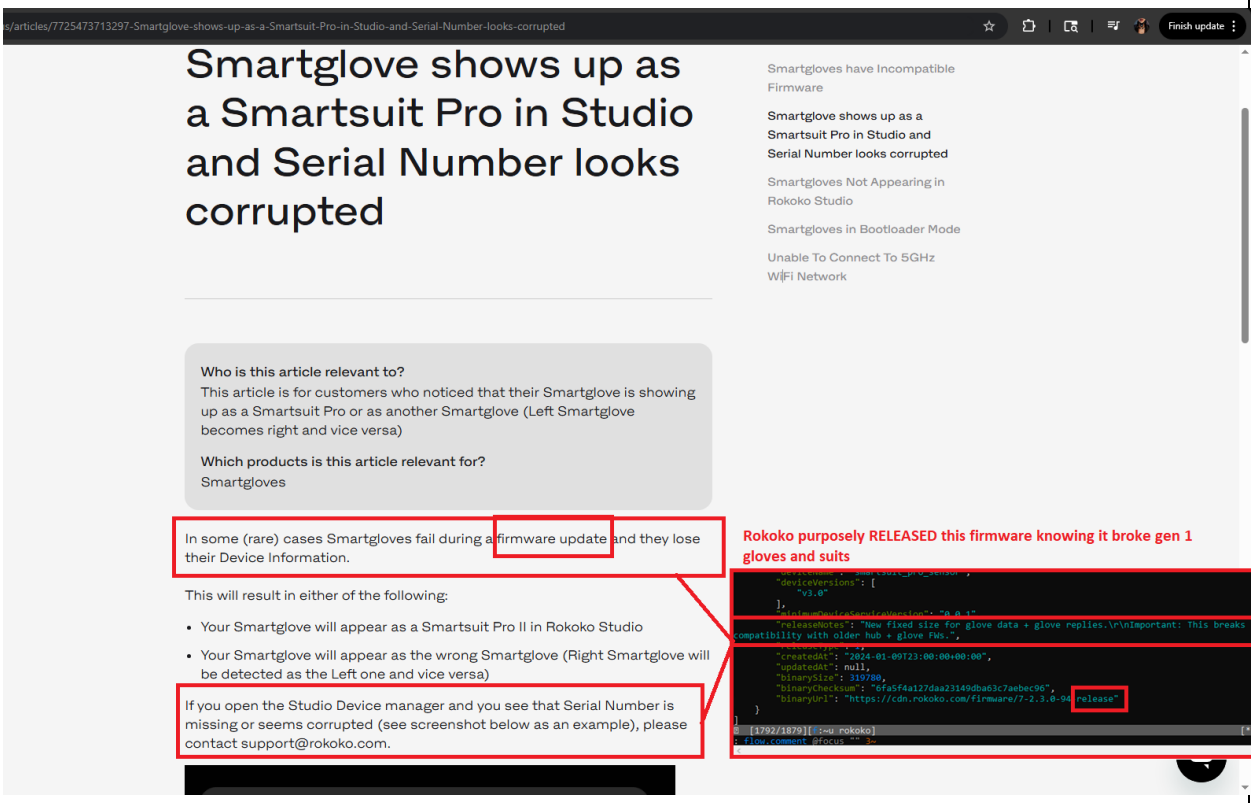
200

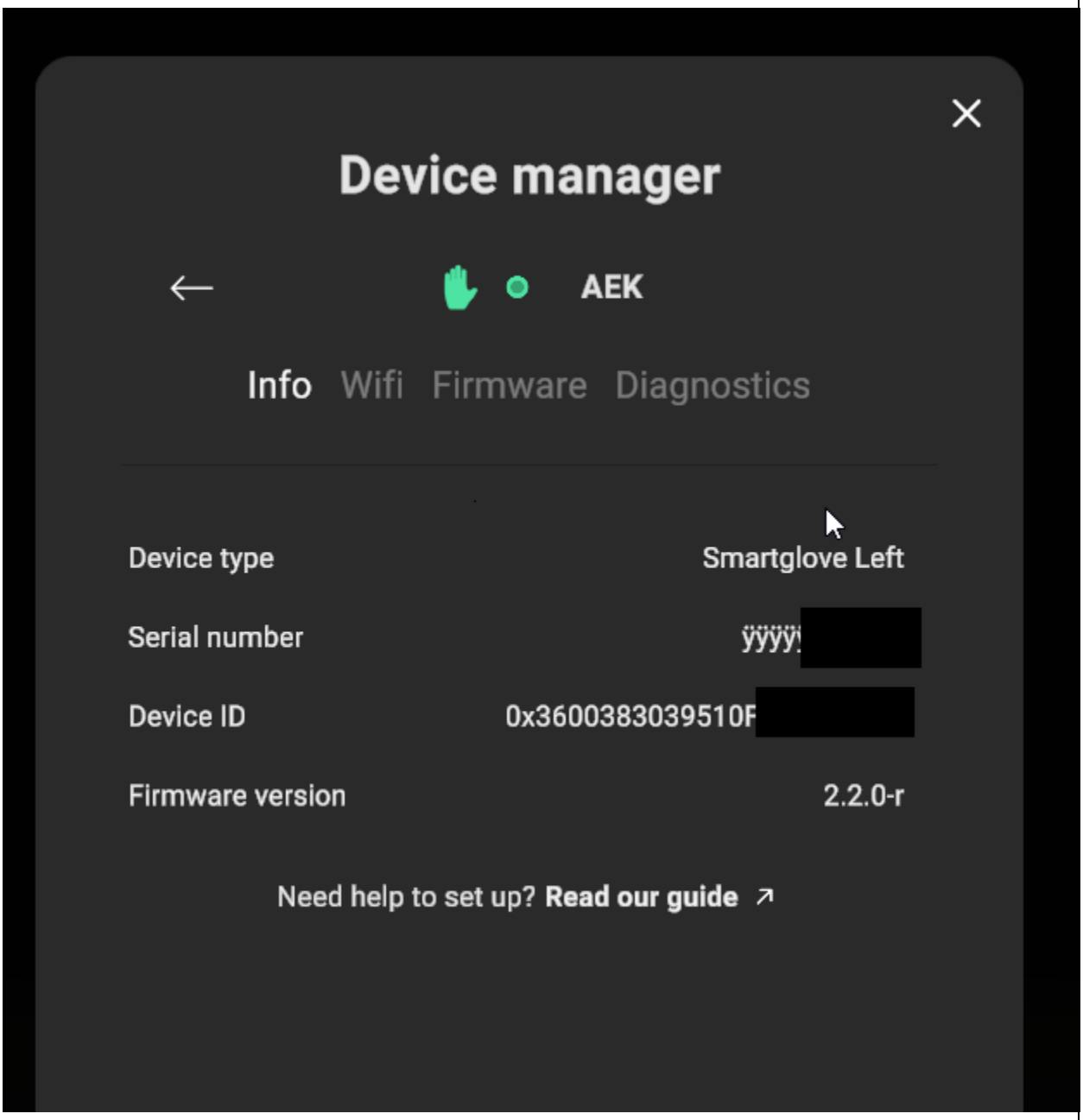
EXHIBIT 9

Defendant authored and then released an intentionally device-destroying firmware which their own developers stated in internal logs, will destroy compatibility with older gloves and suit hubs:



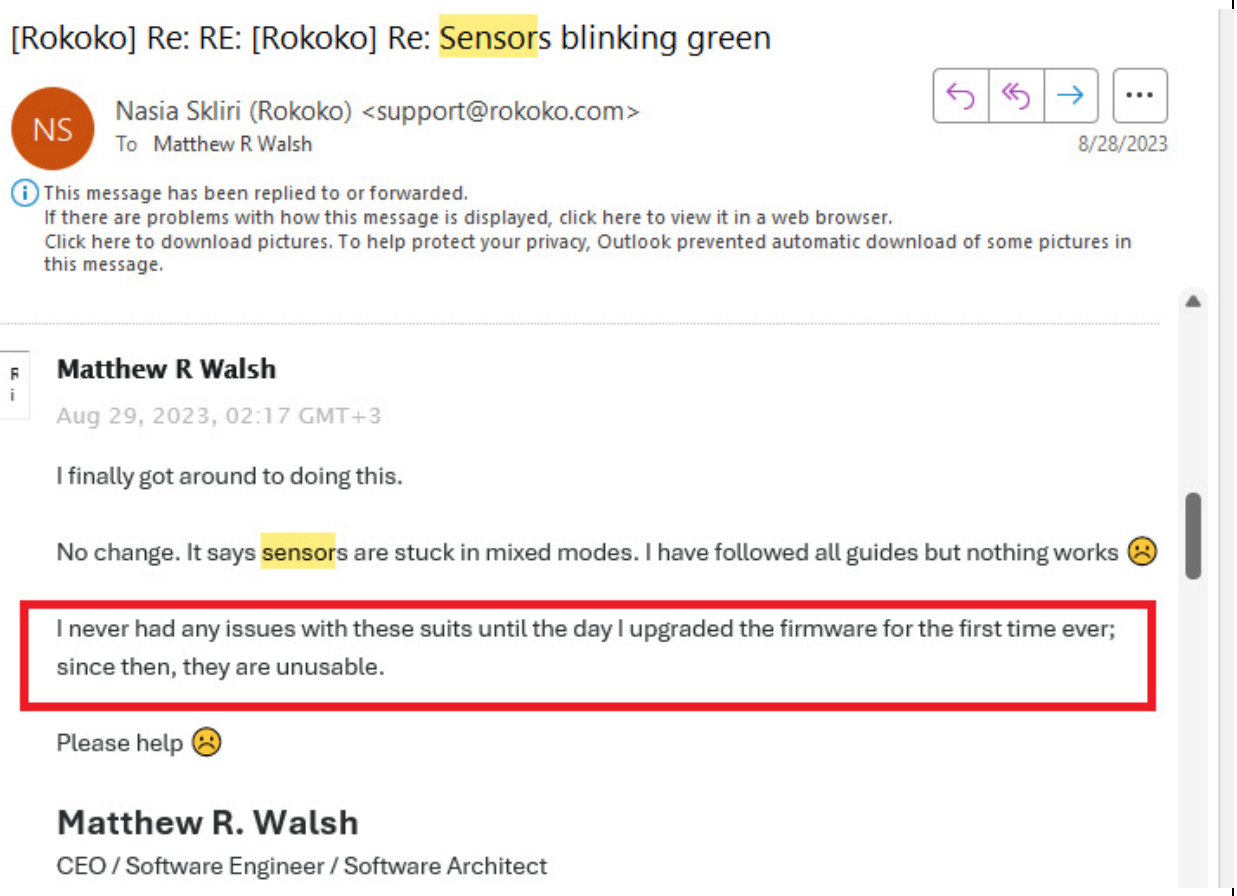
Defendant released statements on the issue and admitted the firmware is the cause, however, their developer logs show they *knew it broke the gloves and suit hubs* and *then* released it.




Device manager
AEK
Info
Wifi
Firmware
Diagnostics
Device type
Smartglove Left
Serial number
Device ID
0x36003830395 10F
Firmware version
2.2.0-r
Need help to set up? Read our guide

217

218



[Rokoko] Re: RE: [Rokoko] Re: Sensors blinking green

NS Nasia Skliri (Rokoko) <support@rokoko.com>
To Matthew R Walsh
8/28/2023

This message has been replied to or forwarded.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Matthew R Walsh
Aug 29, 2023, 02:17 GMT+3

I finally got around to doing this.

No change. It says sensors are stuck in mixed modes. I have followed all guides but nothing works ☹

I never had any issues with these suits until the day I upgraded the firmware for the first time ever; since then, they are unusable.

Please help ☹

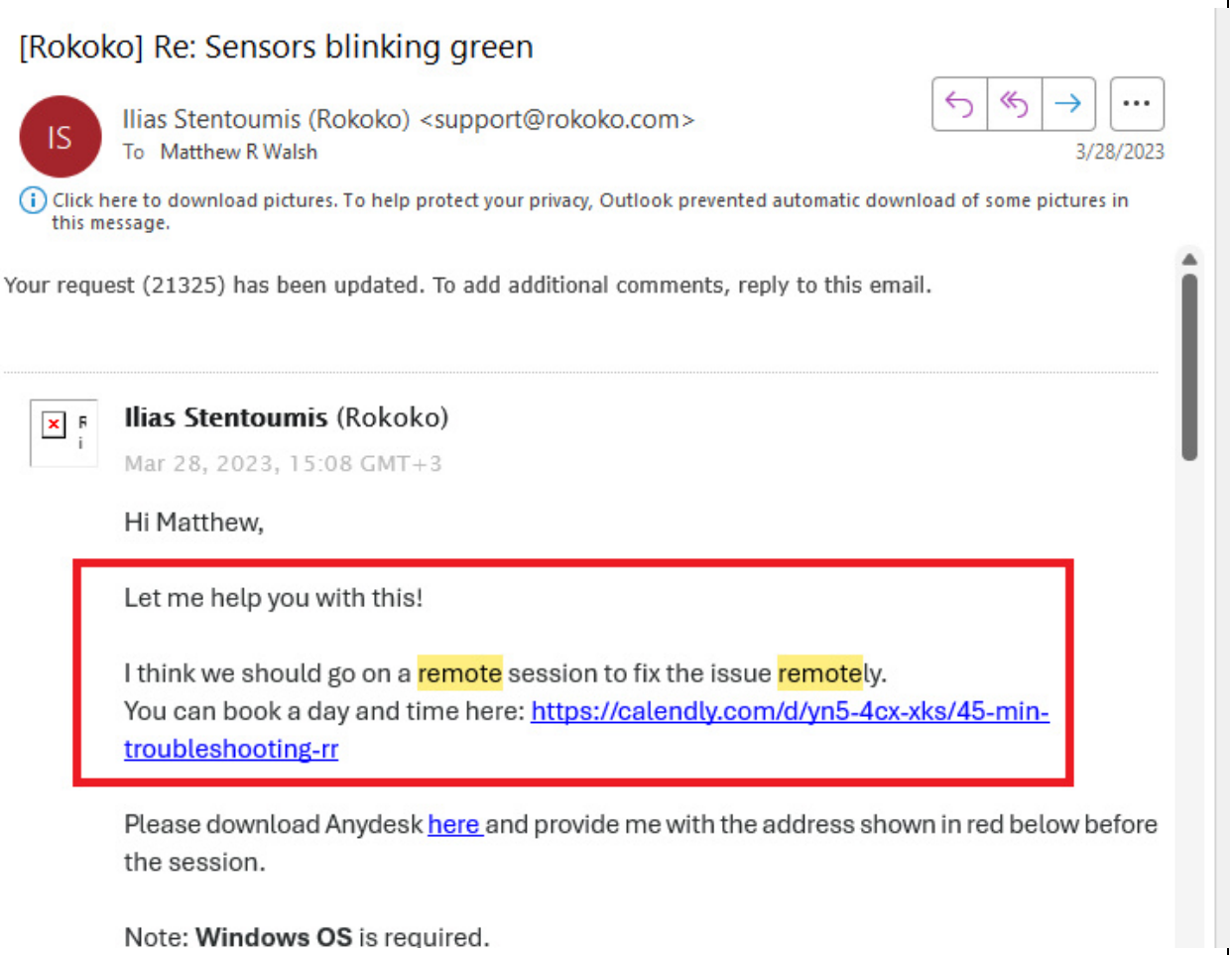
Matthew R. Walsh
CEO / Software Engineer / Software Architect

219

220

EXHIBIT 10

Unncessary remote support sessions with users and asking for logs, when they secretly were receiving live diagnostics constantly



[Rokoko] Re: Sensors blinking green

IS

Ilias Stentoumis (Rokoko) <support@rokoko.com>
To Matthew R Walsh

3/28/2023

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (21325) has been updated. To add additional comments, reply to this email.

Ilias Stentoumis (Rokoko)
Mar 28, 2023, 15:08 GMT+3

Hi Matthew,

Let me help you with this!

I think we should go on a remote session to fix the issue remotely.
You can book a day and time here: https://calendly.com/d/yn5-4cx-xks/45-min-troubleshooting-rr

Please download Anydesk here and provide me with the address shown in red below before the session.

Note: **Windows OS** is required.

RE: [Rokoko] Re: Sensors blinking green

M matthew@winteryear.com
To 'Rokoko'

8/28/2023

I finally got around to doing this.

No change. It says sensors are stuck in mixed modes. I have followed all guides but nothing works ☹

I never had any issues with these suits until the day I upgraded the firmware for the first time ever; since then, they are unusable.

Please help ☹

Matthew R. Walsh
CEO / Software Engineer / Software Architect

232

[Rokoko] Re: RE: [Rokoko] Re: Sensors blinking green

NS Nasia Skliri (Rokoko) <support@rokoko.com>
To Matthew R Walsh

8/28/2023

This message has been replied to or forwarded.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (27784) has been updated. To add additional comments, reply to this email.

Nasia Skliri (Rokoko)
Aug 29, 2023, 09:13 GMT+3

Hello Matthew,

I hope you are doing well today!
I am here for you! Let's check what the issue may be 👀

Please provide me a Hub Log, as per the instructions below:

Hub Log
Open Rokoko Studio and connect the Smartsuit to a computer with the external USB-C provided by us.

233 - Click on "Configure" on Device Manager.

234

235

EXHIBIT 11

Defendant required users to purchase “wires”, and always stating to Plaintiff and other users, that the logs say the ‘wires’ are bad… The logs and live diagnostics actually said the complete opposite:

[Rokoko] Re: Sensors blinking green

IS Ilias Stentoumis (Rokoko) <support@rokoko.com>
To Matthew R Walsh
4/12/2023

This message has been replied to or forwarded.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (21325) has been updated. To add additional comments, reply to this email.

Ilias Stentoumis (Rokoko)
Apr 12, 2023, 21:03 GMT+3

Hi Matthew,

Thank you for your patience.

Here is a link to track the delivery: https://mydhl.express.dhl/dk/en/tracking.html#/results?id=7604427213%0D%0A

Please follow the instructions in the previous response and let us know if everything is fine!
Please raise a new ticket or email us at support@rokoko.com since I will be out of the office.

Have a great evening!

RE: [Rokoko] Re: Sensors blinking green

M matthew@winteryear.com
To 'Rokoko'
8/28/2023

I finally got around to doing this.

No change. It says sensors are stuck in mixed modes. I have followed all guides but nothing works ☹

I never had any issues with these suits until the day I upgraded the firmware for the first time ever; since then, they are unusable.

Please help ☹

Matthew R. Walsh
CEO / Software Engineer / Software Architect

[Rokoko] Re: This is a follow-up to your previous request #40651 "FW: Repair" ...

DN Dan Nikolaison (Rokoko) <support@rokoko.com>
To Matthew R Walsh
4/16/2025

You replied to this message on 4/16/2025 7:08 AM.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (45999) has been updated. To add additional comments, reply to this email.

Dan Nikolaison (Rokoko)
Apr 16, 2025, 16:41 GMT+3

Hi Matthew,

The logs indicate cabling issues. I understand that you may have already replaced some cables previously, but as you have pointed out, this was two years ago. Perhaps those cables have now had extensive wear and tear, or perhaps they were not correctly connected.

If it is your preference, instead of providing you with the cables, we can arrange for your suit to be shipped back to our HQ and for our repairs coordinator to replace the cables for you (and also inspect the physical hardware to identify any other potential faults).

252

rkk_USB_Logger_29_3_2025.log - Notepad

File Edit Format View Help

```
SBRANCH: Auto-_paddr error 2
SBRANCH: Auto-_paddr error 3
SBRANCH: Auto-_paddr error 4
SBRANCH: Auto-_paddr error 5
SBRANCH: Auto-_paddr error 6
Sensors and Errors detected:

[29/3/2025 19:43:39.538939] INFO: LOG-file: Branch1 : Sensors detected 0 (errors 6)

[29/3/2025 19:43:39.539164] INFO: LOG-file: Branch3 : Sensors detected 0 (errors 6)

[29/3/2025 19:43:39.539367] INFO: LOG-file: Branch0 : Sensors detected 0 (errors 0)

[29/3/2025 19:43:39.539611] INFO: LOG-file: Branch2 : Sensors detected 0 (errors 0)

[29/3/2025 19:43:39.539794] INFO: LOG-file: Branch4 : Sensors detected 0 (errors 6)

[29/3/2025 19:43:39.539988] INFO: LOG-file: Branch addresses mapping:

[29/3/2025 19:43:39.540176] INFO: LOG-file: Branch 1: tx[0x20414704] rx[0x20413F48]

[29/3/2025 19:43:39.540358] INFO: LOG-file: Branch 3: tx[0x20414704] rx[0x20413F48]

[29/3/2025 19:43:39.540546] INFO: LOG-file: Branch 0: tx[0x20414704] rx[0x20413F48]

[29/3/2025 19:43:39.540728] INFO: LOG-file: Branch 2: tx[0x20414704] rx[0x20413F48]

[29/3/2025 19:43:39.540912] INFO: LOG-file: Branch 4: tx[0x20414704] rx[0x20413F48]

[29/3/2025 19:43:39.541095] INFO: LOG-file: Branch addresses mapping:
```

Zero sensors detected. Multiple errors

Ln 909, Col 1 100% Windows (CRLF) UTF-8

253
254

[Rokoko] Re: This is a follow-up to your previous request #40651 "FW: Repair" Answers to the belo...

DN Dan Nikolaison (Rokoko) <support@rokoko.com>
To Matthew R Walsh

Reply | Reply All | Forward | ...

Wed 4/16/2025 6:41 AM

You replied to this message on 4/16/2025 7:08 AM.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dan Nikolaison (Rokoko)
Apr 16, 2025, 16:41 GMT+3

Hi Matthew,

The logs indicate cabling issues. I understand that you may have already replaced some cables previously, but as you have pointed out, this was two years ago. Perhaps those cables have now had extensive wear and tear, or perhaps they were not correctly connected.

If it is your preference, instead of providing you with the cables, we can arrange for your suit to be shipped back to our HQ and for our repairs coordinator to replace the cables for you (and also inspect the physical hardware to identify any other potential faults).

Alternatively - though this is not something we normally offer - the $800 offer for a Smartsuit Pro II still stands. This would be a discount of just over 65%.

Please note that our offices will be closed for the Easter holidays from Thursday until Tuesday. If you could let me know which option you wish to proceed with, I will assist you from Tuesday next week.

Kind regards,

Dan Nikolaison
Customer Success Manager

rokoko.com

Follow us on:

255

RE: [Rokoko] Re: This is a follow-up to your previous request #40651 "FW: Rep...

M matthew@winteryear.com
To 'Rokoko'

4/16/2025

You replied to this message on 4/17/2025 10:15 PM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dan,

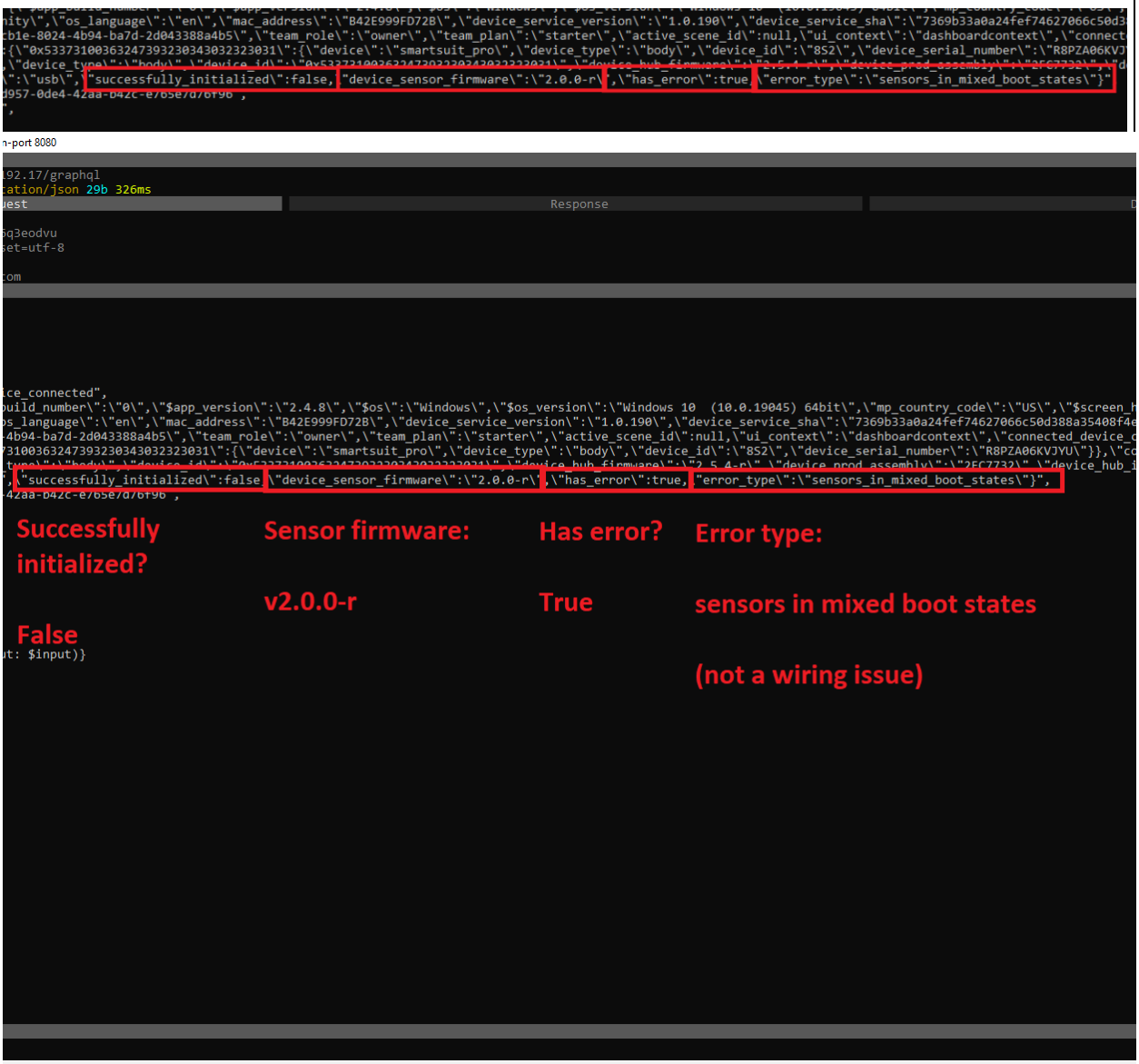
Thanks for the reply, but we've already gone in circles on the cables. The suit hasn't been operational since March 2023, and this exact issue was previously diagnosed and acknowledged. Suggesting "wear and tear" on cables that haven't been in use for over two years is dismissive and inaccurate.

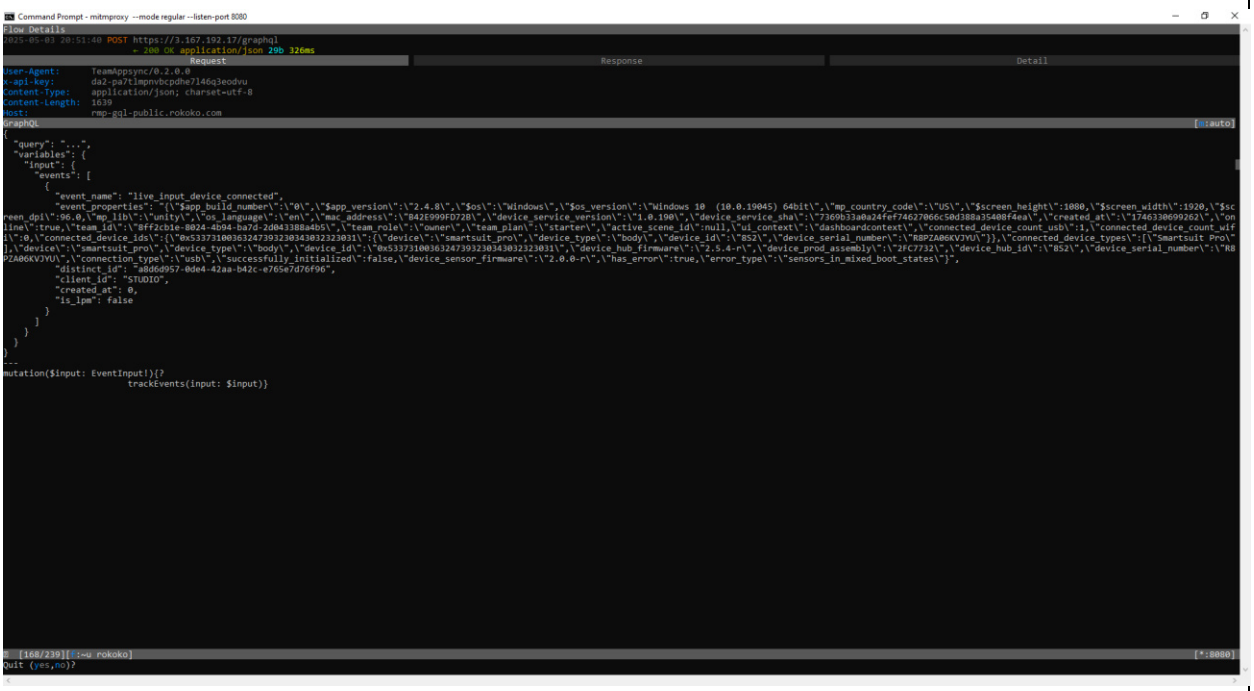
Your offer to "inspect" the suit at HQ is not acceptable. If we reach the point — again, for the second time — where it turns out the issue isn't cabling, we'll be hit with more delays because "replacement parts" like sensors or the hub aren't even in stock. That in itself is a legal failure — as stated in the legal complaint, you are required to stock serviceable parts for a reasonable duration after sale. You don't. You won't. You can't.

256
257
258

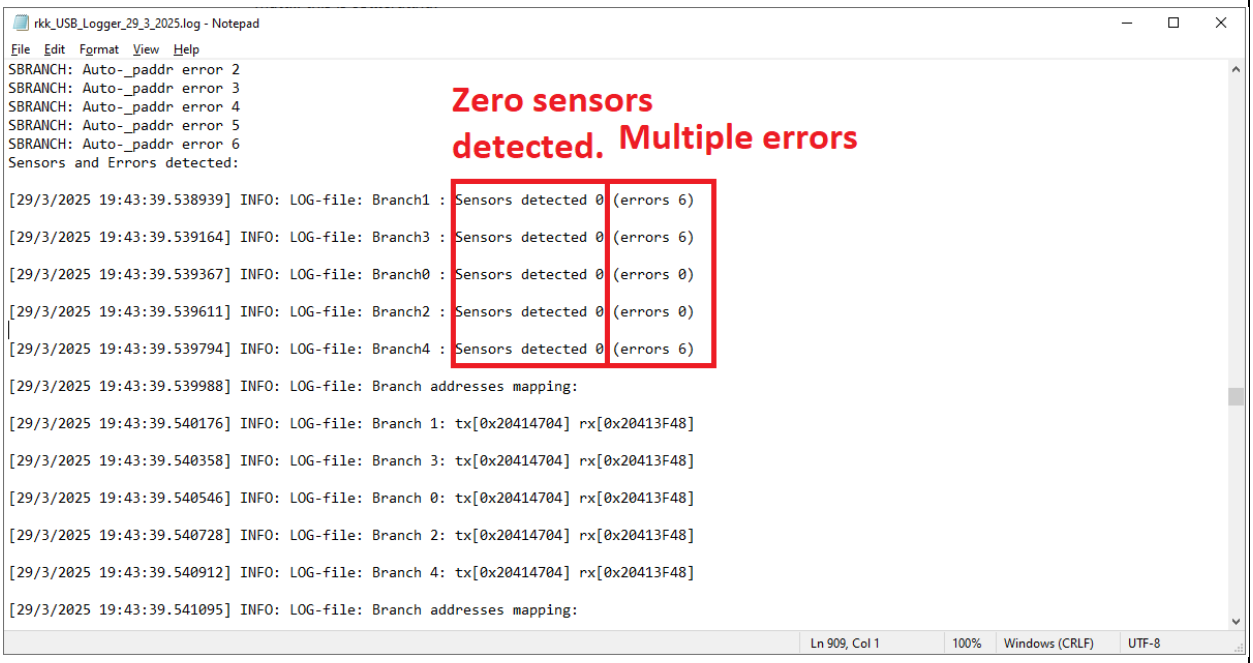
EXHIBIT 12

Defendant software sent them secret, live internal diagnostic logs which showed precisely what the issue was, as did the logs collected from Plaintiff's machine. Defendant still continually blamed "wires" as the cause to all users and acted as if they did not receive this information:




Command Prompt - mitmproxy --mode regular --listen-port 8080
Flow Details
2025-05-03 20:51:40 POST https://3.167.192.17/graphql
← 200 OK application/json 29b 326ms
Request
Response
Detail
User-Agent: TeamAppsync/0.2.0.0
x-api-key: da2-pa7timpnvbcpdhe7l46q3eodvu
Content-Type: application/json; charset=utf-8
Content-Length: 1639
Host: rmp-gql-public.rokoko.com
GraphQL
"query": "...",
"variables": {
"input": {
"events": [
{
"event_name": "live_input_device_connected",
"distinct_id": "a8d6d957-0de4-42aa-b42c-e765e7d76f96",
"client_id": "STUDIO",
"created_at": 0,
"is_lpm": false
}
]
}
}
}
---
mutation($input: EventInput!){?
trackEvents(input: $input)}
[168/239][*:-u rokoko]
[*:8080]
Quit (yes,no)?

273


rkk_USB_Logger_29_3_2025.log - Notepad
File Edit Format View Help
SBRANCH: Auto-_paddr error 2
SBRANCH: Auto-_paddr error 3
SBRANCH: Auto-_paddr error 4
SBRANCH: Auto-_paddr error 5
SBRANCH: Auto-_paddr error 6
Sensors and Errors detected:
Zero sensors detected.
Multiple errors
[29/3/2025 19:43:39.538939] INFO: LOG-file: Branch1 : Sensors detected 0 (errors 6)
[29/3/2025 19:43:39.539164] INFO: LOG-file: Branch3 : Sensors detected 0 (errors 6)
[29/3/2025 19:43:39.539367] INFO: LOG-file: Branch0 : Sensors detected 0 (errors 0)
[29/3/2025 19:43:39.539611] INFO: LOG-file: Branch2 : Sensors detected 0 (errors 0)
[29/3/2025 19:43:39.539794] INFO: LOG-file: Branch4 : Sensors detected 0 (errors 6)
[29/3/2025 19:43:39.539988] INFO: LOG-file: Branch addresses mapping:
[29/3/2025 19:43:39.540176] INFO: LOG-file: Branch 1: tx[0x20414704] rx[0x20413F48]
[29/3/2025 19:43:39.540358] INFO: LOG-file: Branch 3: tx[0x20414704] rx[0x20413F48]
[29/3/2025 19:43:39.540546] INFO: LOG-file: Branch 0: tx[0x20414704] rx[0x20413F48]
[29/3/2025 19:43:39.540728] INFO: LOG-file: Branch 2: tx[0x20414704] rx[0x20413F48]
[29/3/2025 19:43:39.540912] INFO: LOG-file: Branch 4: tx[0x20414704] rx[0x20413F48]
[29/3/2025 19:43:39.541095] INFO: LOG-file: Branch addresses mapping:
Ln 909, Col 1
100%
Windows (CRLF)
UTF-8

274

EXHIBIT 13

281 Defendant stated they could not/would not fix the sensors.

[Rokoko] Re: This is a follow-up to your previous request #40651 "FW: Repair" Answers to the belo...

DN Dan Nikolaison (Rokoko) <support@rokoko.com>
To Matthew R Walsh

Reply | Reply All | Forward | ...

Wed 4/16/2025 6:41 AM

You replied to this message on 4/16/2025 7:08 AM.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dan Nikolaison (Rokoko)
Apr 16, 2025, 16:41 GMT+3

Hi Matthew,

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If it is your preference, instead of providing you with the cables, we can arrange for your suit to be shipped back to our HQ and for our repairs coordinator to replace the cables for you (and also inspect the physical hardware to identify any other potential faults).

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Please note that our offices will be closed for the Easter holidays from Thursday until Tuesday. If you could let me know which option you wish to proceed with, I will assist you from Tuesday next week.

Kind regards,

Dan Nikolaison
Customer Success Manager

rokoko.com

282 Follow us on:

[Rokoko] Re: This is a follow-up to your previous request #40651 "FW: Repair" Answers to the belo...

DN Dan Nikolaison (Rokoko) <support@rokoko.com>
To Matthew R Walsh

Reply | Reply All | Forward | ...
Thu 11/21/2024 5:37 AM

You replied to this message on 11/21/2024 11:29 PM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dan Nikolaison (Rokoko)
Nov 21, 2024, 15:36 GMT+2

Hi Matthew,

I'm afraid we no longer produce or stock the sensors or hub for the Smartsuit Pro I.

Best regards,

Dan Nikolaison
Customer Success Manager

rokoko.com

Follow us on:
Instagram,
Twitter,
LinkedIn,
Facebook, and
TikTok.
Join our community of 3D artists, VFX experts, and game devs on Discord.

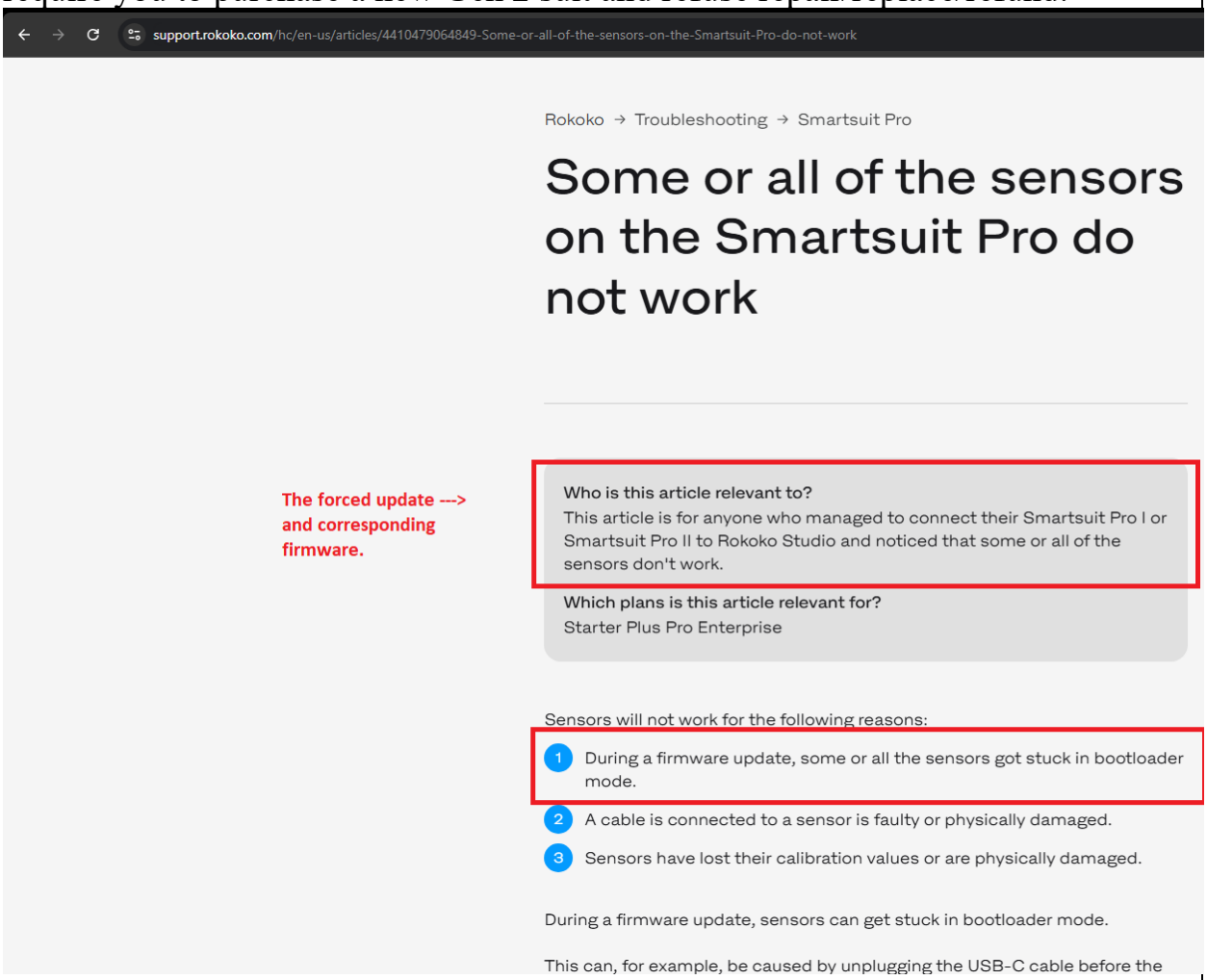
Matthew R Walsh
Nov 21, 2024, 05:16 GMT+2

I cannot buy parts either?

Dan Nikolaison (Rokoko)
Nov 20, 2024, 14:57 GMT+2

EXHIBIT 14

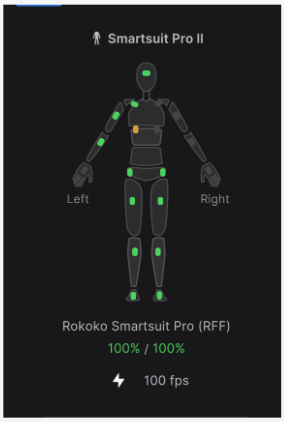
In 2025, Defendant ultimately admitted the firmware [can] destroy the sensors and only Defendant can fix them, and to reach out. When you do reach out, they simply require you to purchase a new Gen 2 suit and refuse repair/replace/refund.



support.rokoko.com/hc/en-us/articles/4410479064849-Some-or-all-of-the-sensors-on-the-Smartsuit-Pro-do-not-work

This results in not fully functioning sensors that are constantly blinking green or lighting blue (physically, not inside Rokoko Studio) and are displayed grey or white in the Rokoko Studio diagnostics panel.

Below is a screenshot example of some sensors being unresponsive:



Things to try:

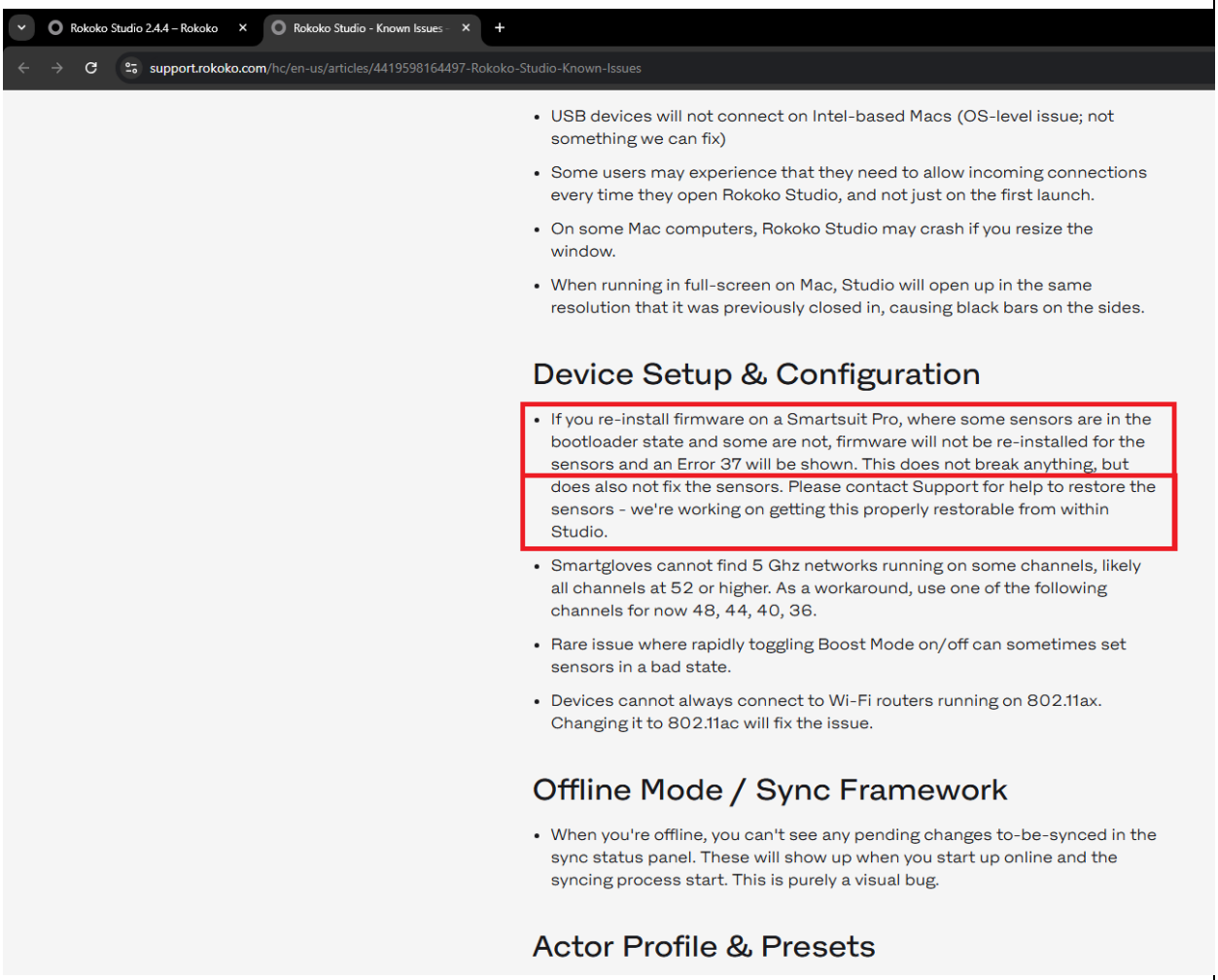
1. Perform a power cycle by unplugging and replugging the power bank from the Smartsuit Pro Hub. Please try this up to 5 times. We recommend waiting for 10 to 30 seconds before each power cycle.

Unnecessary support sessions where Rokoko requests log files, even though they secretly receive diagnostic logs through live hidden communications ---------->

2. If the above process does not fix the issue, please contact support@rokoko.com and provide the necessary log files for further inspection from our Support team as shown here.

   After you generate the logs, use this Sensor Checker Guide here to check which sensors are missing. It will indicate all the sensors that are missing. Make sure you use a valid file with only the latest entries inside the log.

297


Rokoko Studio 2.4.4 – Rokoko
Rokoko Studio - Known Issues
support.rokoko.com/hc/en-us/articles/4419598164497-Rokoko-Studio-Known-Issues
• USB devices will not connect on Intel-based Macs (OS-level issue; not something we can fix)
• Some users may experience that they need to allow incoming connections every time they open Rokoko Studio, and not just on the first launch.
• On some Mac computers, Rokoko Studio may crash if you resize the window.
• When running in full-screen on Mac, Studio will open up in the same resolution that it was previously closed in, causing black bars on the sides.
Device Setup & Configuration
• If you re-install firmware on a Smartsuit Pro, where some sensors are in the bootloader state and some are not, firmware will not be re-installed for the sensors and an Error 37 will be shown. This does not break anything, but does also not fix the sensors. Please contact Support for help to restore the sensors - we're working on getting this properly restorable from within Studio.
• Smartgloves cannot find 5 Ghz networks running on some channels, likely all channels at 52 or higher. As a workaround, use one of the following channels for now 48, 44, 40, 36.
• Rare issue where rapidly toggling Boost Mode on/off can sometimes set sensors in a bad state.
• Devices cannot always connect to Wi-Fi routers running on 802.11ax. Changing it to 802.11ac will fix the issue.
Offline Mode / Sync Framework
• When you're offline, you can't see any pending changes to-be-synced in the sync status panel. These will show up when you start up online and the syncing process start. This is purely a visual bug.
Actor Profile & Presets

298

r/Rokoko • 3y ago
Worth_Ability_3808

I Hate My Rokoko Suit

Edit: Finally got refunded August 7th. Tried 3 different methods, team seemed to be out of office pretty frequently. A ton of emails exchanged. Overall I'm just glad I didn't send in the suit to never get a refund, but it took so long that I really believed that was going to be the case for a while. Lost a couple hundred to PayPal fees.

Edit: Been waiting on a refund since May 24th when they received the suit and communicating with their team since May 9th. 😅 it's currently June 14th. I'll update when it goes through, but it's been a process. They tried to refund me a lot less than I paid so I sent them the invoice which was for around 5k. They tried saying it was for half now and half once they received the suit, but I never got half of the refund. I'm bummed it's taking so long tbh, but I'm hopeful.

Original post: This thing is a trouble shooting nightmare and it's probably the worst money I've spent in my life. I've tested it 3 times and had issues troubleshooting every time, but figured it was something I could fix on my end. Until today when 75% of my censors just stopped working. I found it was a hardware issue. I literally haven't gotten anything usable out of this suit.

This thing has only brought me stress and I may as well have animated from scratch or used something like move ai. It works worse than your free ai mocap tool. I'm just devastated and I wish I could get my money back but according to the refund policy I can't since it's been over 30 days (Really, not even 90?).

Your customer service you have to pay extra money just to talk to a person on the phone 'for a limited time'. I can see why because I'm sure you have a ton of people disappointed in this product. Also doesn't track well with magnets or too much metal in the room? Come on. 😭

I couldn't even imagine selling this thing to someone with a good conscience. To be fair I actually like the gloves (except they stop working for me if I put anything metal in my hand like an iPhone) but that's sadly the only good thing I can say about it. Don't waste your money on this thing, I wish I did more research on it. If I knew I was paying 5k for a panic attack I would've just not.

You need a dedicated router, a recommended power supply, and if you're using a third party software any plugins you need may cost extra money. For example character creator live link costs $600 on top of the thousands you may spend on the suit. Then to do livestream data you need to pay for a monthly subscription on top of it all. My sleep paralysis demon wears a rokoko suit.

Locked post. New comments cannot be posted.

299

EXHIBIT 15

306 Hollywood release event for Plaintiff's game. August 2025.

307

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309 The theatre rented for the event:

310

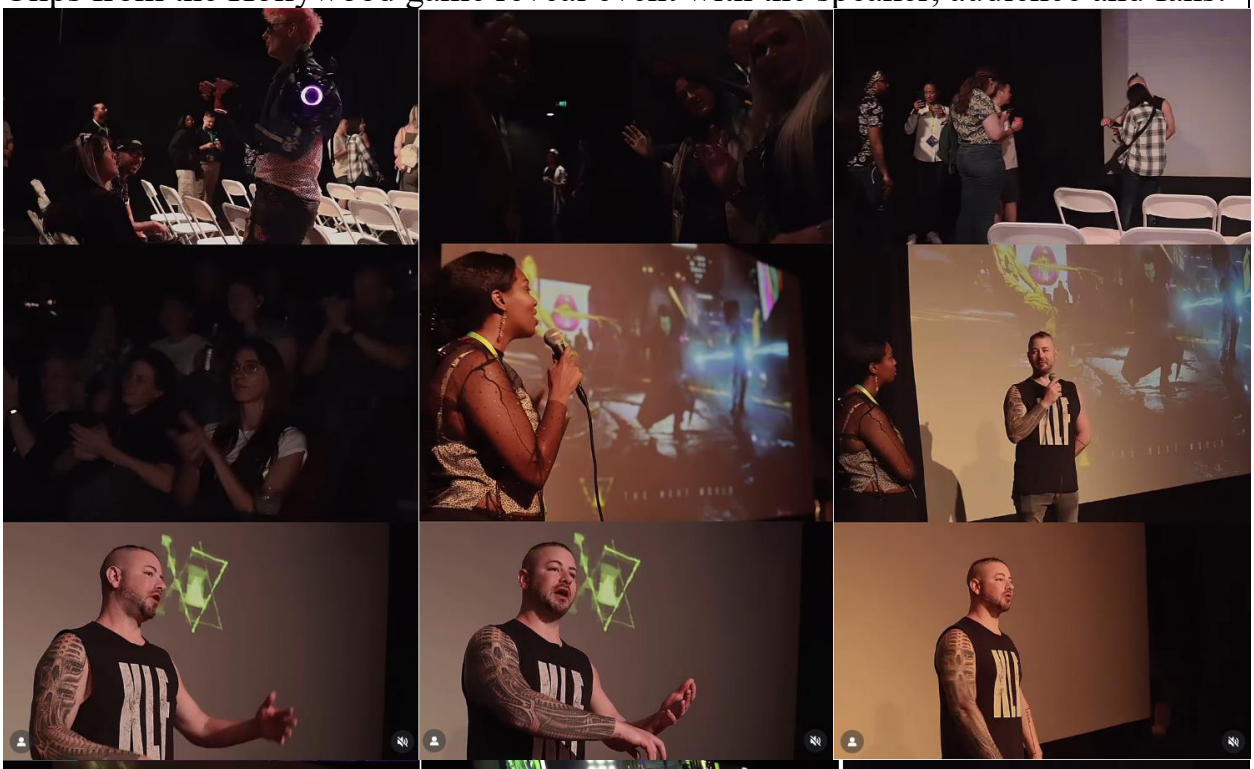
Plaintiff with fans who dressed in costume for his game release:

318 Various passes:

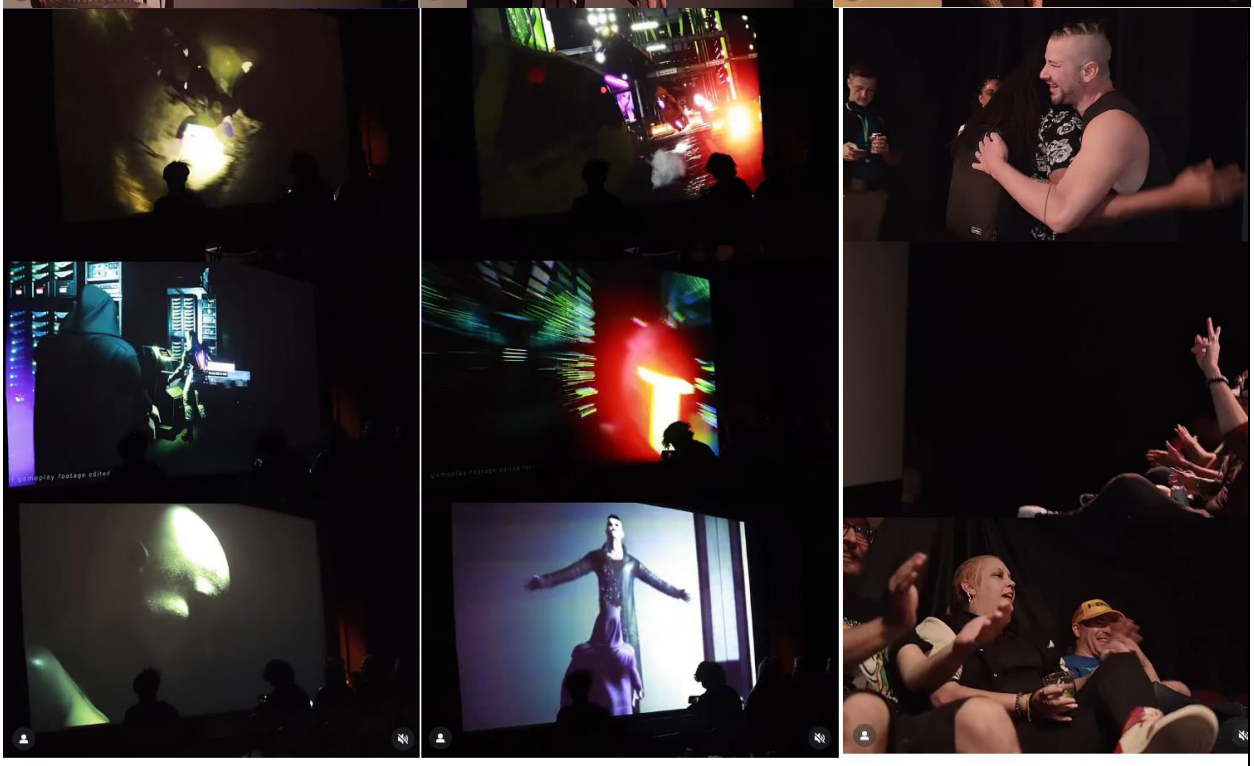
319

320

321 Clips from the Hollywood game reveal event with the speaker, audience and fans:



322



323
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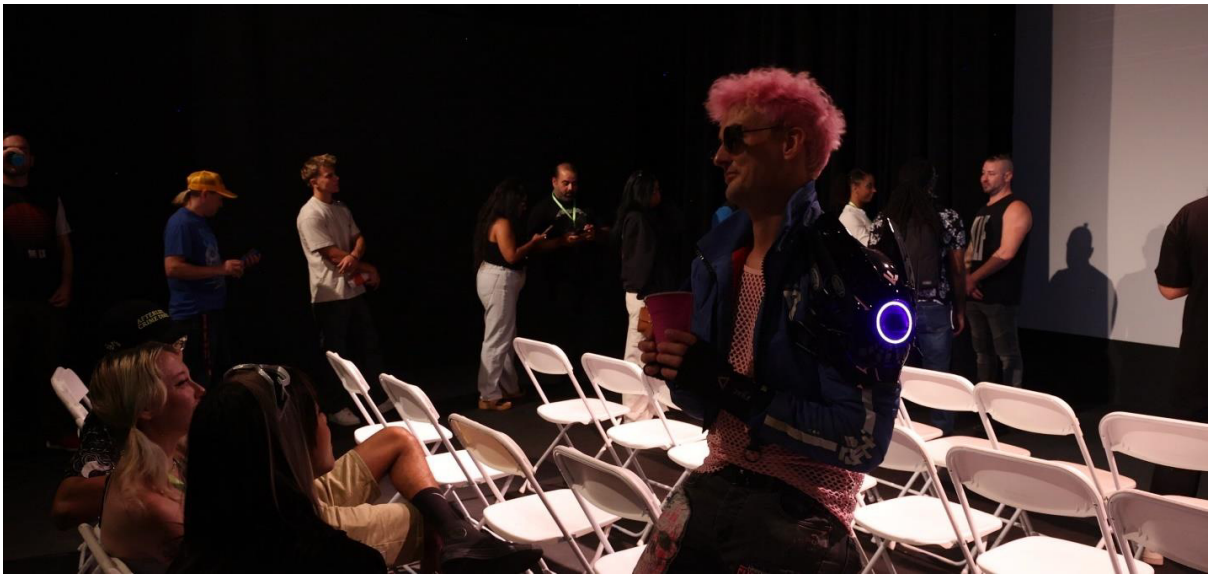
327 Fans hugging Plaintiff after the showing:

328

329 Fans lined up to speak to Plaintiff for an hour after



330

331

332 The theatre was packed early with several celebrities in frame:

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334

EXHIBIT 16

341 Cast and crew was laid off once the equipment was destroyed.

342
343

EXHIBIT 17

Plaintiff's alpha-reveal trailer received the very difficult to procure IGN® press release.

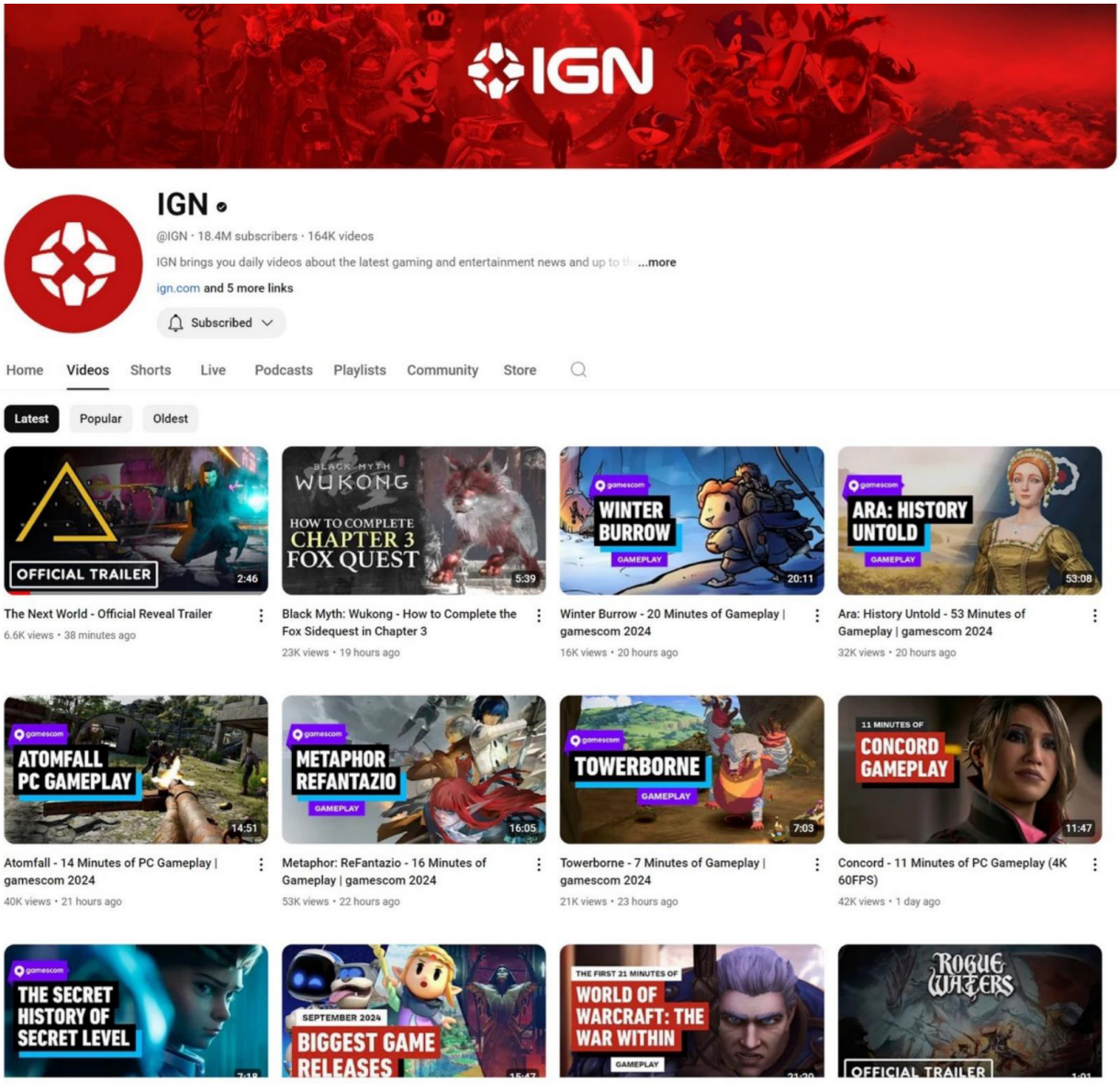
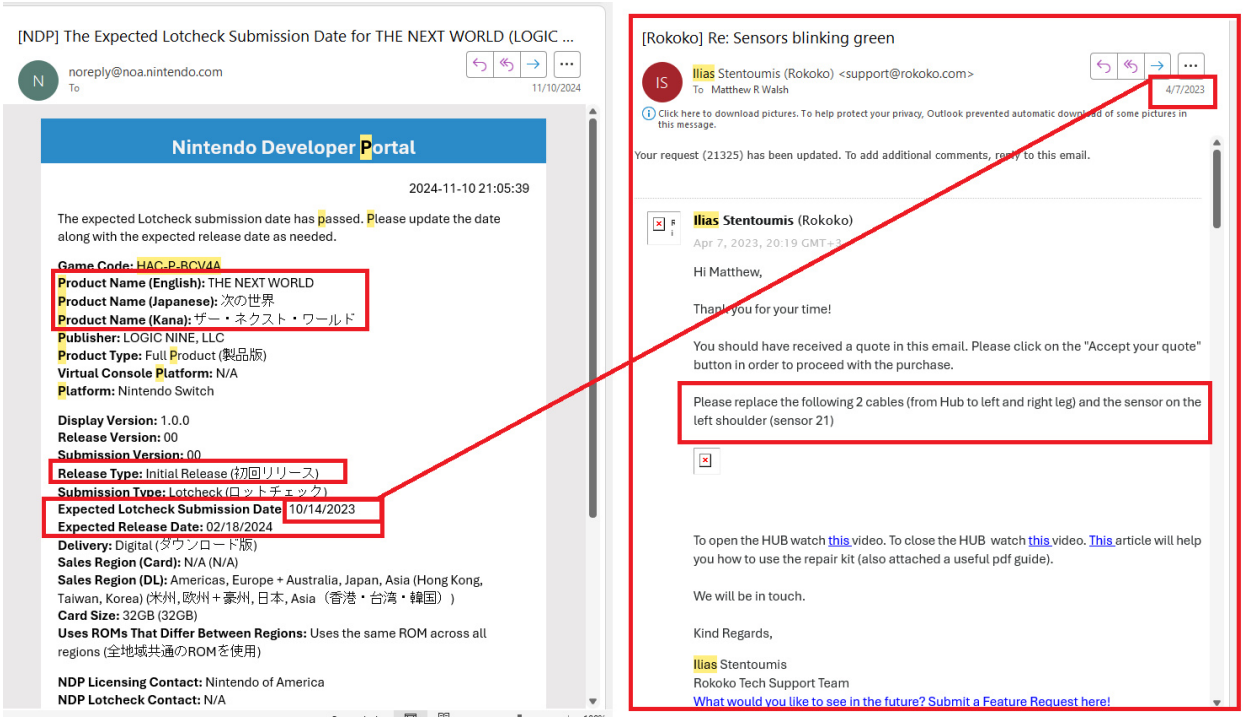


EXHIBIT 18

Release windows missed because the sensors were destroyed by Defendant's firmware and they continually just blamed "wires" while always knowing it was the sensors.



[NDP] The Expected Lotcheck Submission Date for THE NEXT WORLD (LOGIC ...

noreply@noa.nintendo.com
To
11/10/2024

Nintendo Developer Portal

2024-11-10 21:05:39

The expected Lotcheck submission date has passed. Please update the date along with the expected release date as needed.

Game Code: HAC-P-BCV4A
Product Name (English): THE NEXT WORLD
Product Name (Japanese): 次の世界
Product Name (Kana): ザー・ネクスト・ワールド
Publisher: LOGIC NINE, LLC
Product Type: Full Product (製品版)
Virtual Console Platform: N/A
Platform: Nintendo Switch

Display Version: 1.0.0
Release Version: 00
Submission Version: 00
Release Type: Initial Release (初回リリース)
Submission Type: Lotcheck (ロットチェック)
Expected Lotcheck Submission Date: 10/14/2023
Expected Release Date: 02/18/2024
Delivery: Digital (ダウンロード版)
Sales Region (Card): N/A (N/A)
Sales Region (DL): Americas, Europe + Australia, Japan, Asia (Hong Kong, Taiwan, Korea) (米州, 欧州＋豪州, 日本, Asia（香港・台湾・韓国）)
Card Size: 32GB (32GB)
Uses ROMs That Differ Between Regions: Uses the same ROM across all regions (全地域共通のROMを使用)

NDP Licensing Contact: Nintendo of America
NDP Lotcheck Contact: N/A

[Rokoko] Re: Sensors blinking green

Ilias Stentoumis (Rokoko) <support@rokoko.com>
To Matthew R Walsh
4/7/2023

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (21325) has been updated. To add additional comments, reply to this email.

Ilias Stentoumis (Rokoko)
Apr 7, 2023, 20:19 GMT+3

Hi Matthew,

Thank you for your time!

You should have received a quote in this email. Please click on the "Accept your quote" button in order to proceed with the purchase.

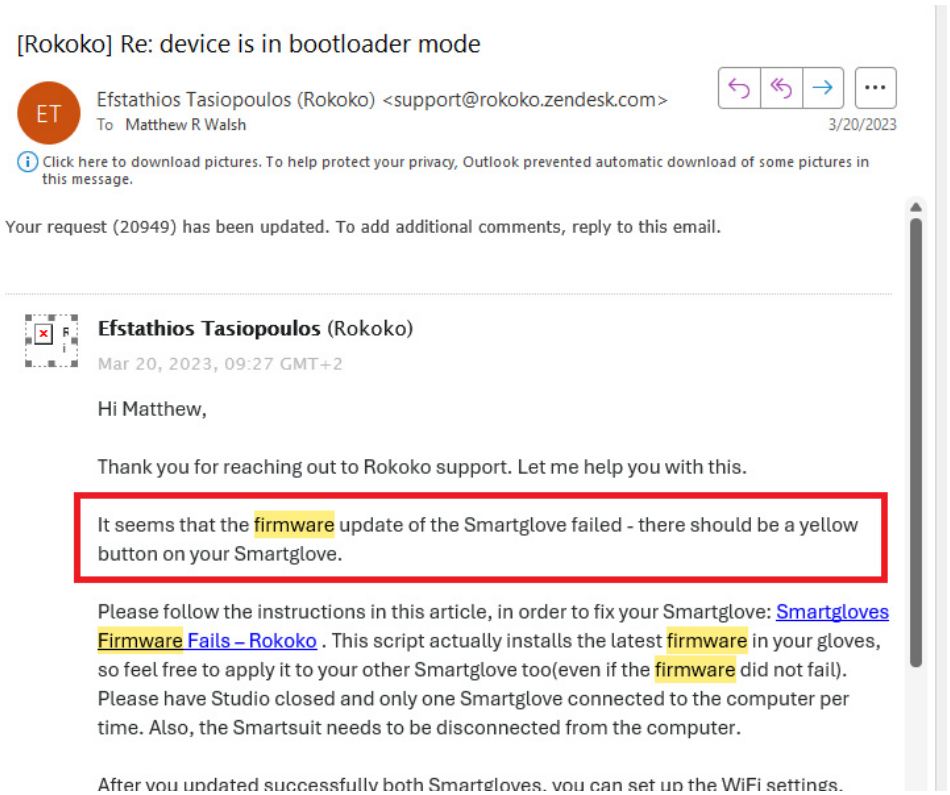
Please replace the following 2 cables (from Hub to left and right leg) and the sensor on the left shoulder (sensor 21)

To open the HUB watch this video. To close the HUB watch this video. This article will help you how to use the repair kit (also attached a useful pdf guide).

We will be in touch.

Kind Regards,

Ilias Stentoumis
Rokoko Tech Support Team
What would you like to see in the future? Submit a Feature Request here!



[Rokoko] Re: device is in bootloader mode

ET Efstathios Tasiopoulos (Rokoko) <support@rokoko.zendesk.com>
To Matthew R Walsh 3/20/2023

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (20949) has been updated. To add additional comments, reply to this email.

Efstathios Tasiopoulos (Rokoko)
Mar 20, 2023, 09:27 GMT+2

Hi Matthew,

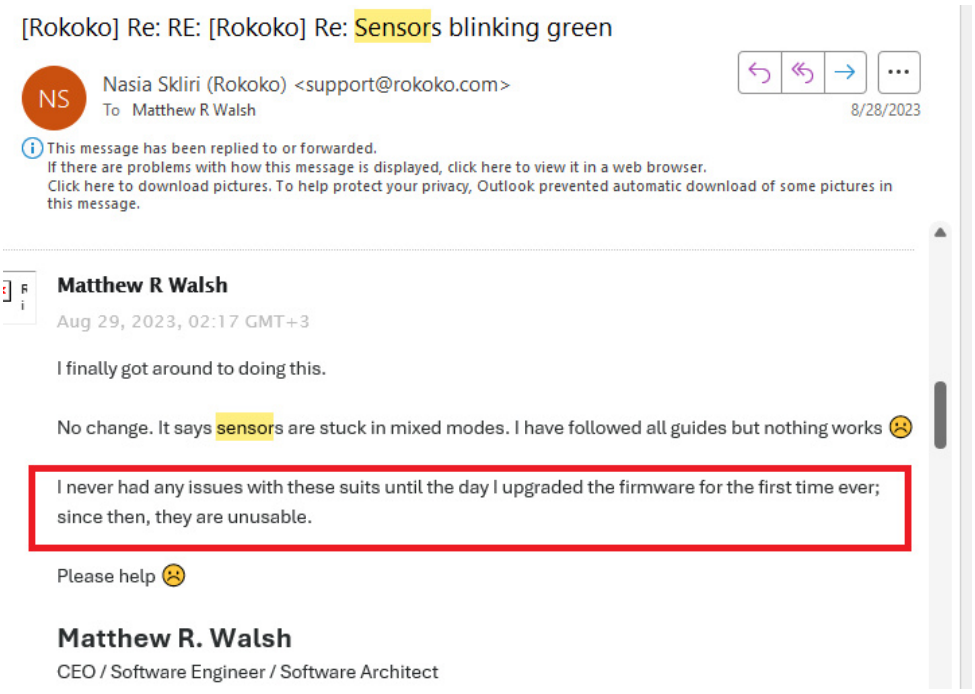
Thank you for reaching out to Rokoko support. Let me help you with this.

It seems that the firmware update of the Smartglove failed - there should be a yellow button on your Smartglove.

Please follow the instructions in this article, in order to fix your Smartglove: Smartgloves Firmware Fails – Rokoko . This script actually installs the latest firmware in your gloves, so feel free to apply it to your other Smartglove too(even if the firmware did not fail). Please have Studio closed and only one Smartglove connected to the computer per time. Also, the Smartsuit needs to be disconnected from the computer.

After you updated successfully both Smartgloves, you can set up the WiFi settings.

364



[Rokoko] Re: RE: [Rokoko] Re: Sensors blinking green

NS Nasia Skliri (Rokoko) <support@rokoko.com>
To Matthew R Walsh 8/28/2023

This message has been replied to or forwarded.
If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Matthew R Walsh
Aug 29, 2023, 02:17 GMT+3

I finally got around to doing this.

No change. It says sensors are stuck in mixed modes. I have followed all guides but nothing works ☹

I never had any issues with these suits until the day I upgraded the firmware for the first time ever; since then, they are unusable.

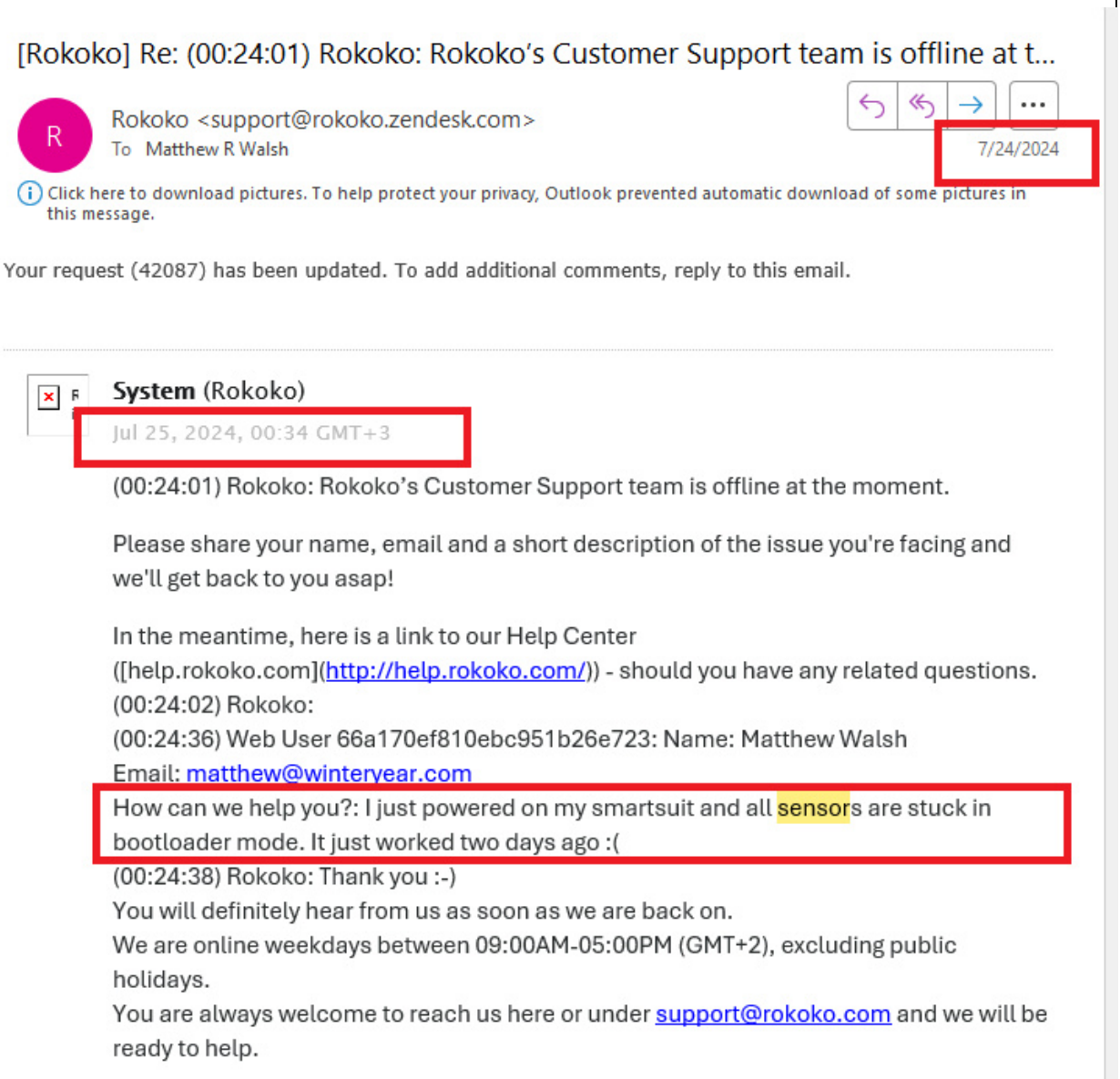
Please help ☹

Matthew R. Walsh
CEO / Software Engineer / Software Architect

365

366

Plaintiff reset the firmware using Rokoko's own internal tools he procured after 2023 and had them working for a time, until the next firmware update fully destroyed the suits:



[Rokoko] Re: (00:24:01) Rokoko: Rokoko's Customer Support team is offline at t...

R Rokoko <support@rokoko.zendesk.com>
To Matthew R Walsh
7/24/2024

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Your request (42087) has been updated. To add additional comments, reply to this email.

System (Rokoko)
Jul 25, 2024, 00:34 GMT+3

(00:24:01) Rokoko: Rokoko's Customer Support team is offline at the moment.

Please share your name, email and a short description of the issue you're facing and we'll get back to you asap!

In the meantime, here is a link to our Help Center (help.rokoko.com) - should you have any related questions.
(00:24:02) Rokoko:
(00:24:36) Web User 66a170ef810ebc951b26e723: Name: Matthew Walsh
Email: matthew@winteryear.com
How can we help you?: I just powered on my smartsuit and all sensors are stuck in bootloader mode. It just worked two days ago :(
(00:24:38) Rokoko: Thank you :-)
You will definitely hear from us as soon as we are back on.
We are online weekdays between 09:00AM-05:00PM (GMT+2), excluding public holidays.
You are always welcome to reach us here or under support@rokoko.com and we will be ready to help.

EXHIBIT 19

377 Sony suspended Plaintiff's developer account

PlayStation Partners Suspension

PP PlayStation Partners <no-reply@signin.playstation.net>
To matthew@winteryear.com 5/1/2024

PlayStation Partners

PlayStation Partners Account Suspended

Hello Matthew,
Your PlayStation® Partners account has been suspended due to inactivity.

If you'd like your account to be un-suspended, please contact us now.

This message is automatically generated. Please do not reply as this mailbox is not monitored.

Best regards,

© 2019 Sony Interactive Entertainment.

This email and any attachments are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please contact us and delete this email and any attachments from your system.

378
379

EXHIBIT 20

Switch 2 is out, PS6 coming, etc. All Plaintiff's work is now obsolete and must be retooled/rewrote/redone.

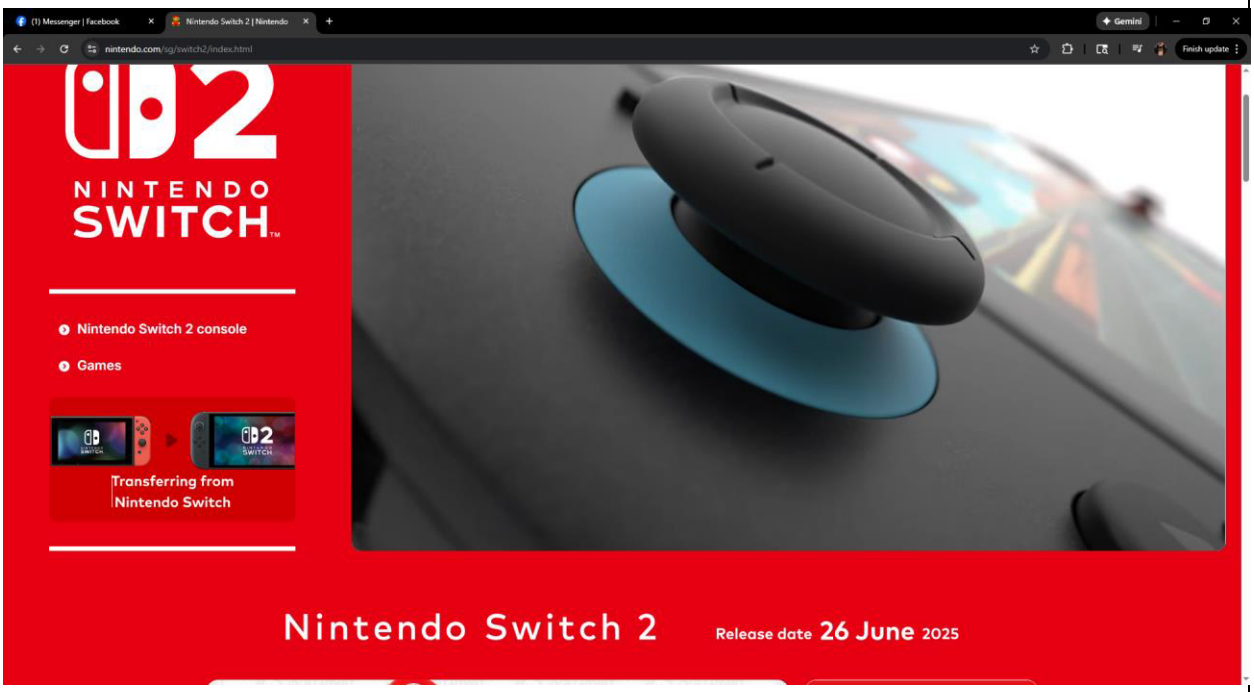
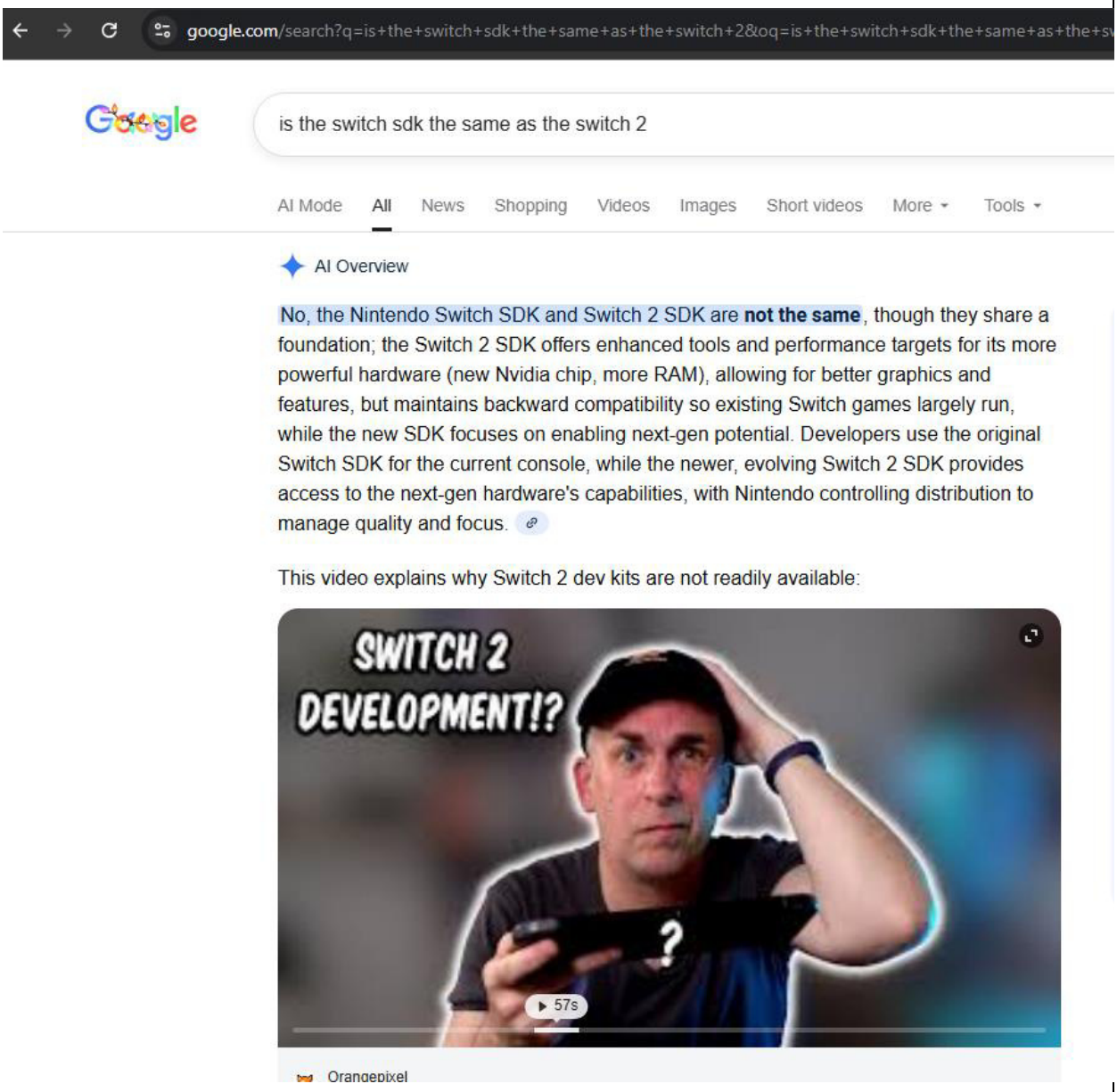


EXHIBIT 21

395 Re-tooling and re-development required to match new SDK and hardware specs.
396



397

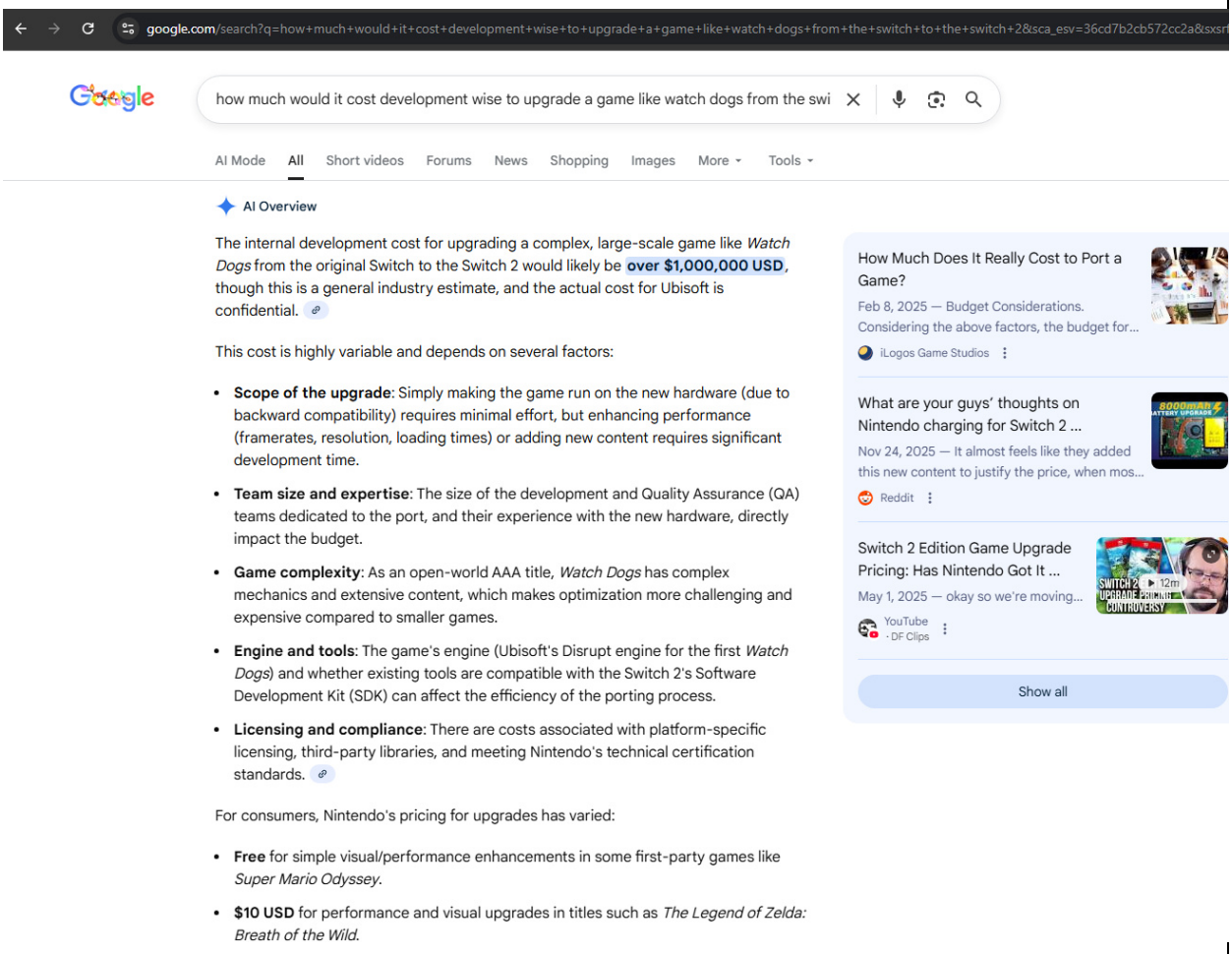

google.com/search?q=how+much+would+it+cost+development+wise+to+upgrade+a+game+like+watch+dogs+from+the+switch+to+the+switch+2&sca_esv=36cd7b2cb572cc2a&sxsr
how much would it cost development wise to upgrade a game like watch dogs from the swi
AI Mode
All
Short videos
Forums
News
Shopping
Images
More
Tools
AI Overview
The internal development cost for upgrading a complex, large-scale game like Watch Dogs from the original Switch to the Switch 2 would likely be over $1,000,000 USD, though this is a general industry estimate, and the actual cost for Ubisoft is confidential.
This cost is highly variable and depends on several factors:
Scope of the upgrade: Simply making the game run on the new hardware (due to backward compatibility) requires minimal effort, but enhancing performance (framerates, resolution, loading times) or adding new content requires significant development time.
Team size and expertise: The size of the development and Quality Assurance (QA) teams dedicated to the port, and their experience with the new hardware, directly impact the budget.
Game complexity: As an open-world AAA title, Watch Dogs has complex mechanics and extensive content, which makes optimization more challenging and expensive compared to smaller games.
Engine and tools: The game's engine (Ubisoft's Disrupt engine for the first Watch Dogs) and whether existing tools are compatible with the Switch 2's Software Development Kit (SDK) can affect the efficiency of the porting process.
Licensing and compliance: There are costs associated with platform-specific licensing, third-party libraries, and meeting Nintendo's technical certification standards.
For consumers, Nintendo's pricing for upgrades has varied:
Free for simple visual/performance enhancements in some first-party games like Super Mario Odyssey.
$10 USD for performance and visual upgrades in titles such as The Legend of Zelda: Breath of the Wild.
How Much Does It Really Cost to Port a Game?
Feb 8, 2025 — Budget Considerations. Considering the above factors, the budget for...
iLogos Game Studios
What are your guys' thoughts on Nintendo charging for Switch 2 ...
Nov 24, 2025 — It almost feels like they added this new content to justify the price, when mos...
Reddit
Switch 2 Edition Game Upgrade Pricing: Has Nintendo Got It ...
May 1, 2025 — okay so we're moving...
YouTube · DF Clips
12m
Show all

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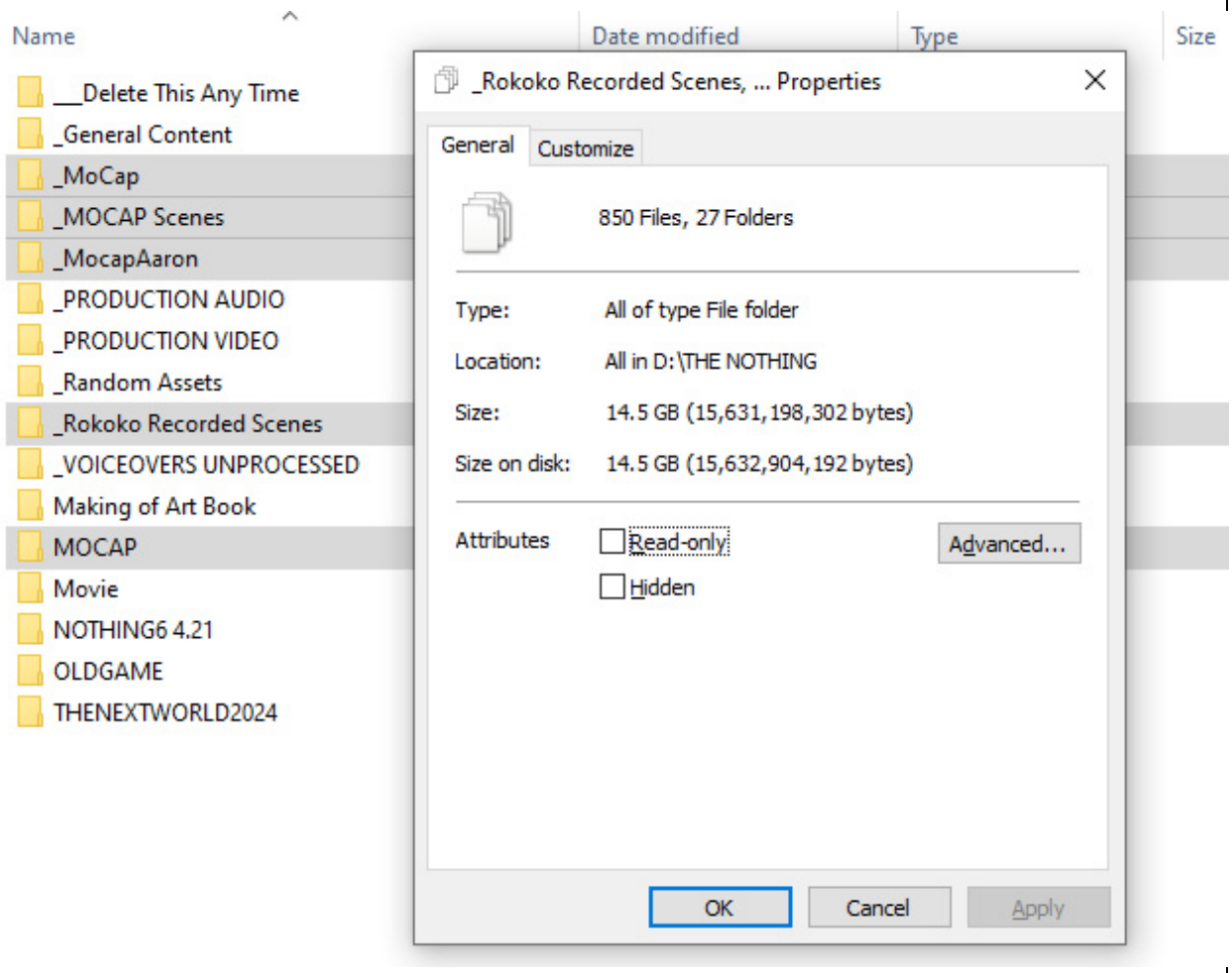
EXHIBIT 22

Approx. 850 raw, unsplit, unprocessed animations



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handgun_nose_attack_forward_MIXAMO_dresden.FBX
handgun_nose_attack_forward_MIXAMO_npc.FBX
handgun_nose_smash_MIXAMO_dresden.FBX
handgun_nose_smash_MIXAMO_npc.FBX
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in_cover_wrist_knife_disarm_MIXAMO_npc.FBX
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shoulder_tappy_pipe_hit_MIXAMO_npc.FBX
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sniper_rear_disarm_no_weapon_MIXAMO_npc.FBX
sniper_rifle_attack_no_weapon_nosr_attack_MIXAMO_dresden.FBX
sniper_rifle_attack_no_weapon_nosr_attack_MIXAMO_npc.FBX
sniper_rifle_back_of_the_head_smack_MIXAMO_dresden.FBX

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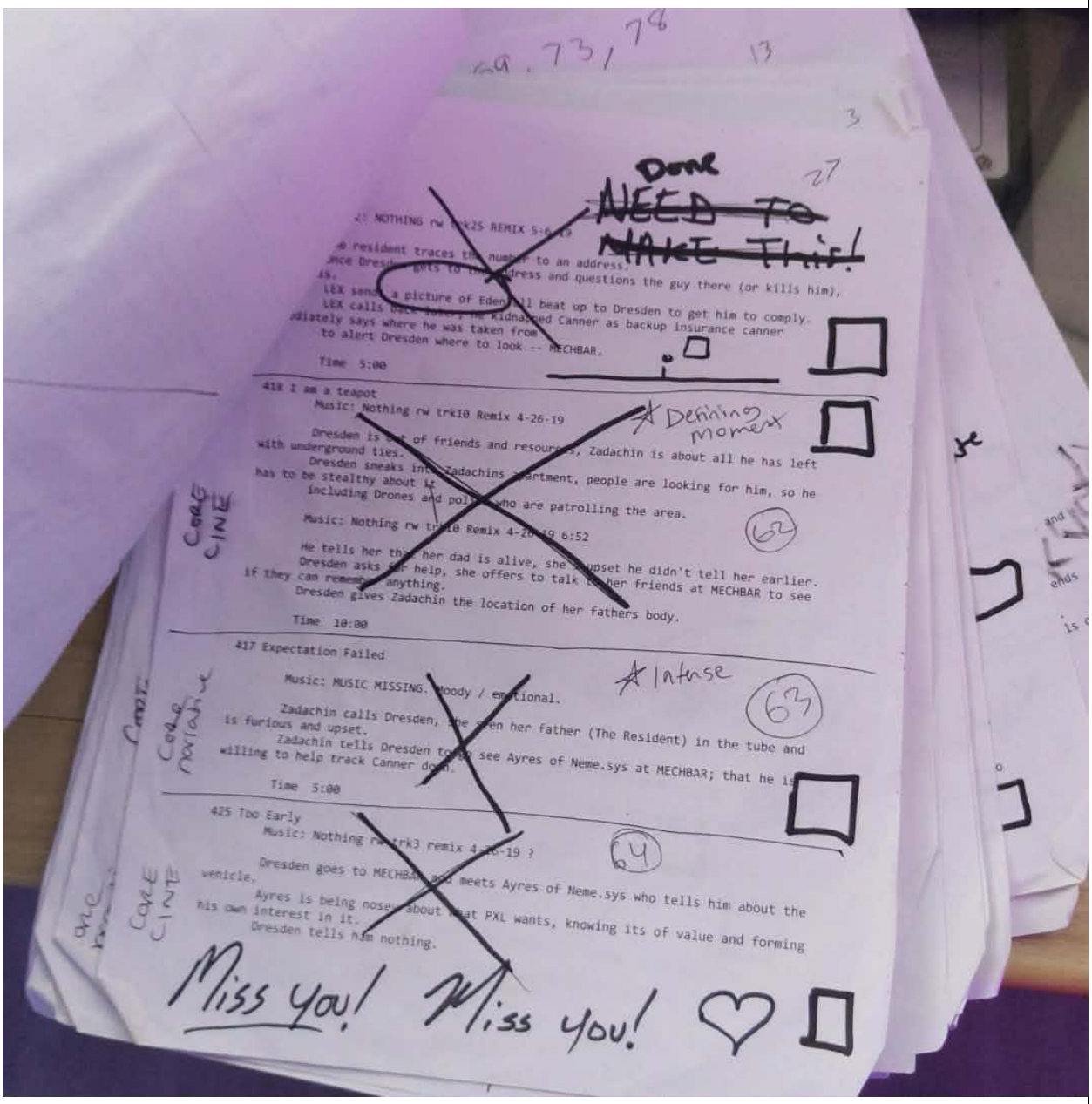
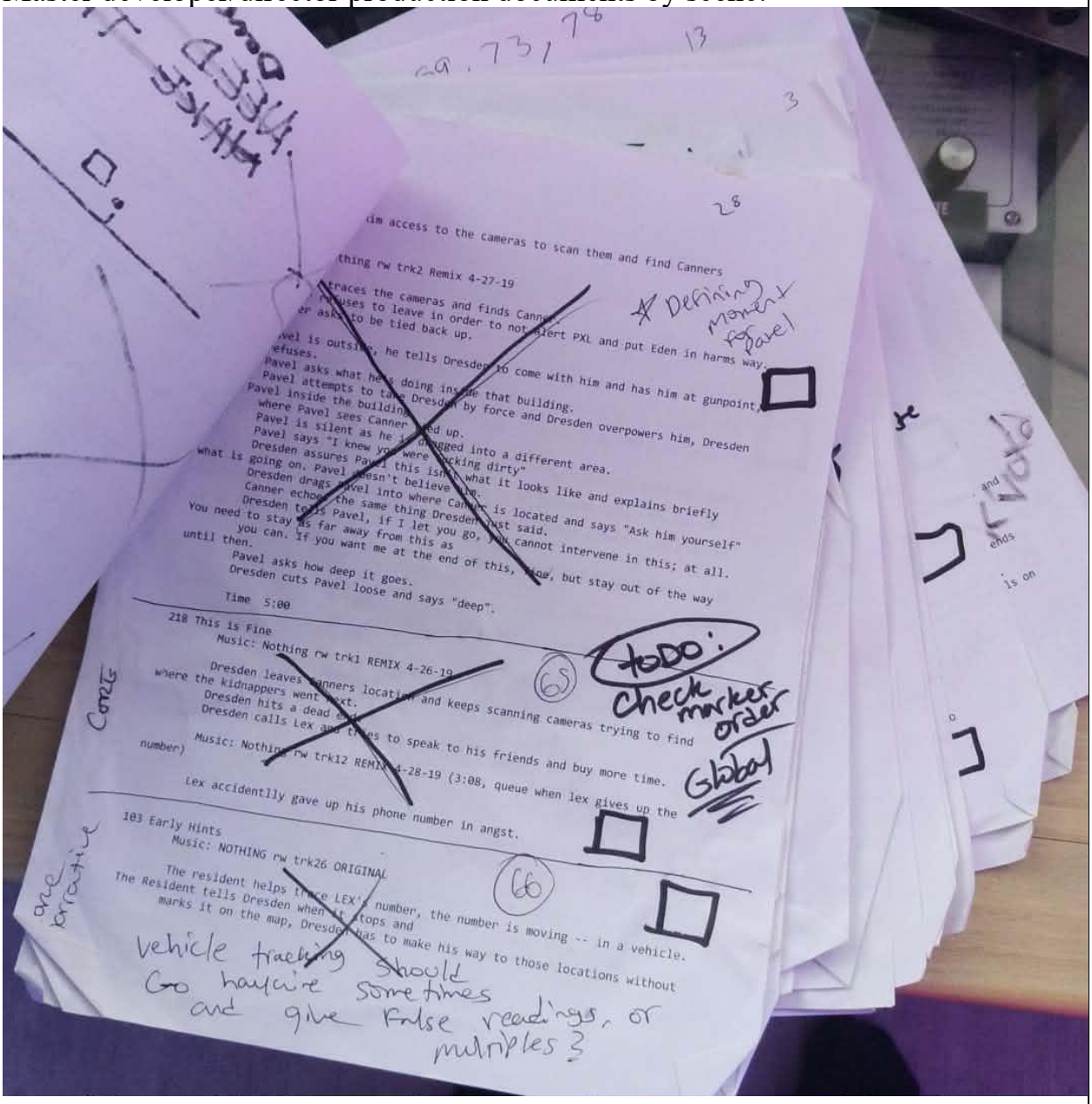
EXHIBIT 23

Plaintiff's 370 page original script:

Master developer/director production documents by scene:



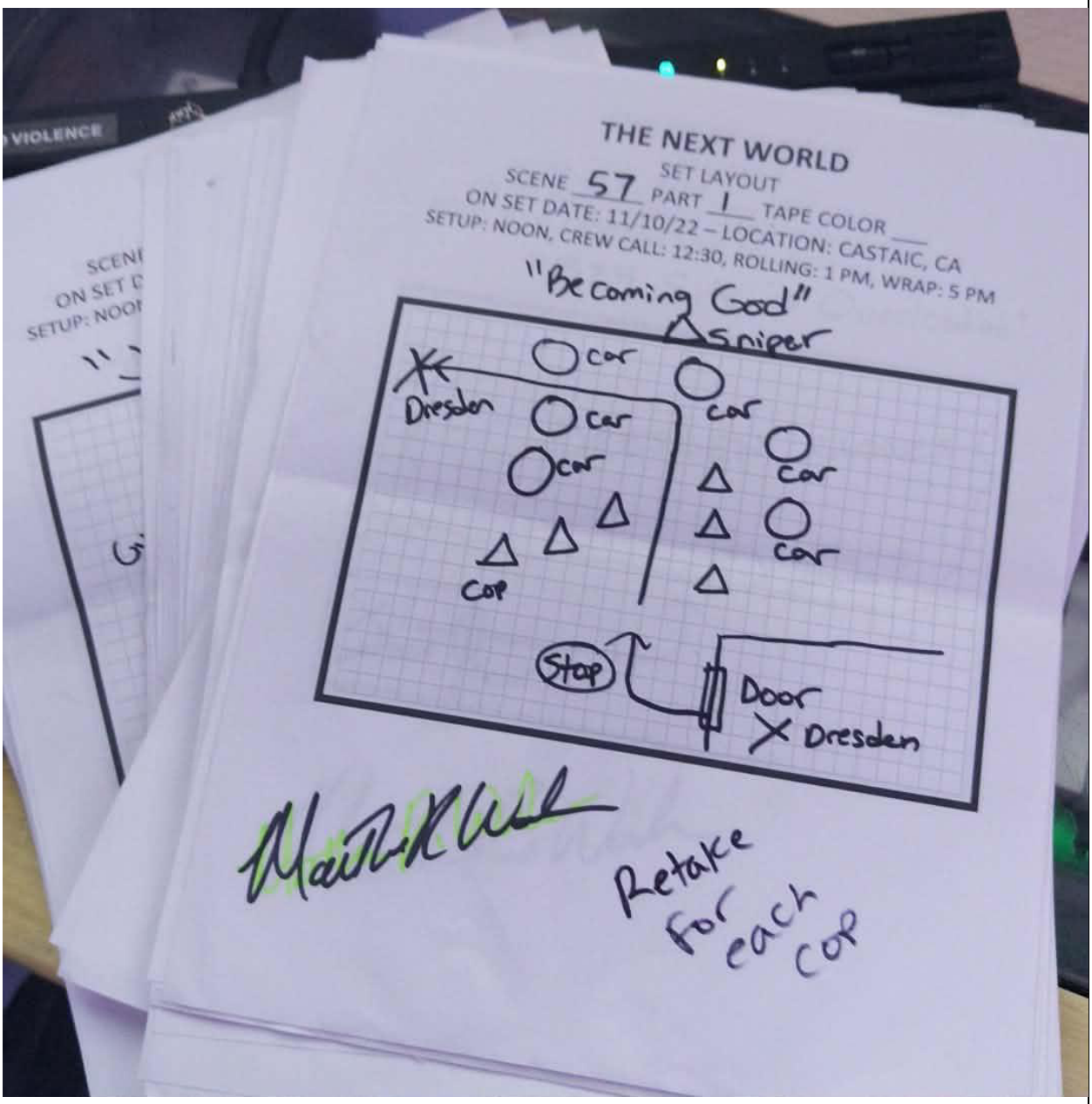
427 Master developer/director production documents by scene:



428

429

430 On-set motion capture floor maps and layouts, one for each 250+ scenes:



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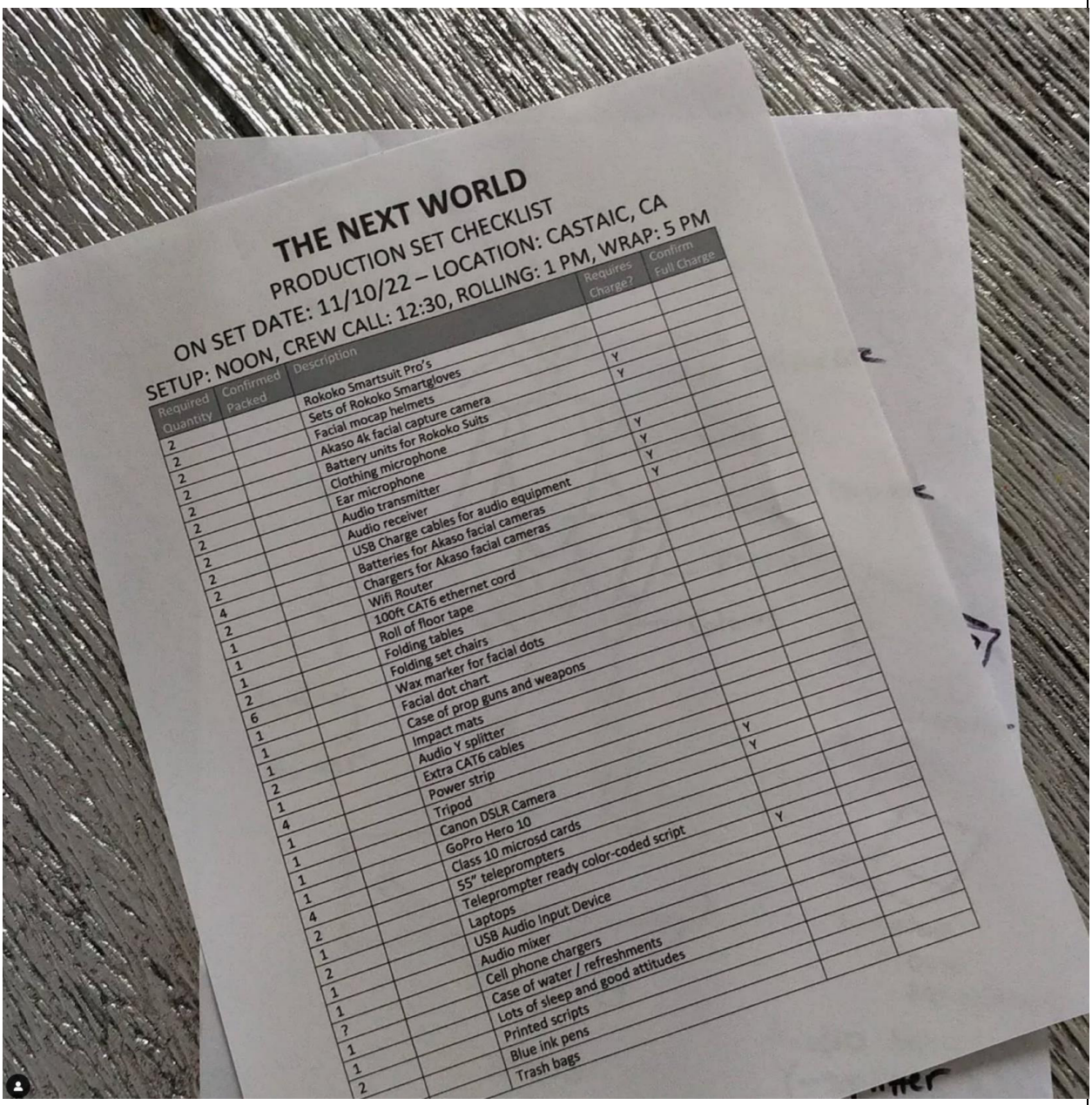
433 Set lists:



THE NEXT WORLD
PRODUCTION SET CHECKLIST
ON SET DATE: 11/10/22 – LOCATION: CASTAIC, CA
SETUP: NOON, CREW CALL: 12:30, ROLLING: 1 PM, WRAP: 5 PM

Required Quantity	Confirmed Packed	Description	Requires Charge?	Confirm Full Charge
2		Rokoko Smartsuit Pro's		
2		Sets of Rokoko Smartgloves	Y	
2		Facial mocap helmets	Y	
2		Akaso 4k facial capture camera		
2		Battery units for Rokoko Suits	Y	
2		Clothing microphone	Y	
2		Ear microphone	Y	
2		Audio transmitter	Y	
2		Audio receiver		
2		USB Charge cables for audio equipment		
2		Batteries for Akaso facial cameras		
2		Chargers for Akaso facial cameras		
2		Wifi Router		
4		100ft CAT6 ethernet cord		
2		Roll of floor tape		
1		Folding tables		
1		Folding set chairs		
1		Wax marker for facial dots		
2		Facial dot chart		
6		Case of prop guns and weapons		
1		Impact mats		
1		Audio Y splitter	Y	
1		Extra CAT6 cables	Y	
2		Power strip		
1		Tripod		
4		Canon DSLR Camera		
1		GoPro Hero 10		
1		Class 10 microsd cards		
1		55" teleprompters		
1		Teleprompter ready color-coded script	Y	
4		Laptops		
2		USB Audio Input Device		
1		Audio mixer		
2		Cell phone chargers		
1		Case of water / refreshments		
1		Lots of sleep and good attitudes		
?		Printed scripts		
1		Blue ink pens		
1		Trash bags		
2				

434

EXHIBIT 24

Fight sequences along with Hollywood veteran stuntman, stunt coordinator, and Krav Maga expert Aaron D. Alexander (Creed, Halo, Lucifer, Daredevil, A Quiet Place II, Agents of S.H.I.E.L.D, Batman, etc.)

448

EXHIBIT 25

Weapon and tactical sequences along with Hollywood veteran stuntman, stunt coordinator, and Krav Maga expert Aaron D. Alexander (Creed, Halo, Lucifer, Daredevil, A Quiet Place II, Agents of S.H.I.E.L.D, Batman, etc.)

EXHIBIT 26

469 Dialog and cinematic performances

470

471

EXHIBIT 27

Defendant deletes your original files, so you must rely on them if you want your intellectual property back. They also force you to pay them to retrieve your animation data, holding it hostage for their uses.

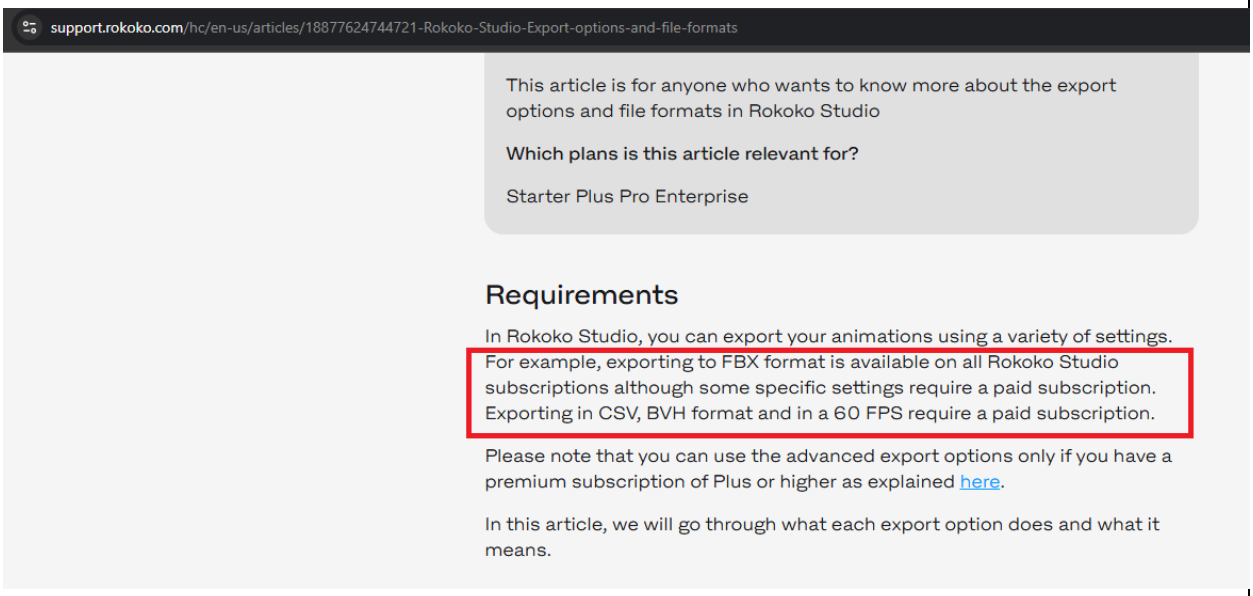
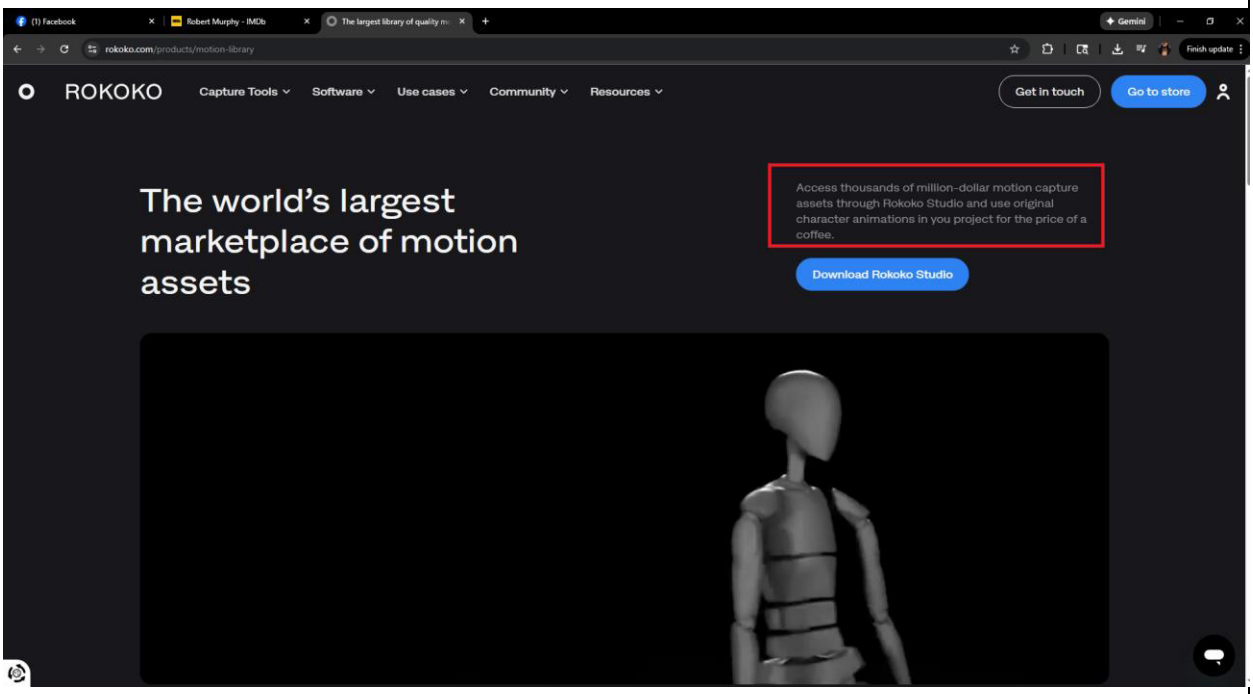


EXHIBIT 28

493 Defendant has admitted to and stated they sell [“thousands of million-dollar

494 animation assets” to their users “for the price of a coffee”]



495

EXHIBIT 29

503 Defendant's other clients include Netflix, Sony, EA Games, Square Enix and more.

504

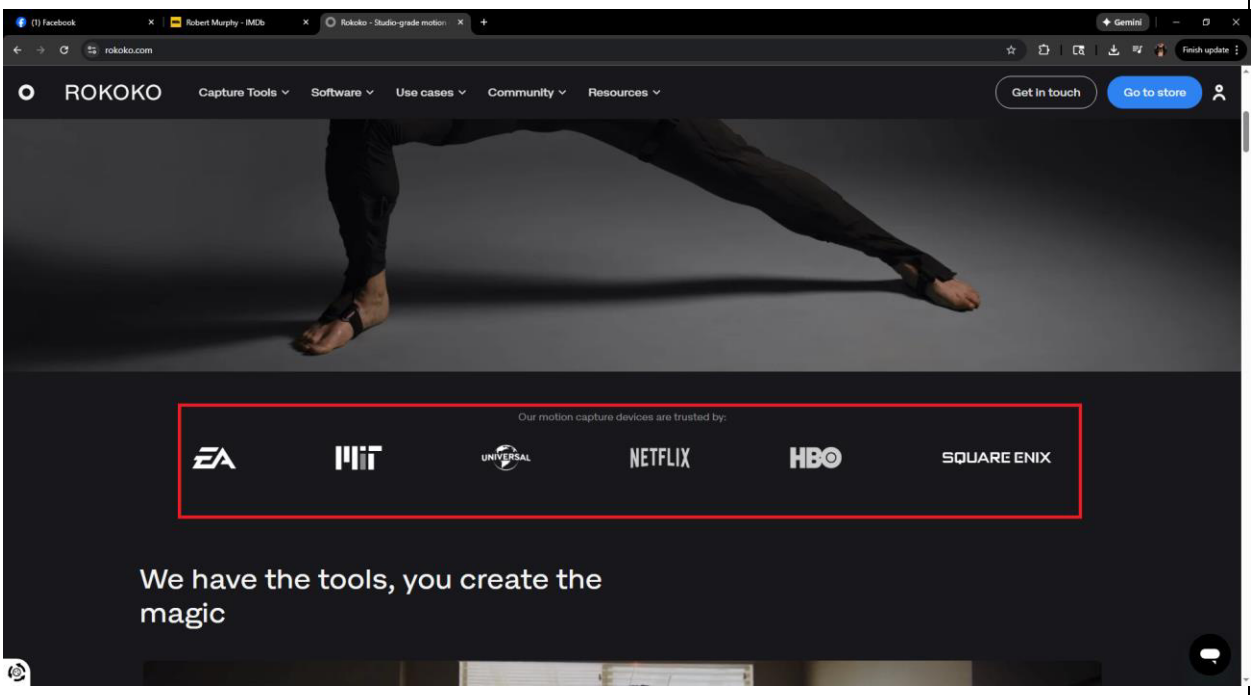


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EXHIBIT 30

Defendant in 2025 placed text in their terms, which declares that any visitor automatically agrees to any and all terms for all products they offer, even before reading the terms, just simply by visiting the site even for review.

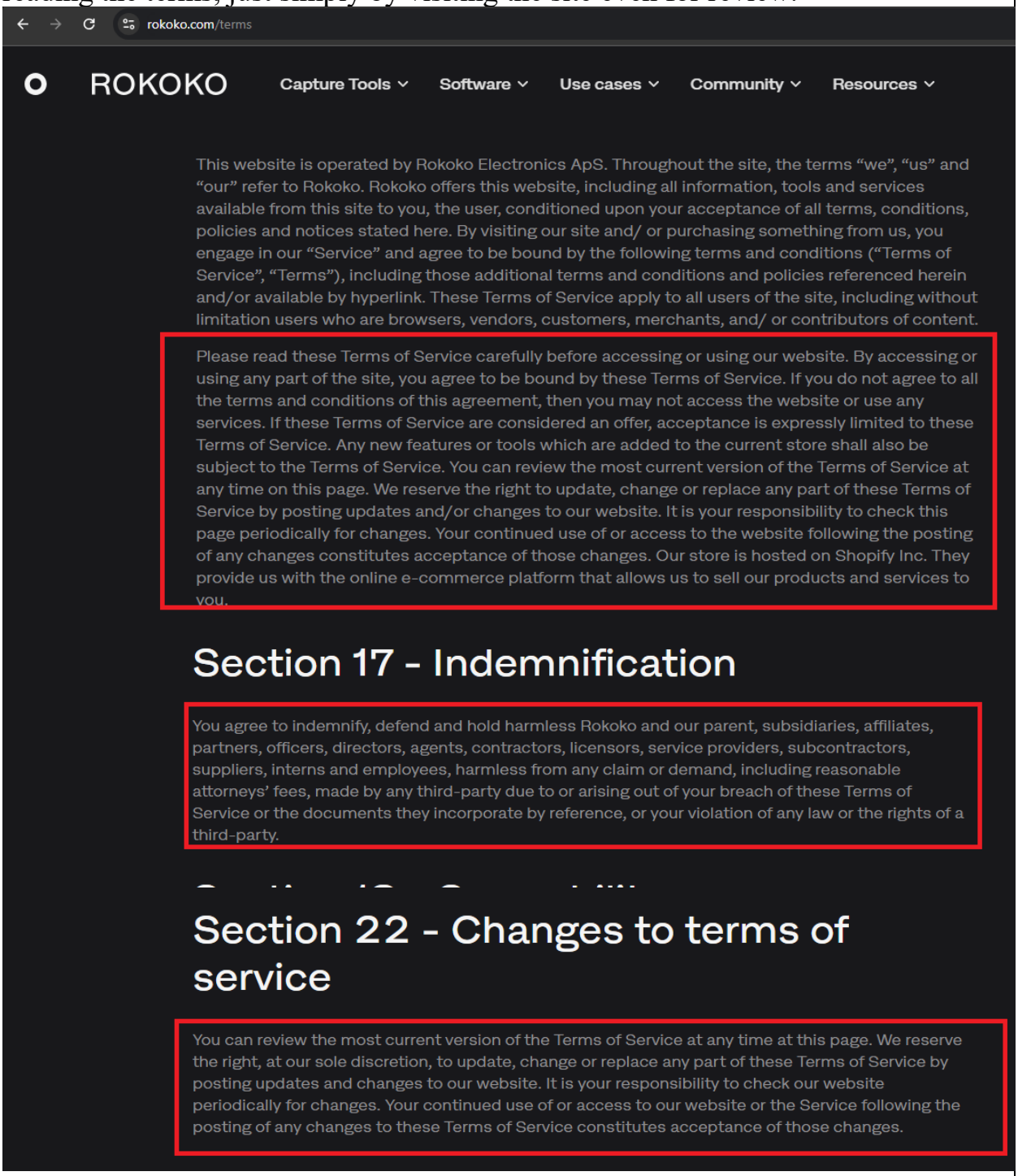

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EXHIBIT 31

Defendant employed hidden code to harvest user-animation for years. Multiple testing has confirmed, the ports listed do not function and are not active until certain triggers are met.

WebSocketServer.cs

```
// Decompiled with JetBrains decompiler
// Type: TeamSharingWebSocketSharp.Server.WebSocketServer
// Assembly: teamsharing-websocket, Version=1.0.0.0, Culture=neutral, PublicKeyToken=null
// MVID: 5EA0B7FC-1D88-4F1F-8767-3915C0635F3E
// Assembly location: D:\Program Files (x86)\Rokoko Electronics ApS\Rokoko Studio\Rokoko Studio_Data\Managed\teamsharing-websocket.dll

using System;
using System.Net;
using System.Net.Sockets;
using System.Security.Principal;
using System.Threading;
using TeamSharingWebSocketSharp.Net;
using TeamSharingWebSocketSharp.Net.WebSockets;

#nullable disable
namespace TeamSharingWebSocketSharp.Server;

public class WebSocketServer
{
  private IPAddress _address;
  private bool _allowForwardedRequest;
  private TeamSharingWebSocketSharp.Net.AuthenticationSchemes _authSchemes;
  private static readonly string _defaultRealm = "SECRET AREA";
  private bool _dnsStyle;
  private string _hostname;
  private TcpListener _listener;
  private Logger _log;
  private int _port;
  private string _realm;
  private string _realmInUse;
  private Thread _receiveThread;
  private bool _reuseAddress;
  private bool _secure;
  private WebSocketServiceManager _services;
  private ServerSslConfiguration _sslConfig;
  private ServerSslConfiguration _sslConfigInUse;
  private volatile ServerState _state;
  private object _sync;
  private Func<IIdentity, TeamSharingWebSocketSharp.Net.NetworkCredential> _userCredFinder;

  public WebSocketServer()
  {
    IPAddress any = IPAddress.Any;
    this.init(any.ToString(), any, 80 ..., false);
  }

  public WebSocketServer(int port)
    : this(port, port == 443)
  {
  }

  public WebSocketServer(string url)
  {
    switch (url)
    {
      case null:
        throw new ArgumentNullException(nameof (url));
      case "":
        throw new ArgumentException("An empty string.", nameof (url));
      default:
        Uri result;
        string message;
        if (!WebSocketServer.tryCreateUri(url, out result, out message))
          throw new ArgumentException(message, nameof (url));
        string dnsSafeHost = result.DnsSafeHost;
        IPAddress ipAddress = dnsSafeHost.ToIPAddress();
        if (ipAddress == null)
          throw new ArgumentException("The host part could not be converted to an IP address.", nameof (url));
        if (!ipAddress.IsLocal())
          throw new ArgumentException("The IP address of the host is not a local IP address.", nameof (url));
        this.init(dnsSafeHost, ipAddress, result.Port, result.Scheme == "wss");
        break;
    }
```

There is no reason for this application to have a websocket SERVER built in.

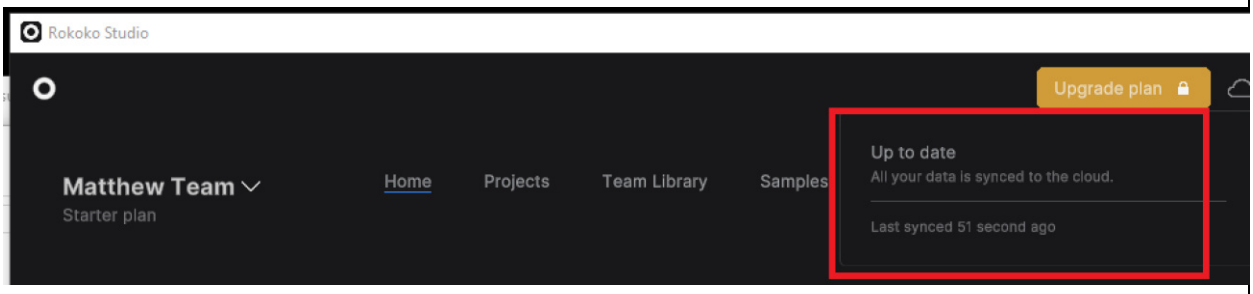
The server is only accessible to someone who has outside access to the 'secret area' realm.

Unfortunately this server contains massive file i/o functionality. Very strange.

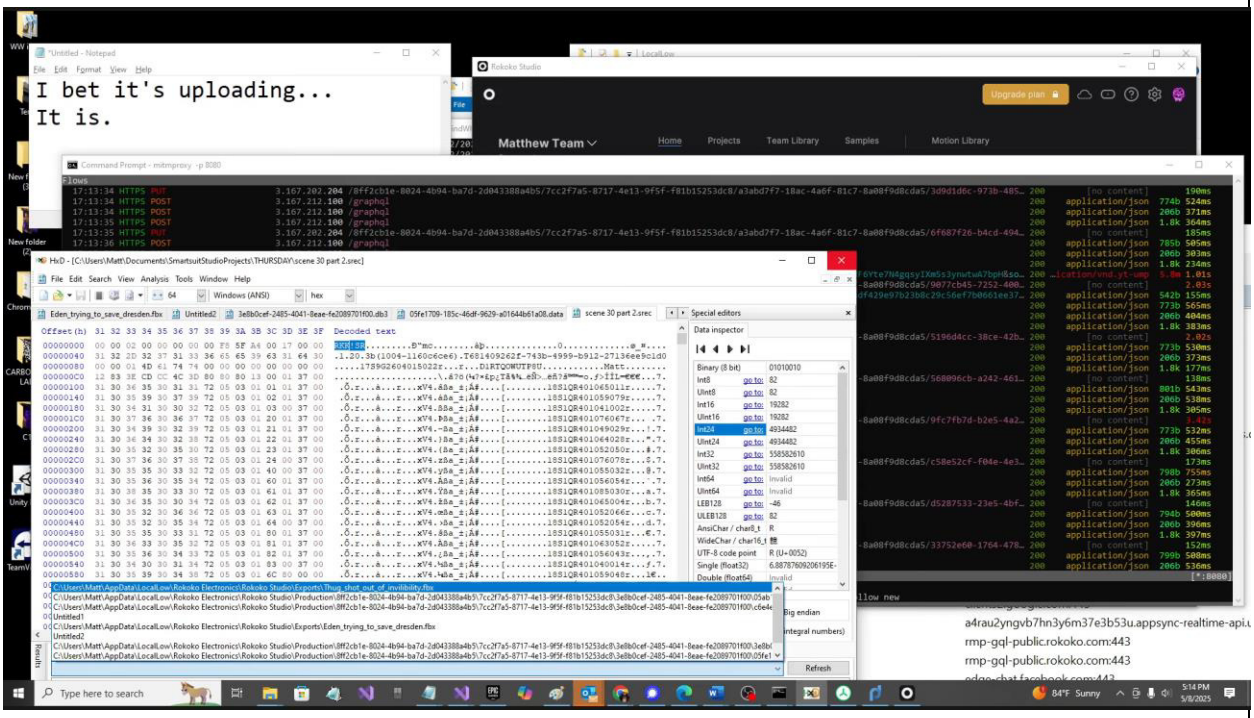
The server init's HTTP and HTTPS listeners.

EXHIBIT 32

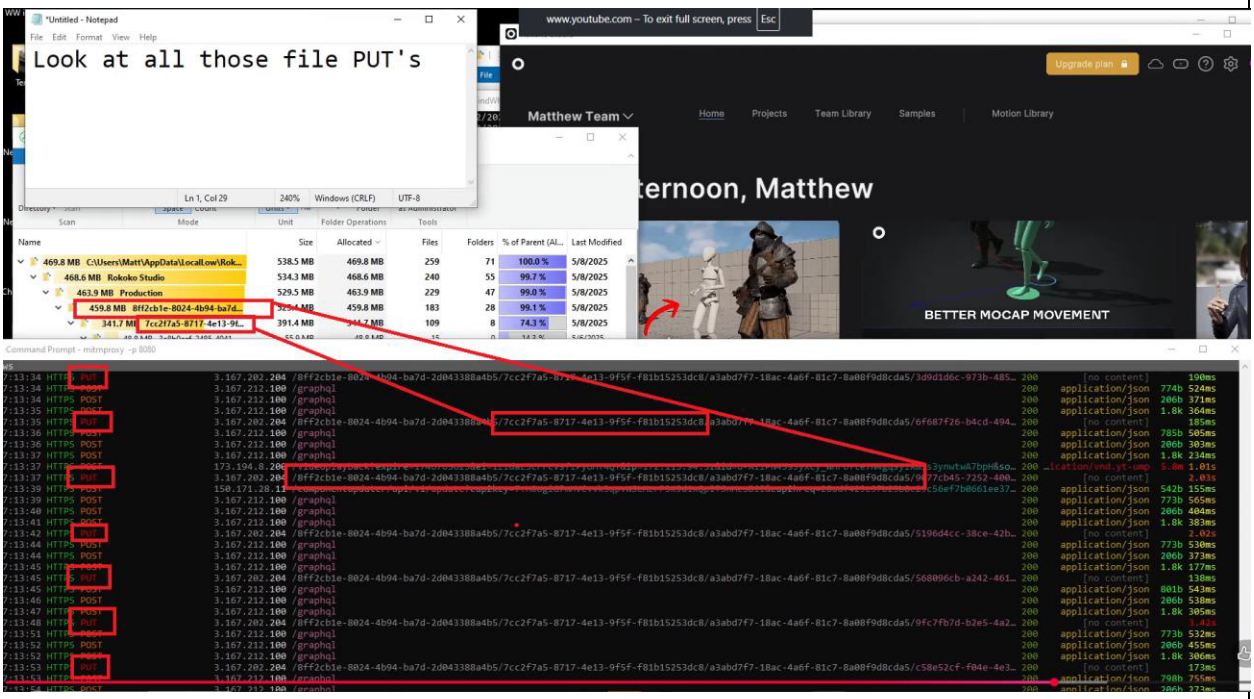
Evidence of the harvesting of Plaintiff's intellectual property



CMI exists within the files:



Defendant taking the files (and then deleting the originals afterwards, so they have the sole copy):



Once Defendant deletes your original files, they then hold your data hostage and do not allow you to even export it without paying them for your data back:

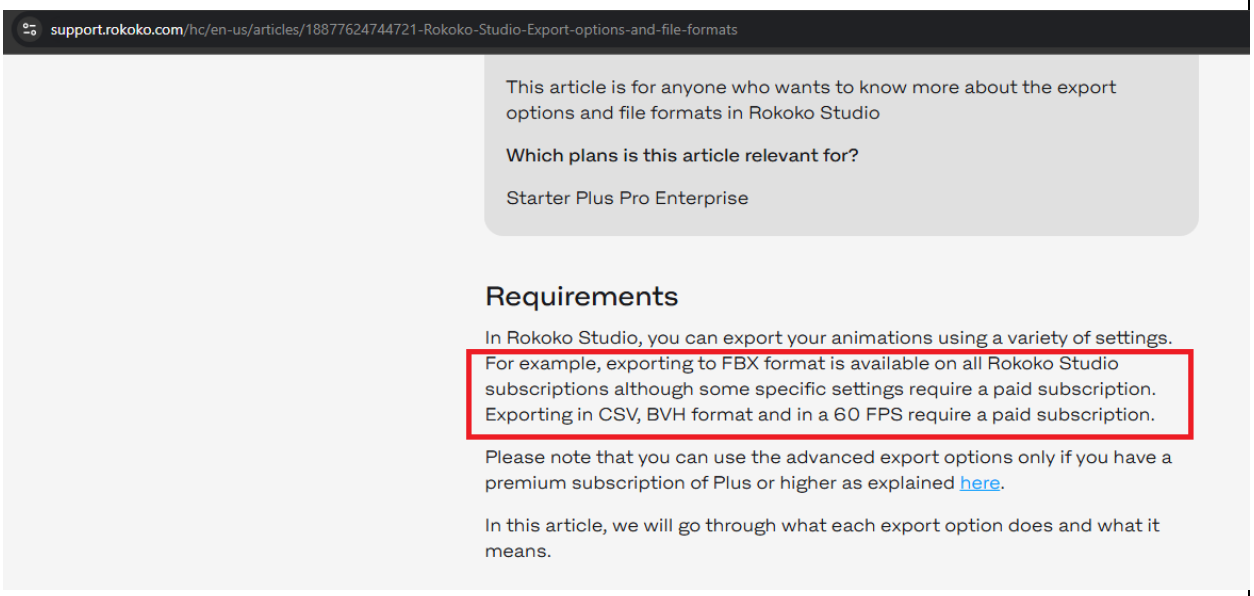
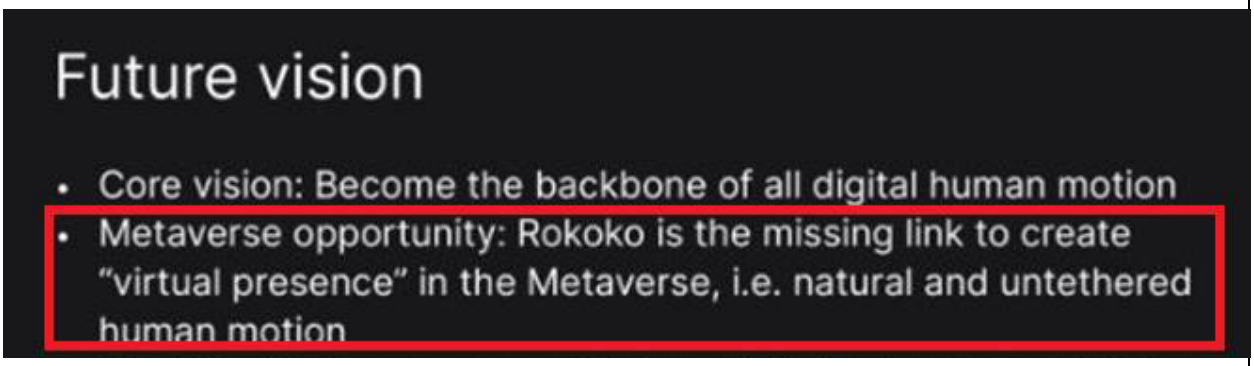


EXHIBIT 33

564 Defendant licensed Plaintiff's intellectual property to Naver-Z/Zepeto for their
565 Metaverse project, the parent company generates over $1.2 billion USD per year
566 and invested millions into Defendant for this access (Exhibit 33)
567
568 From 2022:



569
570 Naver-Z launched a fund:

techcrunch.com/2022/01/27/south-koreas-naver-z-launches-100m-fund-for-metaverse-creators/

TechCrunch Latest Startups Venture Apple Security AI Apps | Events

user-generated virtual space that's the rough equivalent of Roblox's "Experience", is 30 minutes.

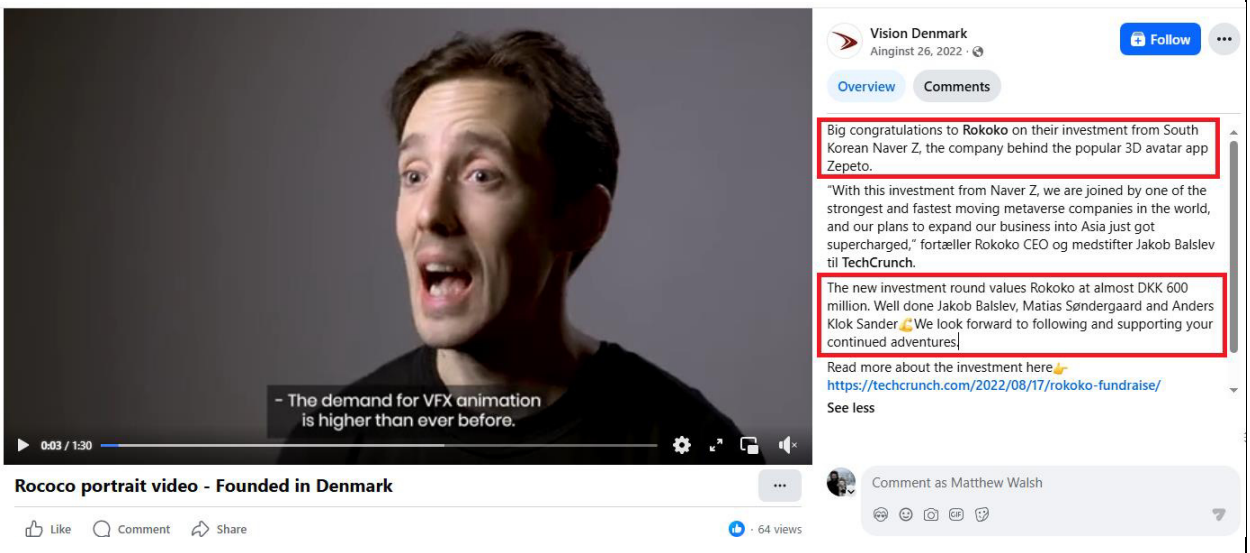
Zepeto has users around the world, but particularly among female teenagers and early twenty-somethings in South Korea and China. Given its target demographics, it's no surprise designer brands like Gucci and Ralph Lauren, as well as celebrities Blackpink and Selena Gomez, have tapped Zepeto to construct their own branded digital experiences. Designer accessories that are prohibitively expensive for most people in real life are suddenly more affordable in Zepeto's virtual world.

The $100 million creator fund will allow Zepeto to diversify the range of "metaverse" experiences it supports. Naver Z plans to take equity stakes in promising studios using the Unity plugin to generate 3D experiences on Zepeto, while it will also dole out cash rewards for high-potential Zepeto creators using the plugin, judging on performance metrics like plays, visits, and active users (those interested can apply via dl_ecofund@naverz-corp.com with links to their dev portfolio, said Lee).

The initiative arrives on the back of Naver Z's hefty $190 million Series B fundraising round last year, which was led by SoftBank Vision Fund II and joined by Mirae Asset, major K-pop talent agencies, and other investment firms.

571

572 Naver-Z then invested bringing the value of Rokoko to DKK 600M in 2022



573

574 DocuSign events show ongoing contracts being signed between Rokoko and

575 Naver-Z

DocuSign

Certificate Of Completion

Envelope Id: 0FD7938A4FD44C45A08A161A6AFA16CF
Subject: Rokoko Electronics ApS - 020224
Source Envelope:
Document Pages: 133
Certificate Pages: 8
AutoNav: Enabled
EnvelopeId Stamping: Enabled
Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Signatures: 59
Initials: 0

Status: Completed

Envelope Originator:
Anne-Sophie Gammelgaard Andersen
Højbro Plads 10, 2. (office 207)
nil
Copenhagen K, Copenhagen 1200
aga@highbridge.dk
IP Address: 82.192.175.2

Record Tracking

Status: Original
2/2/2024 3:19:44 AM

Holder: Anne-Sophie Gammelgaard Andersen
aga@highbridge.dk

Location: DocuSign

Signer Events	Signature	Timestamp
Electronic Record and Signature Disclosure: Accepted: 2/5/2024 12:06:14 AM ID: 8cb48002-ad23-4916-9892-11fba05cc86d		
Chang Kim dl_naverzcontract@naverz-corp.com CEO NAVER Z Limited Security Level: Email, Account Authentication (None)	DocuSigned by: EEF48BE796F94F6...	Sent: 2/2/2024 5:09:31 AM Resent: 2/5/2024 12:05:24 AM Resent: 2/6/2024 2:49:01 AM Resent: 2/6/2024 3:49:13 AM Viewed: 2/6/2024 3:50:20 AM Signed: 2/6/2024 3:50:35 AM
	Signature Adoption: Uploaded Signature Image Using IP Address: 211.249.71.131	

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EXHIBIT 34

Video evidence that Defendant's software works entirely offline, but once it reconnects, Defendant immediately takes any and all intellectual property generated or changed since the disconnection. Plaintiff has no teams account and has never signed up for one.

https://winteryear.com/videoView.php?id=171

Certificate of Authenticity:

The SHA-256 checksum of the original video file is:

BE7116827CD408335436D823F350E69B74412498E66011B5A65D07B9D56BB61C

This video, recorded by Plaintiff, shows that his animations created in Rokoko Studio are removed from his computer in their original format once Defendant takes them. This process is automatic, the user is never notified. There is no opt-in or opt-out for this feature, or terms anywhere in the software on signup or on login. This caused Plaintiff to lose access to all of his original works in unmodified formats.

https://winteryear.com/videoView.php?id=173

Certificate of Authenticity:

The SHA-256 checksum of the original video file is:

6574E3E5BAAB083C3F832E1A94D0561F964B938E7DD47BAAE975A88BE91D2C81

EXHIBIT 35

Defendant using keep-alive NAT hole punching along with MQTT to ensure they can always connect in and access the web/file server they built.

```
// Decompiled with JetBrains decompiler
// Type: TeamSharingMQTTnet.Server.MqttClientKeepAliveMonitor
// Assembly: teamsharing-mqtt, Version=1.0.0.0, Culture=neutral, PublicKeyToken=null
// MVID: 9F17C565-4F9B-4AE3-8613-DE44ADBB6EB1
// Assembly location: D:\Program Files (x86)\Rokoko Electronics ApS\Rokoko Studio\Rokoko Studio_Data\Managed\teamsharing-mqtt.dll

using System;
using System.Diagnostics;
using System.Runtime.CompilerServices;
using System.Threading;
using System.Threading.Tasks;
using TeamSharingMQTTnet.Diagnostics;
using TeamSharingMQTTnet.Packets;

#nullable disable
namespace TeamSharingMQTTnet.Server;

public sealed class MqttClientKeepAliveMonitor
{
  private readonly Stopwatch _lastPacketReceivedTracker = new Stopwatch();
  private readonly Stopwatch _lastNonKeepAlivePacketReceivedTracker = new Stopwatch();
  private readonly string _clientId;
  private readonly Func<Task> _timeoutCallback;
  private readonly IMqttNetLogger _logger;
  private Task _workerTask;

  public MqttClientKeepAliveMonitor(
    string clientId,
    Func<Task> timeoutCallback,
    IMqttNetLogger logger)
  {
    this._clientId = clientId;
    this._timeoutCallback = timeoutCallback;
    this._logger = logger;
  }

  public TimeSpan LastPacketReceived => this._lastPacketReceivedTracker.Elapsed;

  public TimeSpan LastNonKeepAlivePacketReceived
  {
    get => this._lastNonKeepAlivePacketReceivedTracker.Elapsed;
  }

  public void Start(int keepAlivePeriod, CancellationToken cancellationToken)
  {
    if (keepAlivePeriod == 0)
      return;
    this._workerTask = (Task) Task.Run<ConfiguredTaskAwaitable>((Func<ConfiguredTaskAwaitable>) (() => this.RunAsync(keepAlivePeriod, cancellationToken).ConfigureAwait(false)), cancellationToken);
  }

  public void WaitForCompletion()
  {
    if (this._workerTask == null)
      return;
    Task.WaitAll(this._workerTask);
  }

  private async Task RunAsync(int keepAlivePeriod, CancellationToken cancellationToken)
  {
```

Studio uses MqTT for abstraction of connection functionality.

On top is their layer for the TeamsSyncWebsocketServer

This system is used as a keepalive function after hole punching through NAT. This allows the port to remain open to the public where external parties can connect in, send commands and download files from the machine -- any file.

EXHIBIT 36

Defendant forces reconnection to the internet after X number of days of being offline to ensure they can harvest the intellectual property a user has created.

LoginController.cs

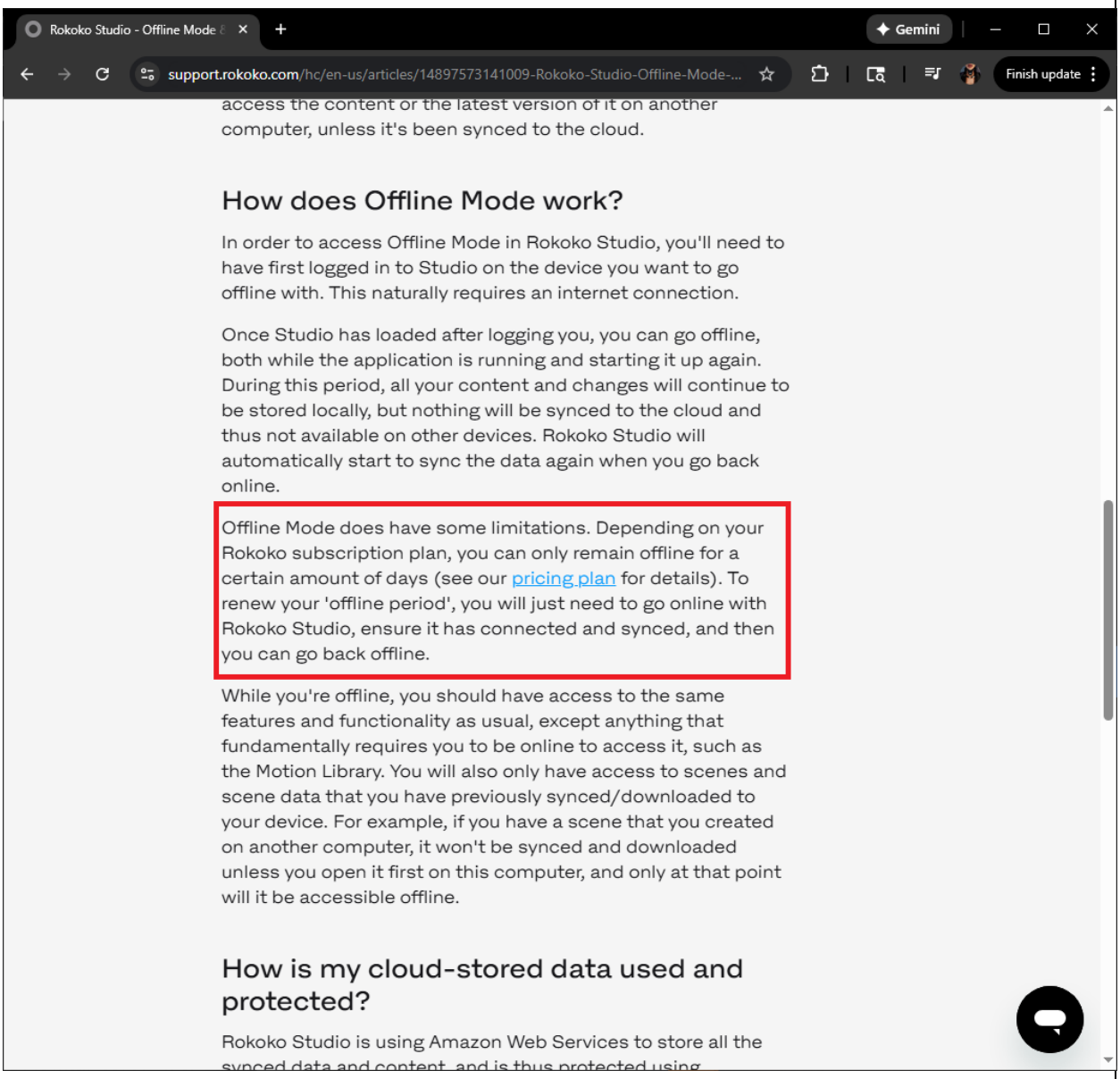
```
using Assets.Studio2.Scripts.Managers;
using RokokoSession.models;
using Studio2.Scripts.DependencyInjection;
using Studio2.Scripts.Managers;
using StudioRuntimes.Login;
using System;
using System.Threading.Tasks;
using UnityEngine;

#nullable disable
namespace Studio2.Scripts.Controllers;

public class LoginController : SerializedPropertyBase
{
  private const string FORGOT_PASSWORD_DIR = "/en/account/forgot";
  private const string SIGN_UP_DIR = "/en/account/sign-up-with-email";
  private bool _attemptAutoLoginOnStart = true;
  [StudioInject(StudioInjectionKey.ILoginAPI)]
  private readonly ILoginAPI _loginAPI;
  [StudioInject(StudioInjectionKey.IMixPanelTrackingManager)]
  private readonly IStudioMixPanelTrackingManager _mixPanelTrackingManager;
  private Serilog.ILogger _logger;
  private const string DefaultAwaitingResultTitle = "Go to the browser to complete";
  private const string SignInWithRefreshTokenTitle = "Authenticating";

  public static event EventHandler onLoginFormShown;

  protected override void Awake()
  {
    base.Awake();
    this._loginAPI.onUserLoginSuccess += new EventHandler<StudioUser>(this.LoginAPI_onUserLoginSuccess);
    this._loginAPI.onUserLoginFail += new EventHandler<string>(this.LoginAPI_onUserLoginFail);
    this._loginAPI.onSessionTokenExpired += new EventHandler(this.LoginAPI_onSessionTokenExpired);
    this._loginAPI.onUserLogout += new EventHandler<StudioUser>(this.LoginAPI_onUserLogout);
    this._loginAPI.onOfflineLicenseExpired += new EventHandler(this.LoginAPI_onOfflineLicenseExpired);
  }

  private async void Start()
  {
    LoginController context = this;
    context._logger = Entities.Abstractions.Helper.Logger.GetLogger<LoginController>().WithUnityContext((UnityEngine.Object) context);
    if (!context._attemptAutoLoginOnStart)
      return;
    try
    {
      await context.SignInWithRefreshToken();
    }
    catch (Exception ex)
    {
      context.ShowLoginScreen(ex.Message);
      context._logger.Error(ex, "Failed to sign in with refresh token");
    }
  }

  private void OnDestroy()
  {
    this._loginAPI.onUserLoginSuccess -= new EventHandler<StudioUser>(this.LoginAPI_onUserLoginSuccess);
    this._loginAPI.onUserLoginFail -= new EventHandler<string>(this.LoginAPI_onUserLoginFail);
    this._loginAPI.onSessionTokenExpired -= new EventHandler(this.LoginAPI_onSessionTokenExpired);
    this._loginAPI.onUserLogout -= new EventHandler<StudioUser>(this.LoginAPI_onUserLogout);
    this._loginAPI.onOfflineLicenseExpired -= new EventHandler(this.LoginAPI_onOfflineLicenseExpired);
  }

  private void LoginAPI_onUserLoginSuccess(object sender, StudioUser e)
  {
    AsyncThread.RunOnMainThread((Action) (() =>
    {
      this.HideLoginScreen();
      this._mixPanelTrackingManager.TrackSessionStart();
    }), callerMemberName: nameof (LoginAPI_onUserLoginSuccess), callerFilePath: "C:\\actions-runner\\win-runner-04\\_work\\rokoko-studio-2\\rokoko-studio-2\\Assets
  }

  private void LoginAPI_onUserLoginFail(object sender, string failMessage)
  {
    AsyncThread.RunOnMainThread((Action) (() => this.ShowLoginScreen(failMessage)), callerMemberName: nameof (LoginAPI_onUserLoginFail), callerFilePath: "C:\\actio
  }
```

Rokoko decides how long it wants to allow you to use the software offline for until it forces you to sync to their servers where they can take your data.

EXHIBIT 36

640 Defendant admits to forcing users back online to “sync” their intellectual property.

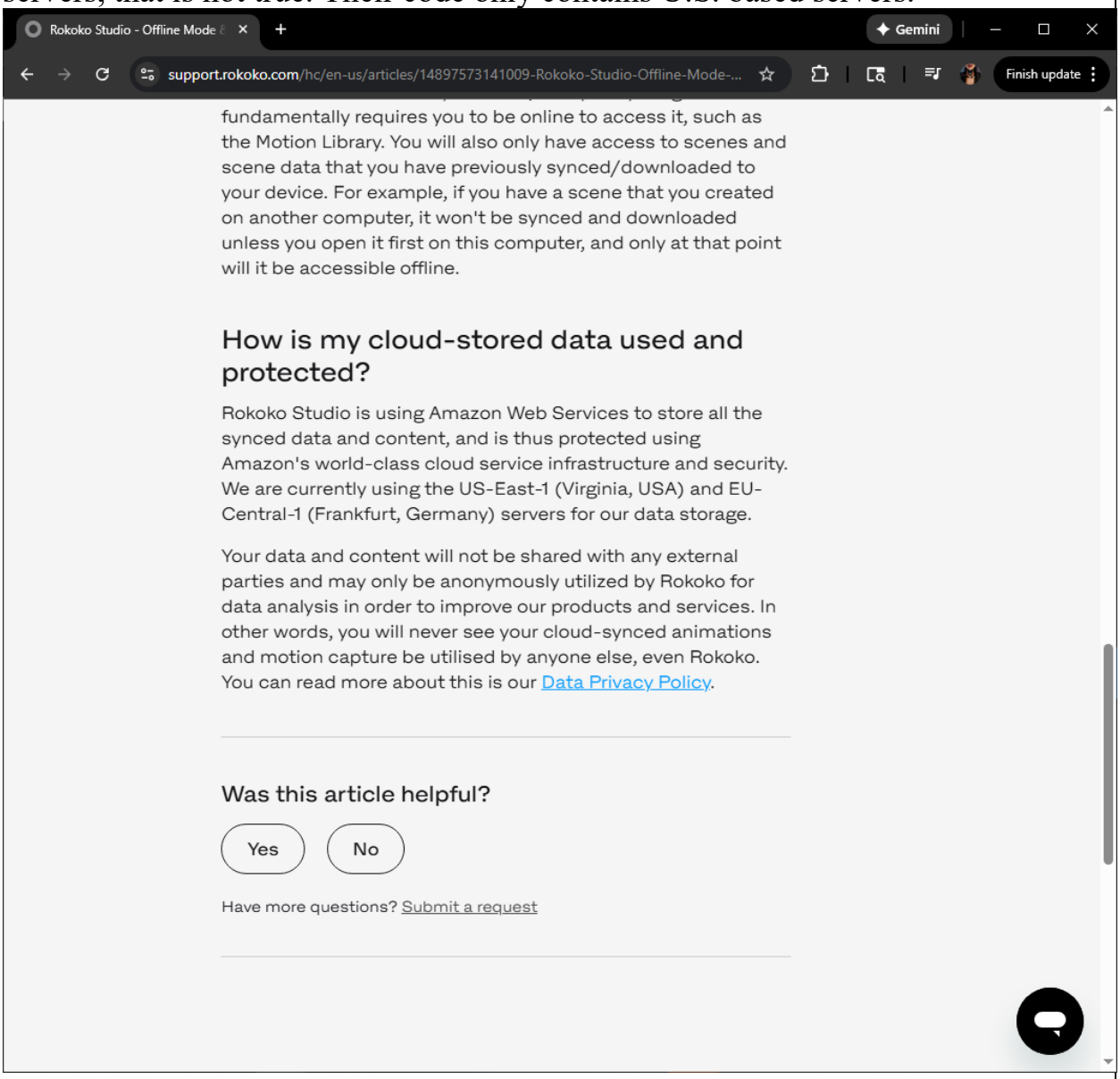
641



642

EXHIBIT 37

650 Defendant falsely states they are GDPR compliant and their software uses German
651 servers, that is not true. Their code only contains U.S. based servers.



652
653

EXHIBIT 38

Defendant's code only contains U.S. servers, despite what they state to users and the GDPR and European governments.

```
    this.Environment = env;
    this._setStudioOptIn = appConsumer == AuthConsumer.Studio;
    this._pubApi = new RmpPublicApi(logger, this.Environment);
  }

  public Authentication(Serilog.ILogger logger, AuthEnvironment env = AuthEnvironment.Production, int timeoutSeconds = 6)
    : this(logger, AuthConsumer.Studio, env, timeoutSeconds)
  {
  }

  public void SetSession(UserSession session) => this._session = session;

  public AwsCognitoConfig getConfig() => this._config;

  private static AwsCognitoConfig GetConfig(AuthConsumer appConsumer, AuthEnvironment env)
  {
    switch (env)
    {
      case AuthEnvironment.Development:
        return new AwsCognitoConfig()
        {
          domain = "rokoko.ninja",
          cognitoServiceUrl = "https://rmp-auth.rokoko.ninja",
          cognitoUserPoolId = "us-east-1_TAivR0DCY",
          cognitoClientId = Authentication.Trans("[illegible]", (short) -284),
          cognitoClientSecret = Authentication.Trans("[illegible]", (short) -691)
        };
      case AuthEnvironment.DevRelease:
        return new AwsCognitoConfig()
        {
          domain = "rokoko.cc",
          cognitoServiceUrl = "https://rmp-auth.rokoko.cc",
          cognitoUserPoolId = "us-east-1_OcBC8DO0o",
          cognitoClientId = Authentication.Trans("[illegible]", (short) -852),
          cognitoClientSecret = Authentication.Trans("[illegible]", (short) -129)
        };
      case AuthEnvironment.Staging:
        return new AwsCognitoConfig()
        {
          domain = "rokoko.rocks",
          cognitoServiceUrl = "https://rmp-auth.rokoko.rocks",
          cognitoUserPoolId = "us-east-1_gupQup69Z",
          cognitoClientId = Authentication.Trans("[illegible]", (short) -218),
          cognitoClientSecret = Authentication.Trans("[illegible]", (short) -189)
        };
      case AuthEnvironment.Production:
        return new AwsCognitoConfig()
        {
          domain = "rokoko.com",
          cognitoServiceUrl = "https://rmp-auth.rokoko.com",
          cognitoUserPoolId = "us-east-1_Sbmg9f1Rx",
          cognitoClientId = Authentication.Trans("[illegible]", (short) -124),
          cognitoClientSecret = Authentication.Trans("[illegible]", (short) -514)
        };
      default:
        return (AwsCognitoConfig) null;
    }
  }

  public async Task<CognitoResult> SignUp(SignUpParams signUpParams, CancellationToken ct)
  {
    if (string.IsNullOrEmpty(signUpParams.email) || string.IsNullOrEmpty(signUpParams.password))
      return CognitoResult.InvalidInput;
    Dictionary<string, string> userAttributes = new Dictionary<string, string>()
    {
      ["email"] = signUpParams.email,
      ["custom:mailing_list"] = signUpParams.optInMailingList ? "true" : "false"
    };
    if (!string.IsNullOrEmpty(signUpParams.givenName))
      userAttributes["given_name"] = signUpParams.givenName;
    if (!string.IsNullOrEmpty(signUpParams.familyName))
      userAttributes["family_name"] = signUpParams.familyName;
    if (signUpParams.jobArea != JobArea.Undefined)
      userAttributes["custom:job_area"] = this.MapJobArea(signUpParams.jobArea);
    if (signUpParams.organizationSize != OrganizationSize.Undefined)
      userAttributes["custom:organization_size"] = Authentication.MapOrganizationSize(signUpParams.organizationSize);
    if (this._setStudioOptIn)
    {
```

All U.S. based servers. No EU servers anywhere to be found

```
private readonly ConcurrentDictionary<string, object> _queryCache;
private readonly ILogger _logger;
private readonly string _realtimeApiId;
private object _realtimeAuth;
private readonly ResiliencePolicy _policy;

public bool ProcessSubscriptionsFromSelf { get; set; }

public AppSyncClient(
  ILogger logger,
  string endPoint,
  string realtimeApiId = null,
  ResiliencePolicy policy = null)
{
  NewtonsoftJsonSerializer serializer = new NewtonsoftJsonSerializer();
  serializer.JsonSerializerSettings.NullValueHandling = NullValueHandling.Ignore;
  GraphQLHttpClientOptions options = new GraphQLHttpClientOptions()
  {
    EndPoint = new Uri(endPoint)
  };
  AppSyncClient.ApplyWorkAroundForIllegalByteSequenceError(options);
  this.graphQLclient = new GraphQLHttpClient(options, (IGraphQLWebsocketJsonSerializer) serializer);
  this.graphQLclient.HttpClient.Timeout = TimeSpan.FromSeconds(30.0);
  this._mutationResponses = new ConcurrentDictionary<string, long>();
  this._subscriptions = new ConcurrentDictionary<string, IDisposable>();
  this._queryCache = new ConcurrentDictionary<string, object>();
  this._logger = logger;
  this._realtimeApiId = realtimeApiId;
  this._policy = policy;
}

public AppSyncClient(ILogger logger, string endPoint, string realtimeApiId = null)
  : this(logger, endPoint, realtimeApiId, (ResiliencePolicy) null)
{
}

private static void ApplyWorkAroundForIllegalByteSequenceError(GraphQLHttpClientOptions options)
{
  if (!(options.HttpMessageHandler is HttpClientHandler httpMessageHandler))
    throw new InvalidOperationException("options.HttpMessageHandler is not of type HttpClientHandler, check GraphQl
  httpMessageHandler.UseCookies = false;
}

public void SetCognitoHeader(string accessToken)
{
  if (string.IsNullOrEmpty(accessToken))
    this.graphQLclient.HttpClient.DefaultRequestHeaders.Remove("Authorization");
  else
    this.graphQLclient.HttpClient.DefaultRequestHeaders.Add("Authorization", accessToken);
  if (string.IsNullOrEmpty(this._realtimeApiId))
    return;
  this.ConfigRealTimeAuth((object) new
  {
    host = (this._realtimeApiId + ".appsync-api.us-east-1.amazonaws.com"),
    Authorization = accessToken
  });
}

protected void SetApiKeyHeader(string apiKey)
{
  this.graphQLclient.HttpClient.DefaultRequestHeaders.Add("x-api-key", apiKey);
  if (string.IsNullOrEmpty(this._realtimeApiId))
    return;
  this.ConfigRealTimeAuth((object) new
  {
    host = (this._realtimeApiId + ".appsync-api.us-east-1.amazonaws.com"),
    x_api_key = apiKey
  });
}

protected async Task<GraphQLResponse<T>> Query<T>(
  string query,
  object variables = null,
  TimeSpan? timeout = null,
  bool useCache = false,
  bool throwOnError = false,
  TimeSpan? cacheTtl = null)
{
  AppSyncClient appSyncClient = this;
  throwOnError = throwOnError || FeatureFlags.EntitiesResilience.AlwaysThrowFromAppsync;
  GraphQLRequest request = new GraphQLRequest()
  {
```

All U.S. based servers. No Denmark or EU

EXHIBIT 39

673 Defendant's code contains opt-out mechanisms, however, they do not allow any
674 users to opt-out, unless they PAY Rokoko to not collect their intellectual property.
675 Even with no teams account, no billing account, Rokoko forced collection of
676 Plainitff's intellectual property.
677

```
public async Task<List<RmpTeam>> LoadTeams()
{
  List<RmpTeam> collection = await uDPxfhmG9rFAVT0OZel4.FXp0VqZxljE((object) this.mWR0D1JnxLg, uDPxfhmG9rFAVT0OZel4.xA8mG3aaC92);
  this.rootData.Clear();
  this.rootData.teams.AddRange((IEnumerable<RmpTeam>) collection);
  foreach (RmpTeam rmpTeam in collection)
  {
    TeamExtraInfo teamExtraInfo = TeamExtraInfo.CreateDefaultInfo(KBew340dL7bKWEaXvnfA.FXp0VqZxljE((object) rmpTeam, KBew340dL7bKWEaXvnfA.E5u0dAWShOW));
    teamExtraInfo.OfflineDuration = WbhaoImGLOjGSp2bwn9O.FXp0VqZxljE(WbhaoImGLOjGSp2bwn9O.MyRmGAmwxCT) ? Cb0NXcmGkFZexStk2lLO.FXp0VqZxljE(1.0, Cb0NXcmGkFZexStk2
    try
    {
      RmpTeamLicense rmpTeamLicense = b06LqemGtfVXbFUtFSVB.FXp0VqZxljE((object) rmpTeam, b06LqemGtfVXbFUtFSVB.VIOmGMCpW8P);
      if (this.PMa0DCn4RAW(rmpTeamLicense))
      {
        Logger.GetLogger<BackendTeamPersistence>().Warning<TeamId>(cFY8uLIGhyRee236nI.mPEjhML6W(-2051205382 ^ -1558671922 ^ <Module>{e8d4249e-1ee0-4ee9-92e1
        teamExtraInfo.TrialRejected = true;
      }
      else
      {
        PlanEntitlements planEntitlements = tflCRkmG7PwyO8PCOS8k.FXp0VqZxljE((object) rmpTeamLicense, tflCRkmG7PwyO8PCOS8k.dxumG56gs6S);
        int num = J2XLpamGc45tHYRdBfZj.FXp0VqZxljE((object) planEntitlements, J2XLpamGc45tHYRdBfZj.GfSmGWdyJ9r) != 0 ? J2XLpamGc45tHYRdBfZj.FXp0VqZxljE((object)
        TimeSpan timeSpan = WbhaoImGLOjGSp2bwn9O.FXp0VqZxljE(WbhaoImGLOjGSp2bwn9O.MyRmGAmwxCT) ? Cb0NXcmGkFZexStk2lLO.FXp0VqZxljE((double) num, Cb0NXcmGkFZexSt
        teamExtraInfo = new TeamExtraInfo()
        {
          TeamId = KBew340dL7bKWEaXvnfA.FXp0VqZxljE((object) rmpTeam, KBew340dL7bKWEaXvnfA.E5u0dAWShOW),
          PlanType = SDSZtC0vu4ZVeNt67Aq1.FXp0VqZxljE((object) rmpTeamLicense, SDSZtC0vu4ZVeNt67Aq1.iSN0vxV1pcX),
          ExpiresAt = ww7X6vmGTo7ShtEnRZUN.FXp0VqZxljE((object) rmpTeamLicense, ww7X6vmGTo7ShtEnRZUN.TLamGVnMlJt),
          OfflineDuration = timeSpan,
          AccessFaceCapture = HHocVLmGNZHFYWlwmYNx.FXp0VqZxljE((object) planEntitlements, HHocVLmGNZHFYWlwmYNx.YNKmGJKWNPP),
          AccessLiveStreaming = gQaa8pmGdoRK2WWic6JR.FXp0VqZxljE((object) planEntitlements, gQaa8pmGdoRK2WWic6JR.IkgmGwq8FMB),
          AccessExportFileFormats = d8GhKmmGQNjILxIZ85PQ.FXp0VqZxljE((object) planEntitlements, d8GhKmmGQNjILxIZ85PQ.p6FmGjPRTrN),
          AccessExportSkeletonPresetOverrides = AuhM1hmGbg2ZtgLJ8Eje.FXp0VqZxljE((object) planEntitlements, AuhM1hmGbg2ZtgLJ8Eje.vsBmGqRk62l),
          AccessExportAdvancedOptions = XoGpj4mGBuLnF9SLykJx.FXp0VqZxljE((object) planEntitlements, XoGpj4mGBuLnF9SLykJx.DPQmG2pooRc),
          ExportOptionsPresetsLimit = KcSSUBmGuODv17jK8ROn.FXp0VqZxljE((object) planEntitlements, KcSSUBmGuODv17jK8ROn.X3YmGx4CtYF),
          ActorPresetsLimit = Hc6RqlmG4JVwWR977jOA.FXp0VqZxljE((object) planEntitlements, Hc6RqlmG4JVwWR977jOA.sREmGo8aqfV),
          FaceFiltersPresetsLimit = UtEY5cmGCT6Hqdc2BODk.FXp0VqZxljE((object) planEntitlements, UtEY5cmGCT6Hqdc2BODk.DFAmGnNFkxC),
          AccessCommandApiAdvancedCommands = Wce2APmG8yvctFKCxVY0.FXp0VqZxljE((object) planEntitlements, Wce2APmG8yvctFKCxVY0.vhSmGlQv80b),
          AccessRetargeting = lH3mB5mGFJe0jqvX8H8N.FXp0VqZxljE((object) planEntitlements, lH3mB5mGFJe0jqvX8H8N.lB8mG1bAl53),
          AccessImportCharacter = IFy7SmmGvXEFObrA1Skb.FXp0VqZxljE((object) planEntitlements, IFy7SmmGvXEFObrA1Skb.hxfmGzSDV31),
          AccessRecordingTriggerMessages = EIDRHimDgIPiJ0msOgOL.FXp0VqZxljE((object) planEntitlements, EIDRHimDgIPiJ0msOgOL.FbkmDe7HGgt),
          CreatorSeatsLimit = tC8KKlmDvMq8b9gBA9nN.FXp0VqZxljE((object) planEntitlements, tC8KKlmDvMq8b9gBA9nN.UKsmD0gcDsO),
          DisableSyncing = lpLpOfmDmF0c6i0cMRIL.FXp0VqZxljE((object) planEntitlements, lpLpOfmDmF0c6i0cMRIL.hNdmDEUZqrq)
        };
      }
    }
    catch (Exception ex)
    {
      swc6k60oGFyLAoqAy46x.FXp0VqZxljE(Logger.GetLogger<BackendTeamPersistence>(), cFY8uLIGhyRee236nI.mPEjhML6W(-2082411269 ^ -188278919 ^ 364042362 ^ <Module>
    }
    this.rootData.teamExtraInfos.Add(KBew340dL7bKWEaXvnfA.FXp0VqZxljE((object) rmpTeam, KBew340dL7bKWEaXvnfA.E5u0dAWShOW), teamExtraInfo);
  }
  return (List<RmpTeam>) this.rootData.teams;
}
```

Set how long the user can stay offline

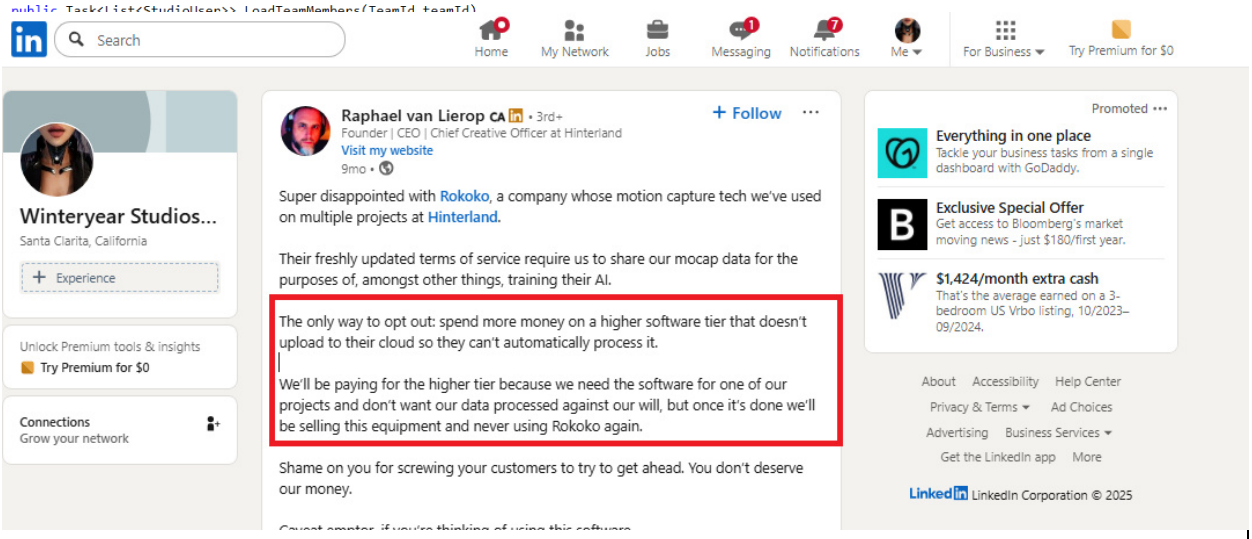
Try and load their teams license

If their trial is expired, kick them out

If their teams account is active, begin loading their access abilities

^ The ability to not "sync" or have Rokoko take intellectual property is built in, but only for people who pay for certain accounts. This is echoed online by other customers who have allegedly been approached by Rokoko: "if you don't want your IP used, pay us"

678



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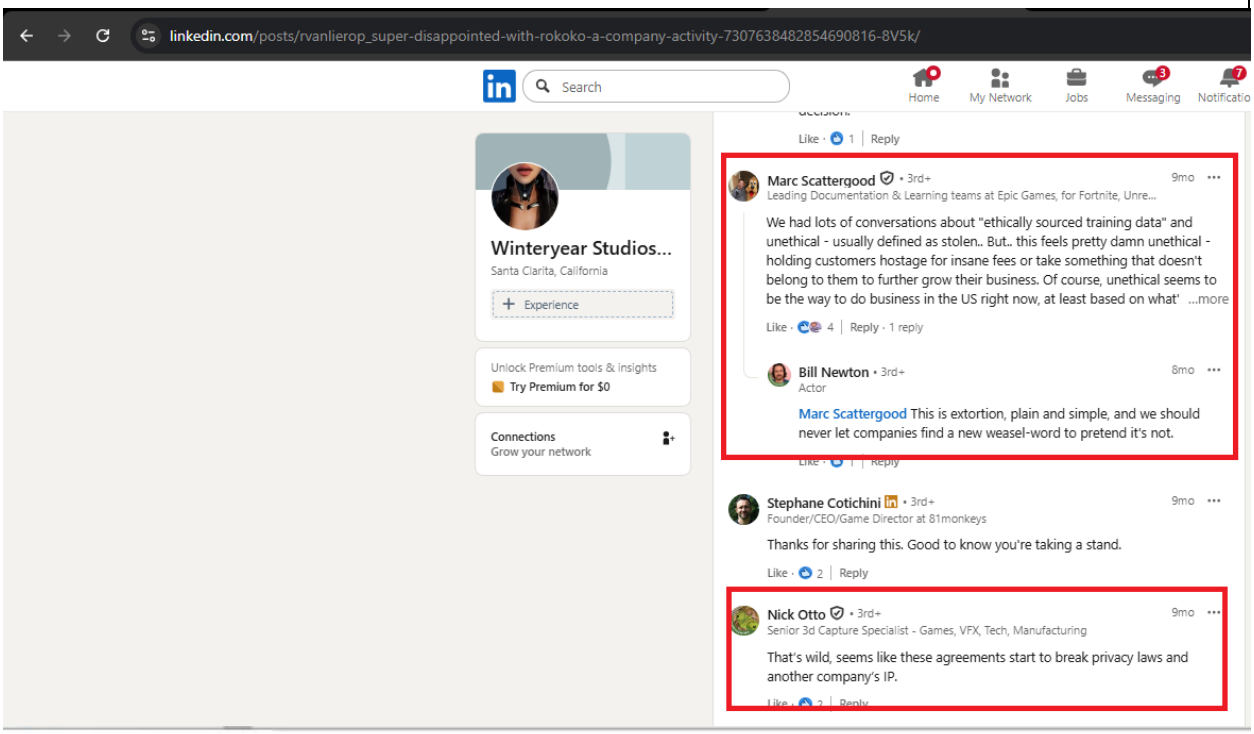
linkedin.com/posts/rvanlierop_super-disappointed-with-rokoko-a-company-activity-7307638482854690816-8V5k/
Search
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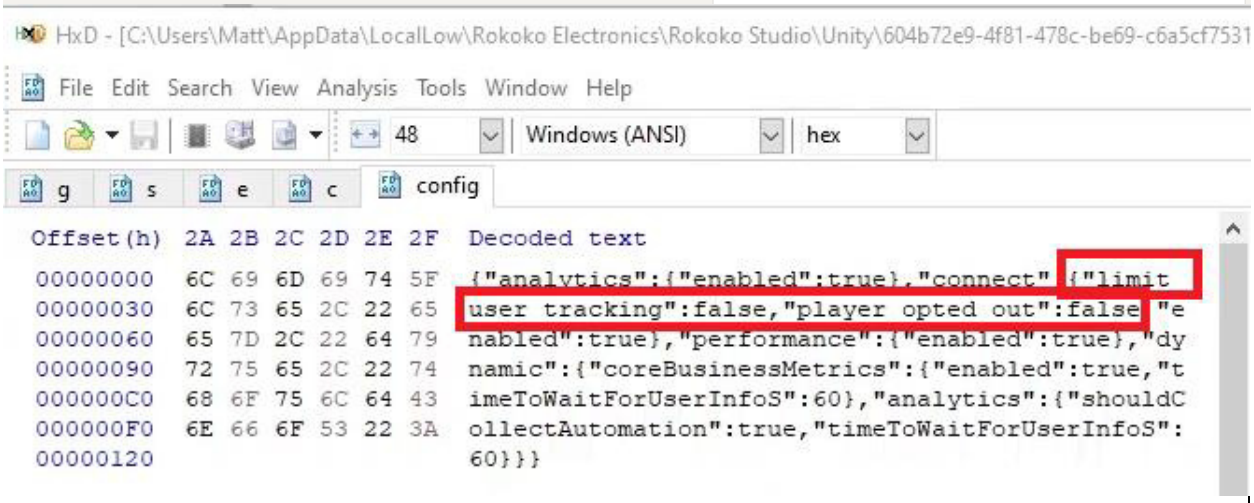
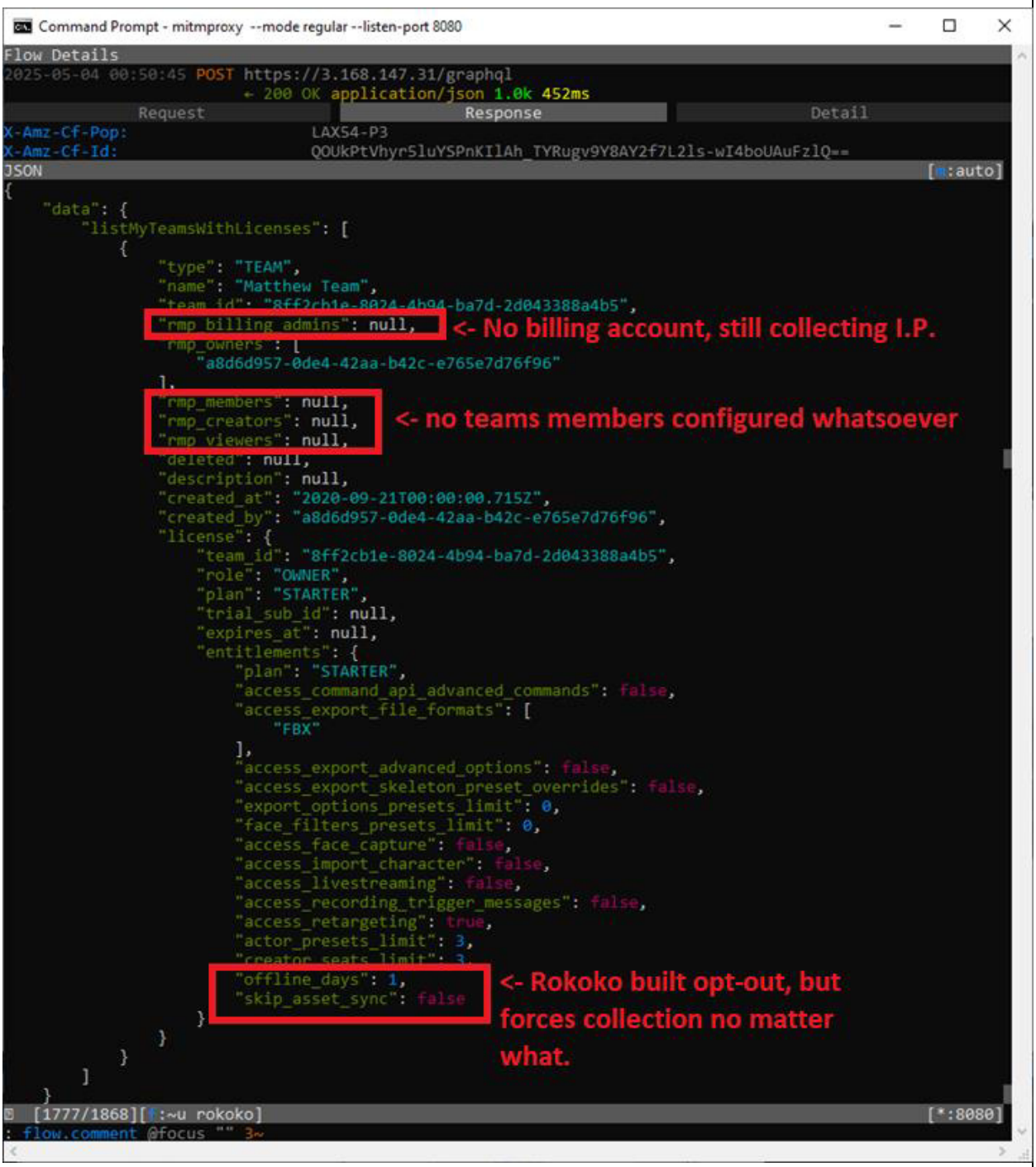
Jobs
Messaging
Winteryear Studios...
Santa Clarita, California
Experience
Unlock Premium tools & insights
Try Premium for $0
Connections
Grow your network
Like · 1 | Reply
Marc Scattergood • 3rd+
Leading Documentation & Learning teams at Epic Games, for Fortnite, Unre...
9mo
We had lots of conversations about "ethically sourced training data" and unethical - usually defined as stolen.. But.. this feels pretty damn unethical - holding customers hostage for insane fees or take something that doesn't belong to them to further grow their business. Of course, unethical seems to be the way to do business in the US right now, at least based on what' ...more
Like · 4 | Reply · 1 reply
Bill Newton • 3rd+
Actor
8mo
Marc Scattergood This is extortion, plain and simple, and we should never let companies find a new weasel-word to pretend it's not.
Stephane Cotichini • 3rd+
Founder/CEO/Game Director at 81monkeys
9mo
Thanks for sharing this. Good to know you're taking a stand.
Like · 2 | Reply
Nick Otto • 3rd+
Senior 3d Capture Specialist - Games, VFX, Tech, Manufacturing
9mo
That's wild, seems like these agreements start to break privacy laws and another company's IP.


HxD - [C:\Users\Matt\AppData\LocalLow\Rokoko Electronics\Rokoko Studio\Unity\604b72e9-4f81-478c-be69-c6a5cf7531
File Edit Search View Analysis Tools Window Help
48
Windows (ANSI)
hex
g
s
e
c
config
Offset(h) 2A 2B 2C 2D 2E 2F Decoded text
00000000 6C 69 6D 69 74 5F {"analytics":{"enabled":true},"connect" {"limit
00000030 6C 73 65 2C 22 65 user_tracking":false,"player_opted_out":false "e
00000060 65 7D 2C 22 64 79 nabled":true},"performance":{"enabled":true},"dy
00000090 72 75 65 2C 22 74 namic":{"coreBusinessMetrics":{"enabled":true,"t
000000C0 68 6F 75 6C 64 43 imeToWaitForUserInfoS":60},"analytics":{"shouldC
000000F0 6E 66 6F 53 22 3A ollectAutomation":true,"timeToWaitForUserInfoS":
00000120 60}}}

681


Command Prompt - mitmproxy --mode regular --listen-port 8080
Flow Details
2025-05-04 00:50:45 POST https://3.168.147.31/graphql
← 200 OK application/json 1.0k 452ms
Request
Response
Detail
X-Amz-Cf-Pop: LAX54-P3
X-Amz-Cf-Id: QOUkPtVhyr5luYSPnKIlAh_TYRugv9Y8AY2f7L2ls-wI4boUAuFzlQ==
JSON
[m:auto]
"rmp_billing_admins": null,
<- No billing account, still collecting I.P.
"rmp_members": null,
"rmp_creators": null,
"rmp_viewers": null,
<- no teams members configured whatsoever
"offline_days": 1,
"skip_asset_sync": false
<- Rokoko built opt-out, but forces collection no matter what.
[1777/1868][*:8080]

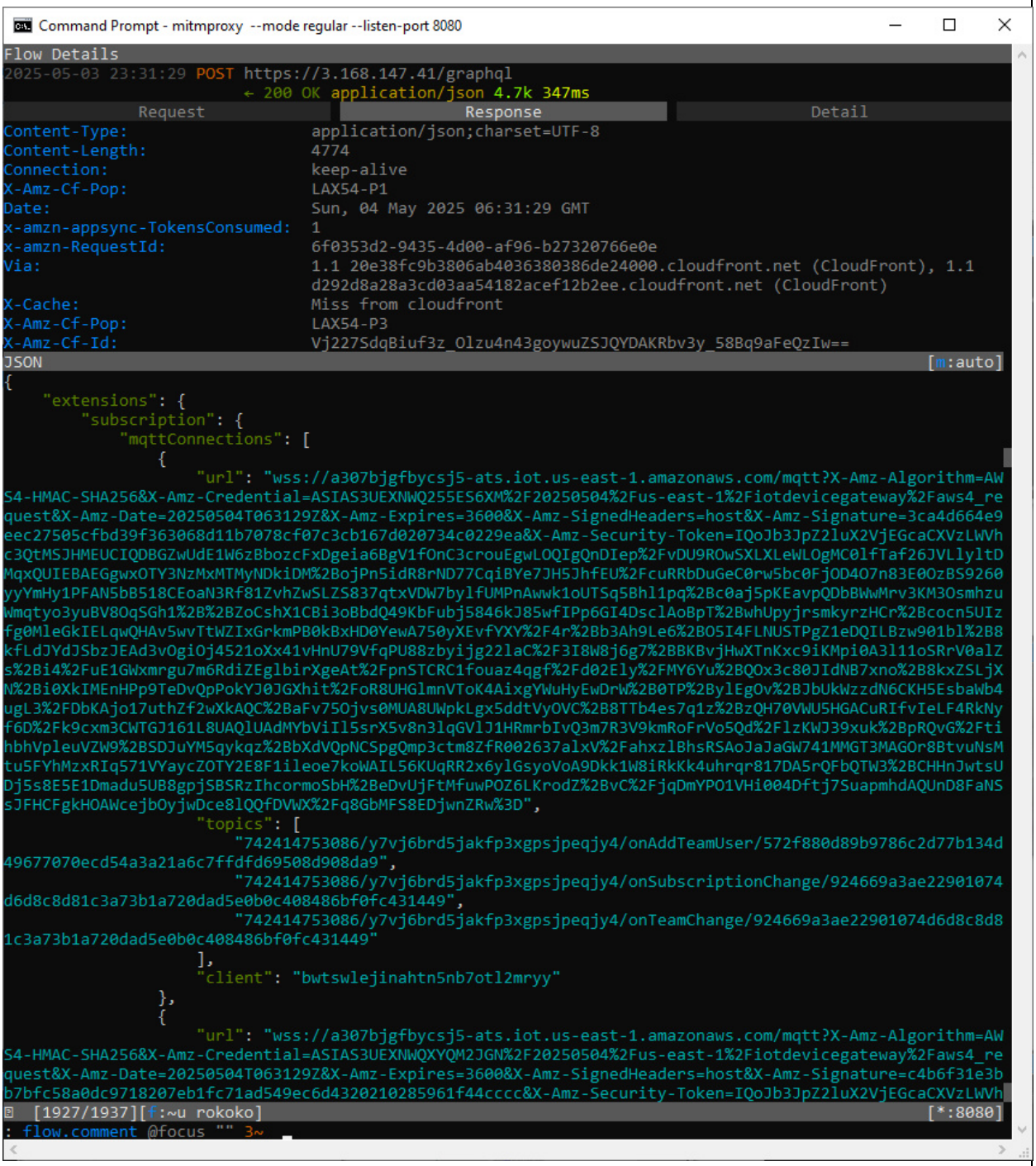
LoginController.cs

```
using Assets.Studio2.Scripts.Managers;
using RokokoSession.models;
using Studio2.Scripts.DependencyInjection;
using Studio2.Scripts.Managers;
using StudioRuntimes.Login;
using System;
using System.Threading.Tasks;
using UnityEngine;

#nullable disable
namespace Studio2.Scripts.Controllers;

public class LoginController : SerializedPropertyBase
{
  private const string FORGOT_PASSWORD_DIR = "/en/account/forgot";
  private const string SIGN_UP_DIR = "/en/account/sign-up-with-email";
  private bool _attemptAutoLoginOnStart = true;
  [StudioInject(StudioInjectionKey.ILoginAPI)]
  private readonly ILoginAPI _loginAPI;
  [StudioInject(StudioInjectionKey.IMixPanelTrackingManager)]
  private readonly IStudioMixPanelTrackingManager _mixPanelTrackingManager;
  private Serilog.ILogger _logger;
  private const string DefaultAwaitingResultTitle = "Go to the browser to complete";
  private const string SignInWithRefreshTokenTitle = "Authenticating";

  public static event EventHandler onLoginFormShown;

  protected override void Awake()
  {
    base.Awake();
    this._loginAPI.onUserLoginSuccess += new EventHandler<StudioUser>(this.LoginAPI_onUserLoginSuccess);
    this._loginAPI.onUserLoginFail += new EventHandler<string>(this.LoginAPI_onUserLoginFail);
    this._loginAPI.onSessionTokenExpired += new EventHandler(this.LoginAPI_onSessionTokenExpired);
    this._loginAPI.onUserLogout += new EventHandler<StudioUser>(this.LoginAPI_onUserLogout);
    this._loginAPI.onOfflineLicenseExpired += new EventHandler(this.LoginAPI_onOfflineLicenseExpired);
  }

  private async void Start()
  {
    LoginController context = this;
    context._logger = Entities.Abstractions.Helper.Logger.GetLogger<LoginController>().WithUnityContext((UnityEngine.Object) context);
    if (!context._attemptAutoLoginOnStart)
      return;
    try
    {
      await context.SignInWithRefreshToken();
    }
    catch (Exception ex)
    {
      context.ShowLoginScreen(ex.Message);
      context._logger.Error(ex, "Failed to sign in with refresh token");
    }
  }

  private void OnDestroy()
  {
    this._loginAPI.onUserLoginSuccess -= new EventHandler<StudioUser>(this.LoginAPI_onUserLoginSuccess);
    this._loginAPI.onUserLoginFail -= new EventHandler<string>(this.LoginAPI_onUserLoginFail);
    this._loginAPI.onSessionTokenExpired -= new EventHandler(this.LoginAPI_onSessionTokenExpired);
    this._loginAPI.onUserLogout -= new EventHandler<StudioUser>(this.LoginAPI_onUserLogout);
    this._loginAPI.onOfflineLicenseExpired -= new EventHandler(this.LoginAPI_onOfflineLicenseExpired);
  }

  private void LoginAPI_onUserLoginSuccess(object sender, StudioUser e)
  {
    AsyncThread.RunOnMainThread((Action) (() =>
    {
      this.HideLoginScreen();
      this._mixPanelTrackingManager.TrackSessionStart();
    }), callerMemberName: nameof (LoginAPI_onUserLoginSuccess), callerFilePath: "C:\\actions-runner\\win-runner-04\\_work\\rokoko-studio-2\\rokoko-studio-2\\Assets
  }

  private void LoginAPI_onUserLoginFail(object sender, string failMessage)
  {
    AsyncThread.RunOnMainThread((Action) (() => this.ShowLoginScreen(failMessage)), callerMemberName: nameof (LoginAPI_onUserLoginFail), callerFilePath: "C:\\actio
  }
```

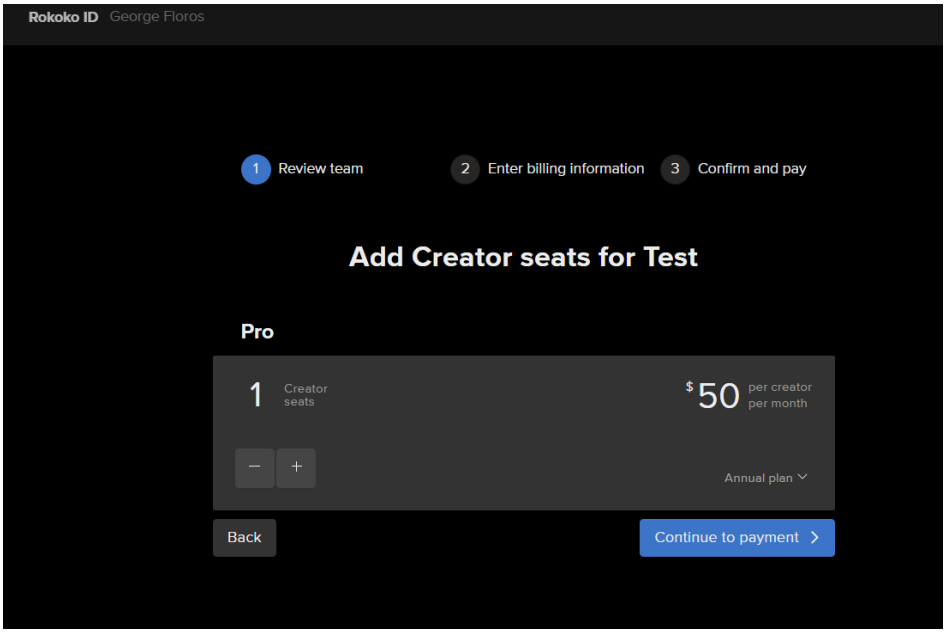
Rokoko decides how long it wants to allow you to use the software offline for until it forces you to sync to their servers where they can take your data.

EXHIBIT 40

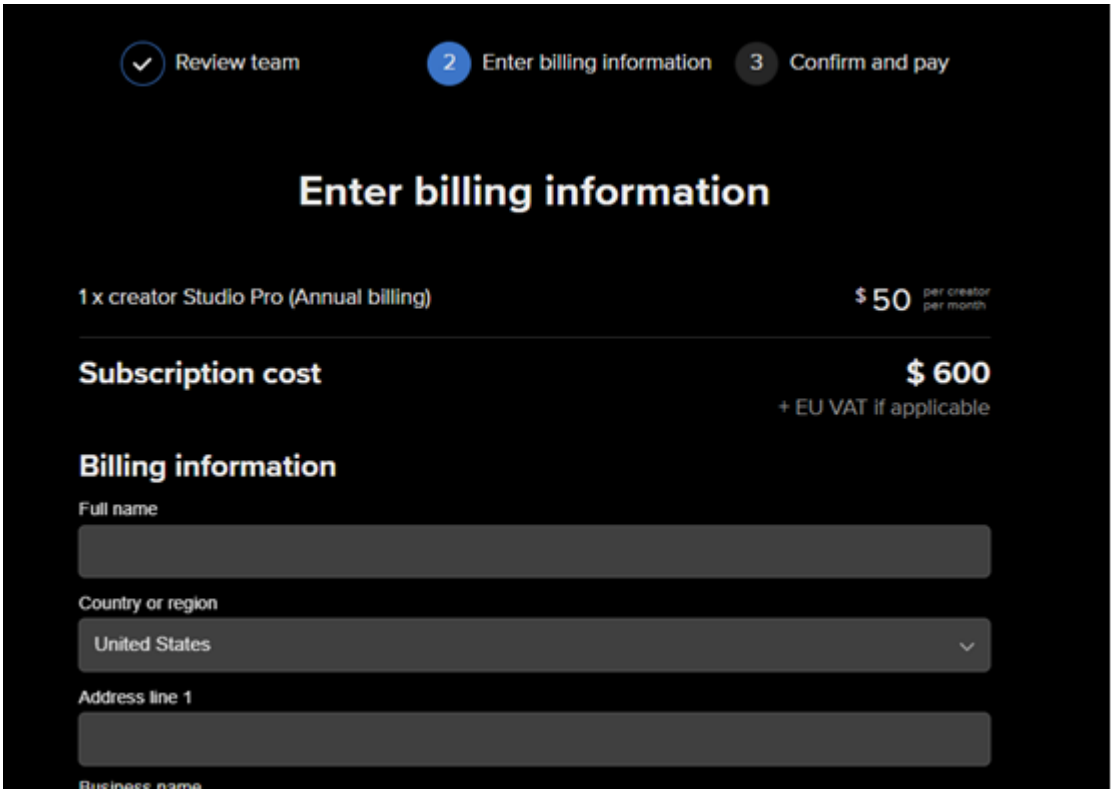
Defendant cannot hide behind the defense that the collection of his intellectual property was part of their 'Teams' subscription service, as, Plaintiff never signed up for teams, never paid an additional dollar in subscription or services to Defendant after purchase, yet, their software continually collected his intellectual property for years.



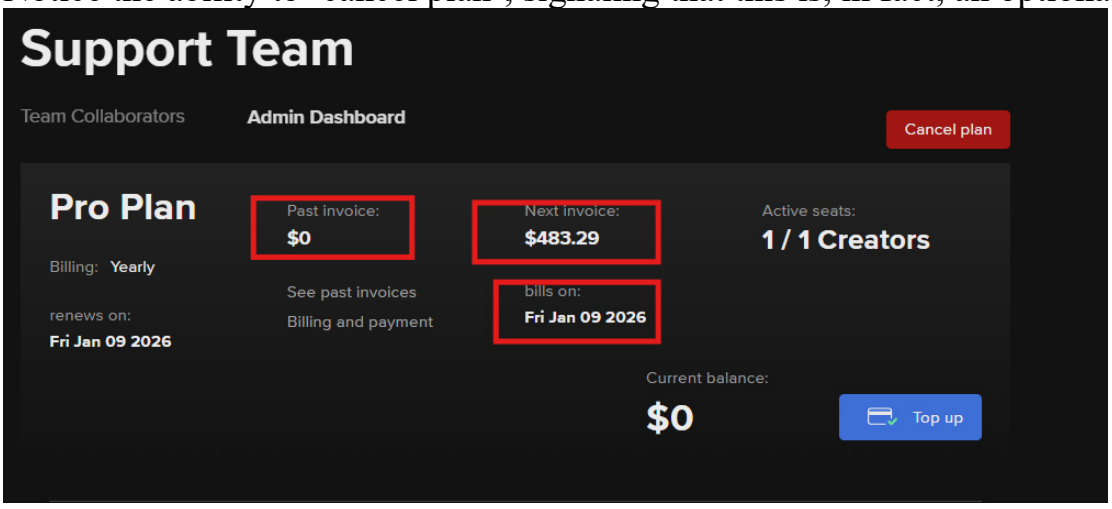
The process to creating a team with the software Plaintiff acquired was, if you *choose to*, log into the Rokoko website and add 'creators' for $50/mo



Then supply your billing information and pay the $600 + $50/mo. This never happened, Plaintiff never provided Rokoko with *any* payment information after the purchase and never begun nor completed any of these steps.



Notice the ability to 'cancel plan'; signaling that this is, in fact, an optional service

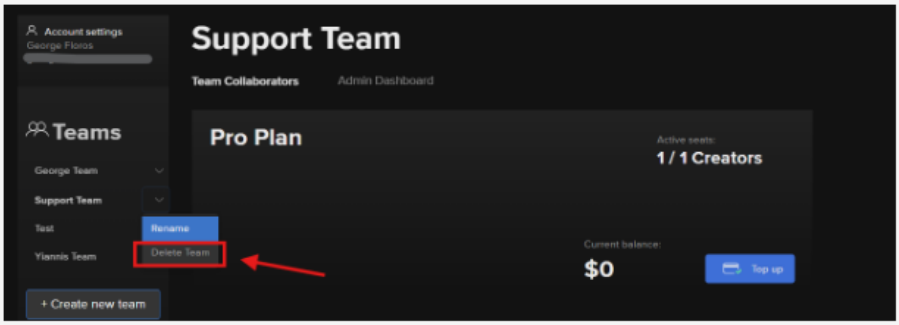


How to manage your Rokoko S

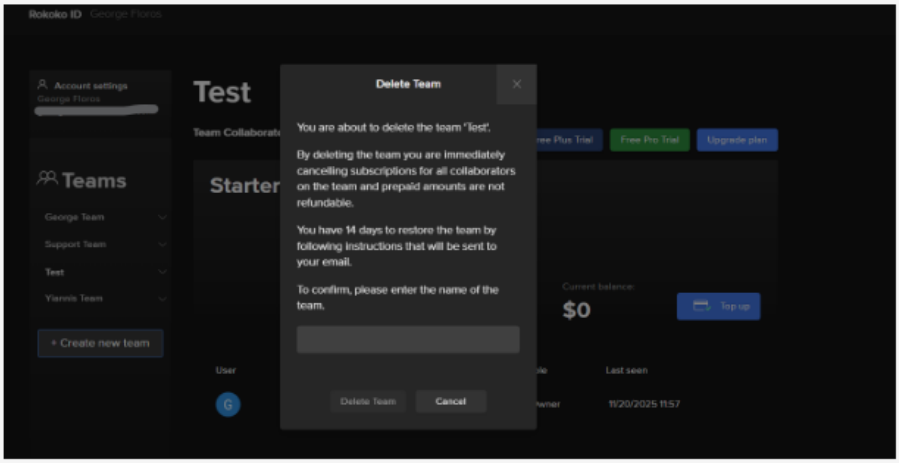
support.rokoko.com/hc/en-us/articles/4410424301329-How-to-manage-your-Rokoko-Studio-Team

Deleting a Team

Only Team owners can delete their team. Performing this action cancels all current subscriptions immediately, and hides the team for all members. It can be restored within 14 days by clicking a link that is sent to the owner(s) via email. After 14 days the team is erased. Any existing account balance is also lost.



An example of a team being deleted:

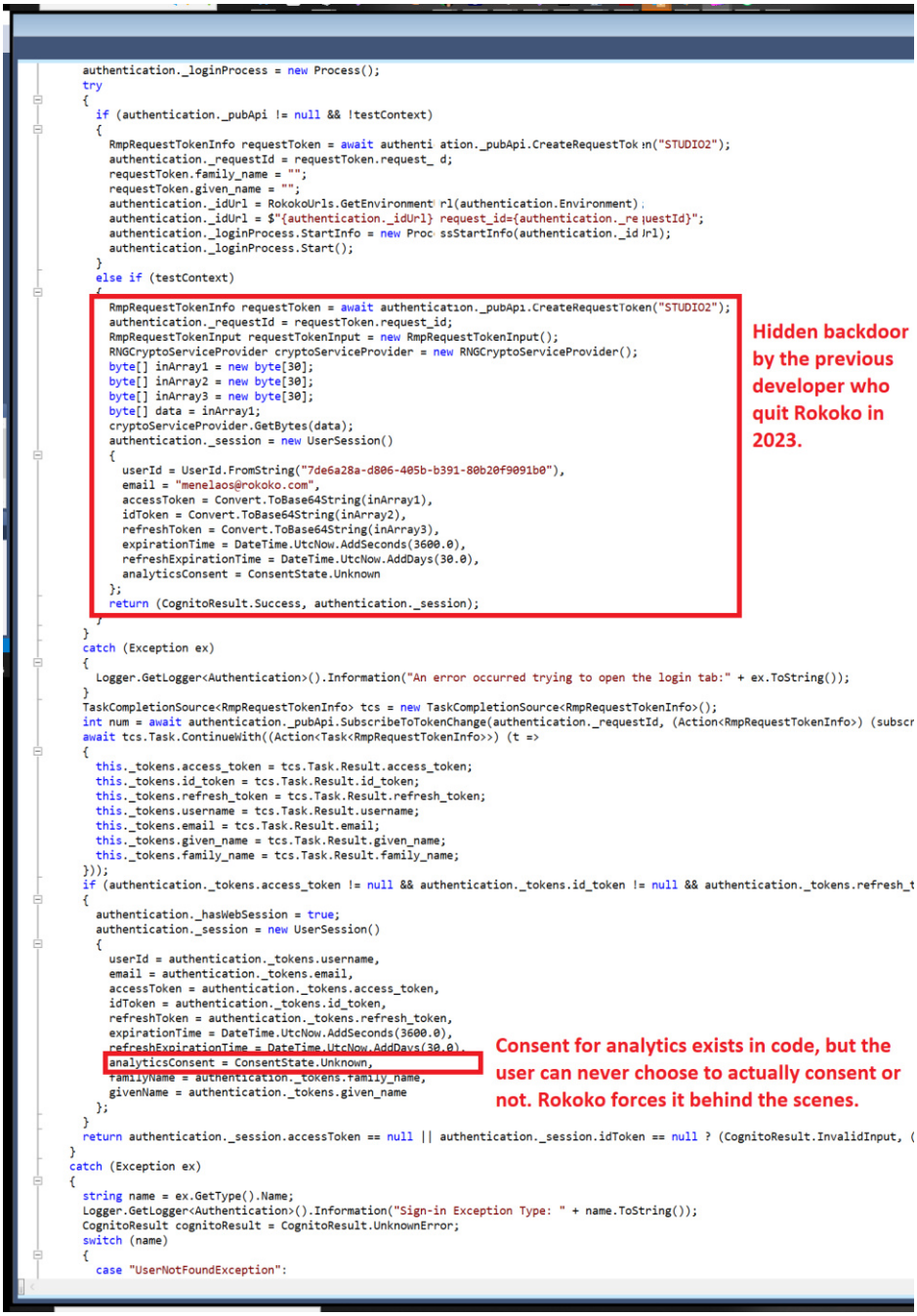


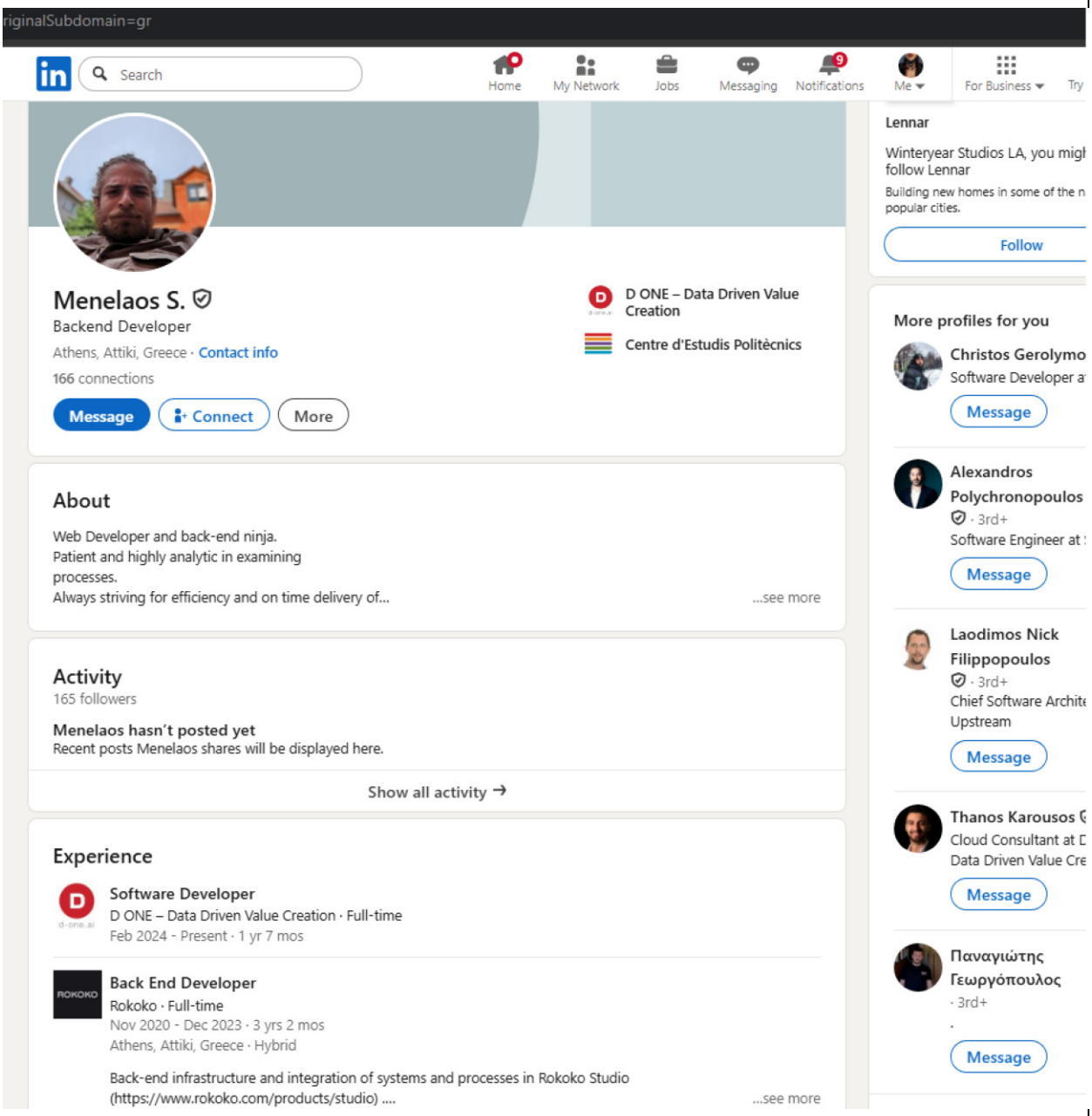
Top up your wallet (For purchasing Motion Library assets)

In order to purchase Motion Library assets you need to have available funds in your team balance. This portion of our video tutorial walks you

EXHIBIT 41

Defendant's code contains a hardcoded authentication bypass, inserted by a former employee that has been present for over three years.



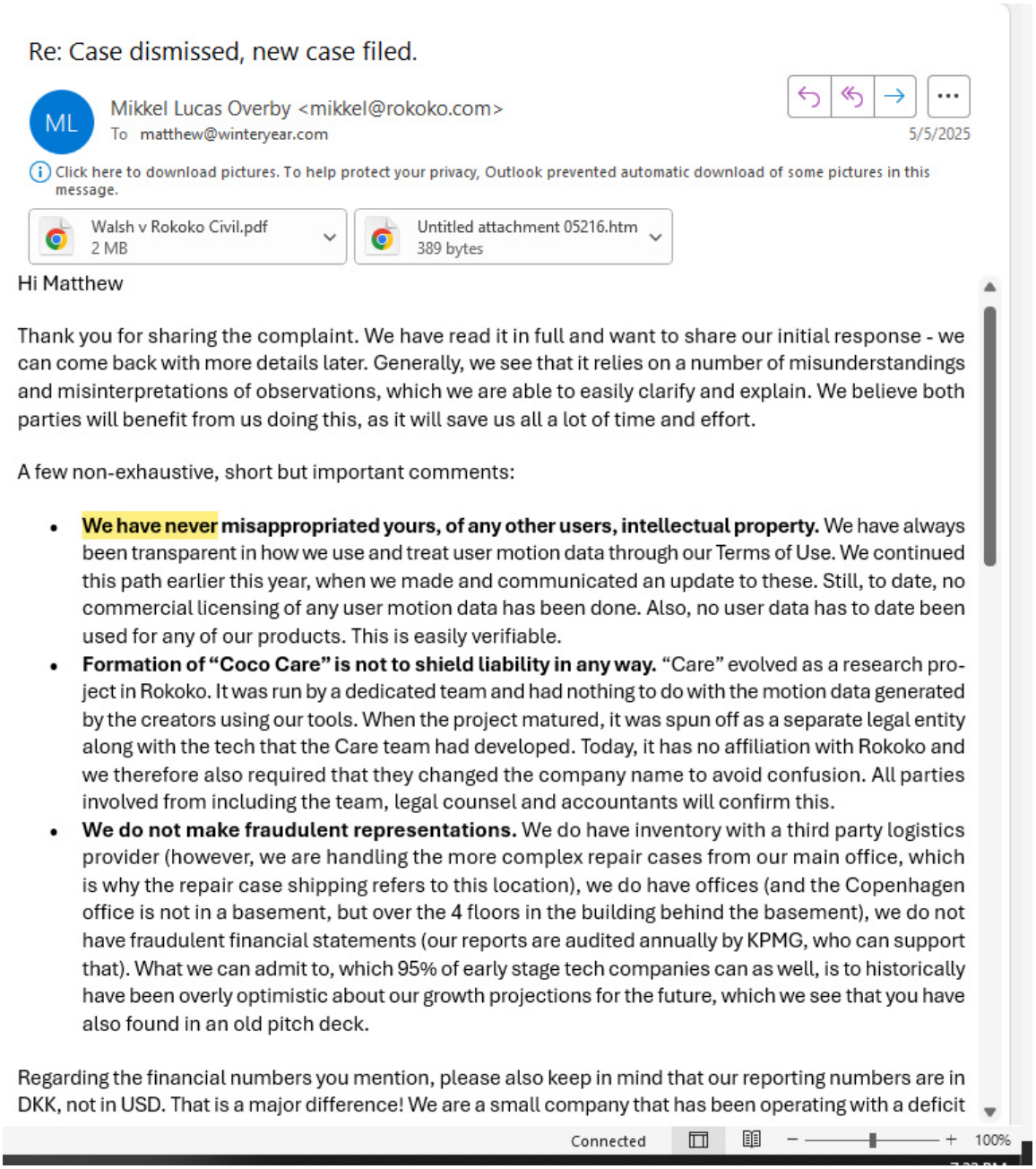

riginalSubdomain=gr
Search
Home
My Network
Jobs
Messaging
Notifications
Me
For Business
Try
Menelaos S.
Backend Developer
Athens, Attiki, Greece · Contact info
166 connections
Message
Connect
More
D ONE – Data Driven Value Creation
Centre d'Estudis Politècnics
About
Web Developer and back-end ninja.
Patient and highly analytic in examining processes.
Always striving for efficiency and on time delivery of...
...see more
Activity
165 followers
Menelaos hasn't posted yet
Recent posts Menelaos shares will be displayed here.
Show all activity →
Experience
Software Developer
D ONE – Data Driven Value Creation · Full-time
Feb 2024 - Present · 1 yr 7 mos
Back End Developer
Rokoko · Full-time
Nov 2020 - Dec 2023 · 3 yrs 2 mos
Athens, Attiki, Greece · Hybrid
Back-end infrastructure and integration of systems and processes in Rokoko Studio (https://www.rokoko.com/products/studio) ....
...see more
Lennar
Winteryear Studios LA, you migh follow Lennar
Building new homes in some of the n popular cities.
Follow
More profiles for you
Christos Gerolymo
Software Developer a
Message
Alexandros Polychronopoulos
· 3rd+
Software Engineer at
Message
Laodimos Nick Filippopoulos
· 3rd+
Chief Software Archite
Upstream
Message
Thanos Karousos
Cloud Consultant at D
Data Driven Value Cre
Message
Παναγιώτης Γεωργόπουλος
· 3rd+
Message

730

731

EXHIBIT 42

739 After confrontation, Defendant Overby backtracked: ["We have never
740 misappropriated yours… We have always been transparent… through our Terms
741 of Use."]



Re: Case dismissed, new case filed.

ML Mikkel Lucas Overby <mikkel@rokoko.com>
To matthew@winteryear.com
5/5/2025

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Walsh v Rokoko Civil.pdf
2 MB

Untitled attachment 05216.htm
389 bytes

Hi Matthew

Thank you for sharing the complaint. We have read it in full and want to share our initial response - we can come back with more details later. Generally, we see that it relies on a number of misunderstandings and misinterpretations of observations, which we are able to easily clarify and explain. We believe both parties will benefit from us doing this, as it will save us all a lot of time and effort.

A few non-exhaustive, short but important comments:

- **We have never misappropriated yours, of any other users, intellectual property.** We have always been transparent in how we use and treat user motion data through our Terms of Use. We continued this path earlier this year, when we made and communicated an update to these. Still, to date, no commercial licensing of any user motion data has been done. Also, no user data has to date been used for any of our products. This is easily verifiable.
- **Formation of "Coco Care" is not to shield liability in any way.** "Care" evolved as a research project in Rokoko. It was run by a dedicated team and had nothing to do with the motion data generated by the creators using our tools. When the project matured, it was spun off as a separate legal entity along with the tech that the Care team had developed. Today, it has no affiliation with Rokoko and we therefore also required that they changed the company name to avoid confusion. All parties involved from including the team, legal counsel and accountants will confirm this.
- **We do not make fraudulent representations.** We do have inventory with a third party logistics provider (however, we are handling the more complex repair cases from our main office, which is why the repair case shipping refers to this location), we do have offices (and the Copenhagen office is not in a basement, but over the 4 floors in the building behind the basement), we do not have fraudulent financial statements (our reports are audited annually by KPMG, who can support that). What we can admit to, which 95% of early stage tech companies can as well, is to historically have been overly optimistic about our growth projections for the future, which we see that you have also found in an old pitch deck.

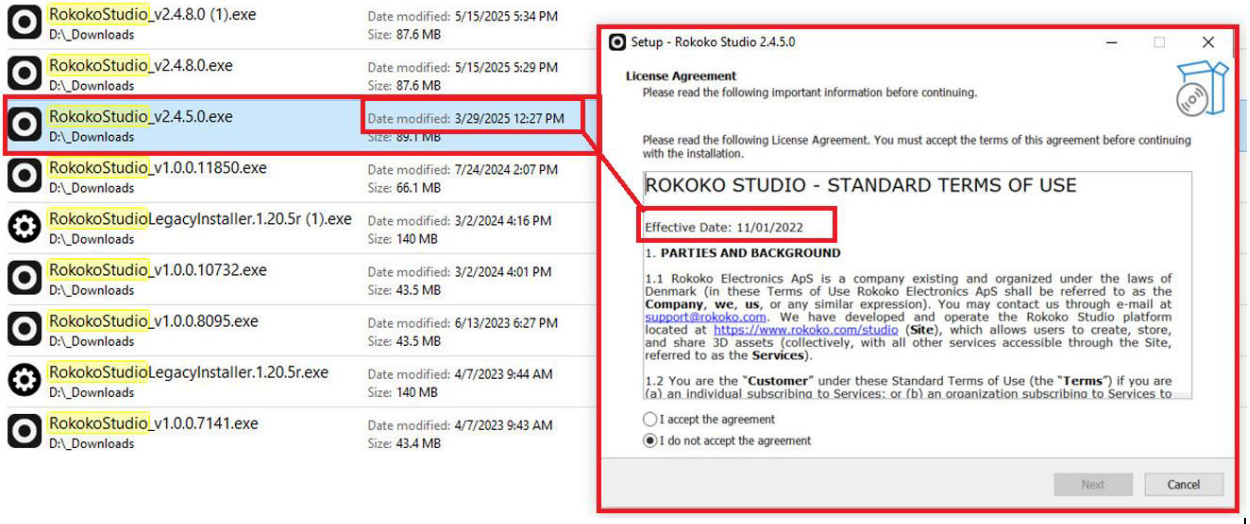
Regarding the financial numbers you mention, please also keep in mind that our reporting numbers are in DKK, not in USD. That is a major difference! We are a small company that has been operating with a deficit

Connected 100%

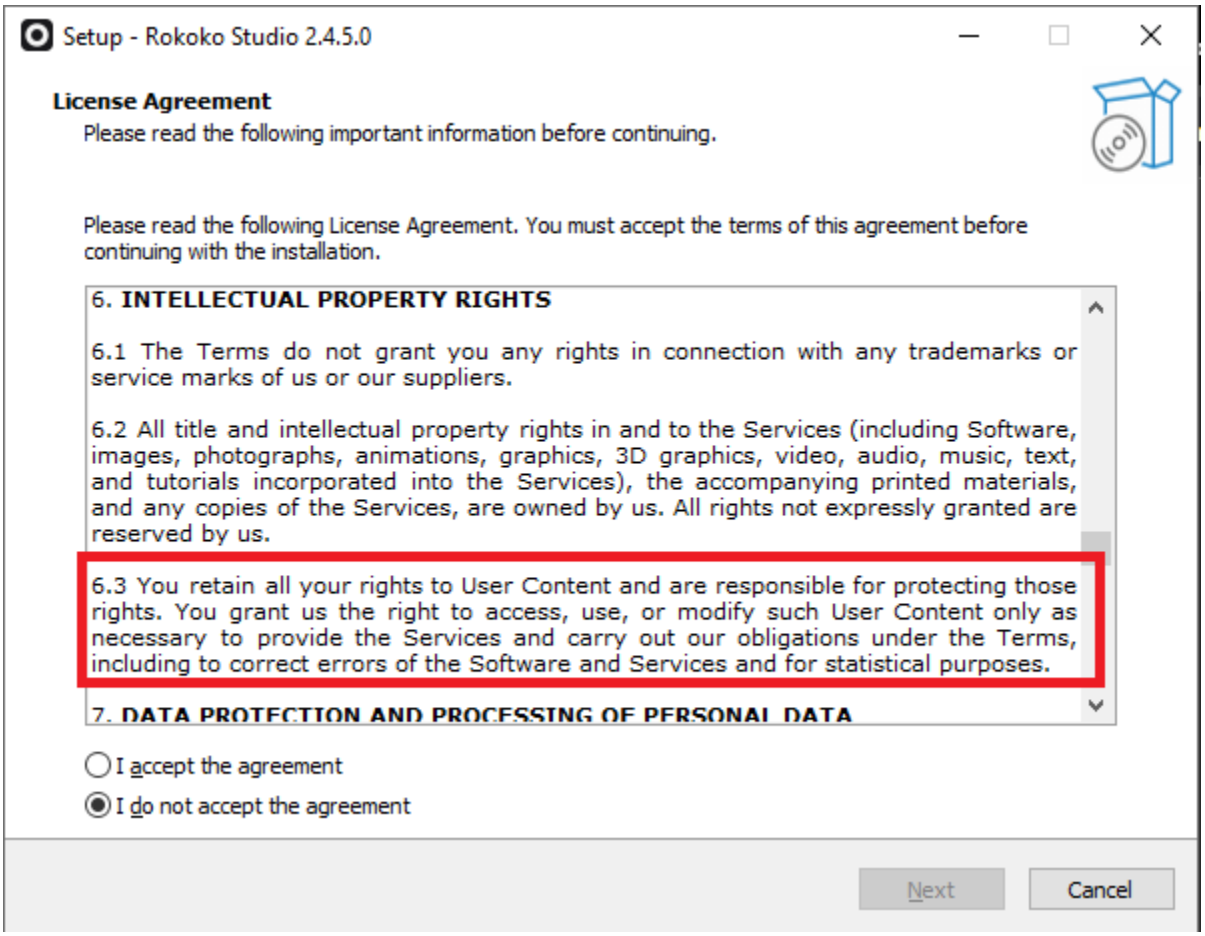
742

EXHIBIT 43

749 Defendant's terms before 2025 never allowed Rokoko any use of any intellectual
750 property
751



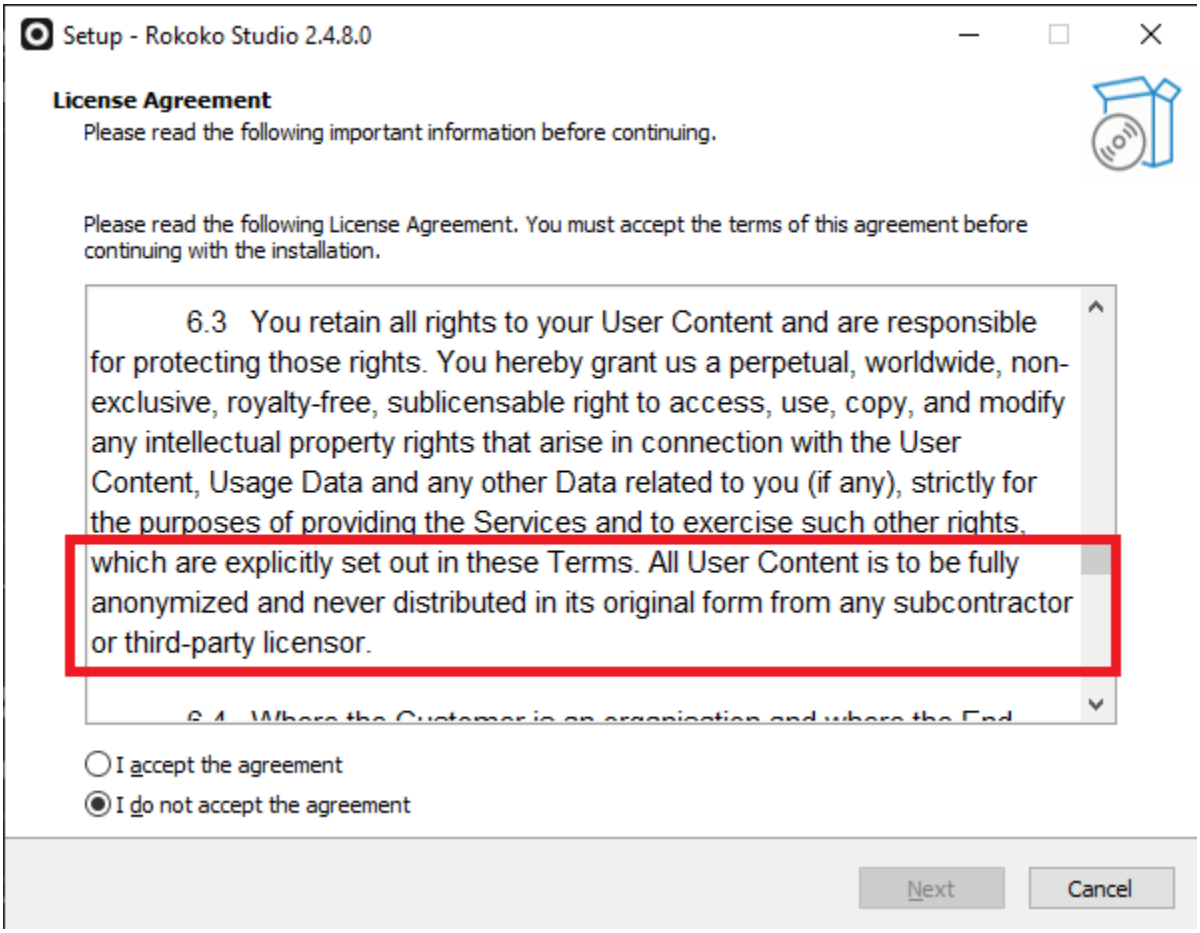
752



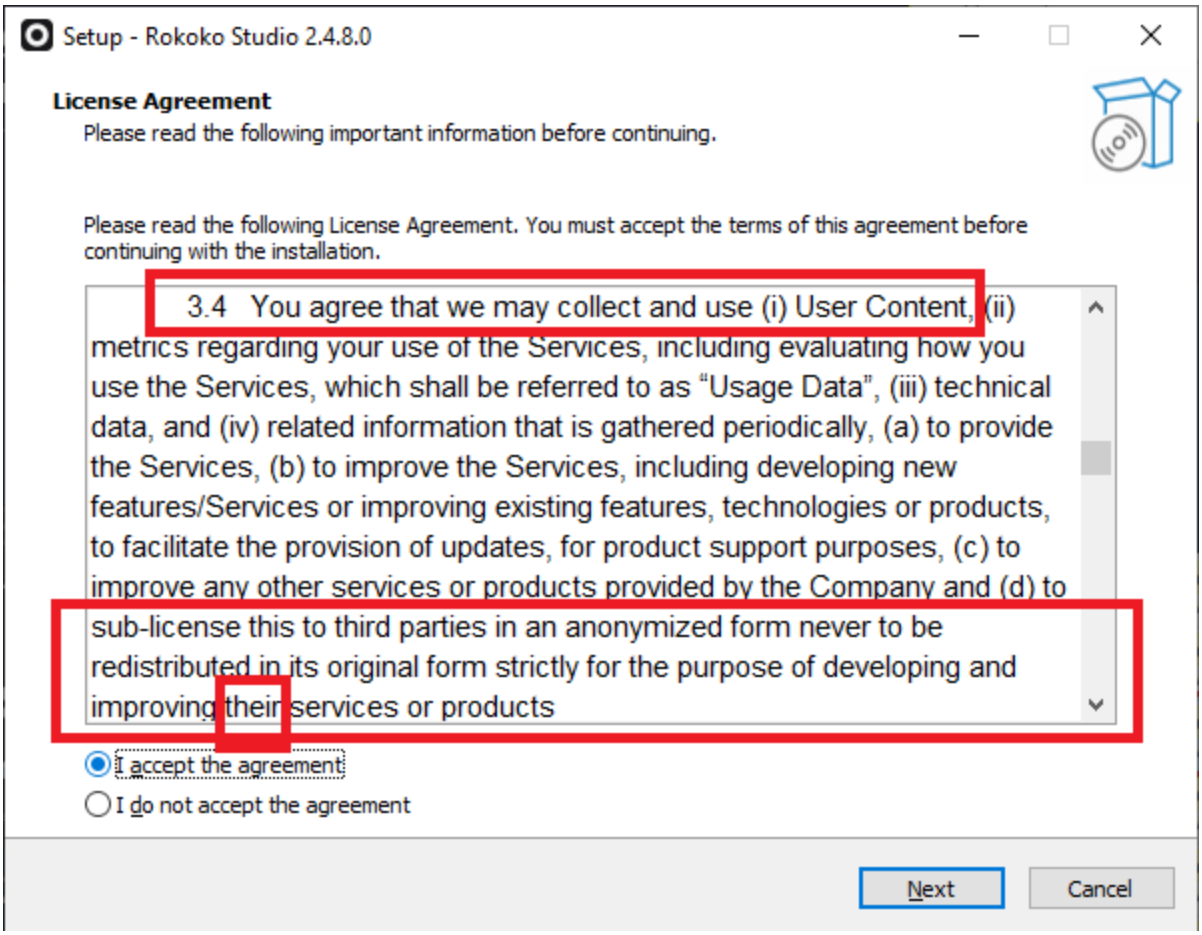
753

EXHIBIT 44

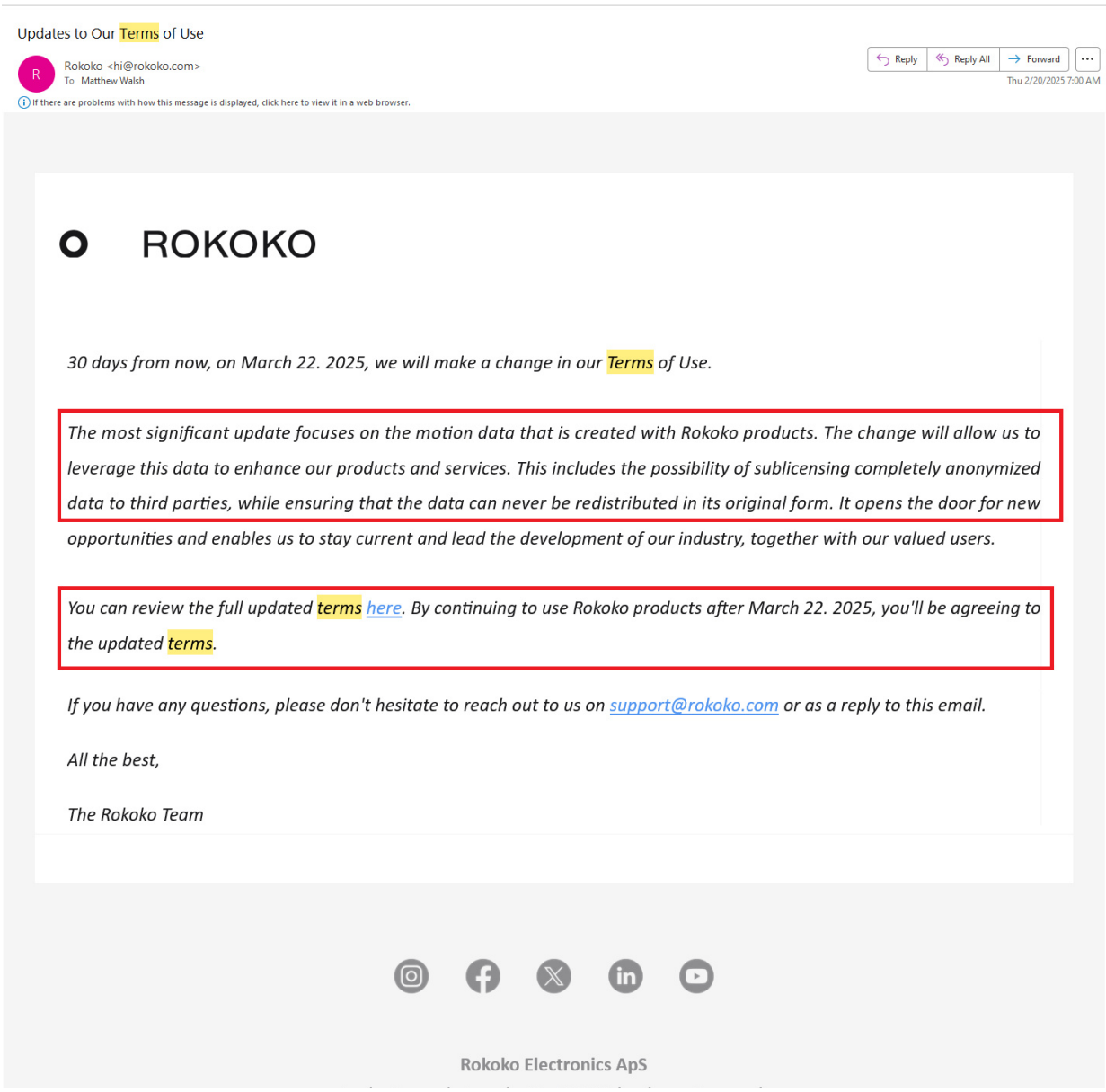
762 Defendant's retroactive terms now state they will strip CMI and sell your data to
763 third parties.
764



765


Setup - Rokoko Studio 2.4.8.0
License Agreement
Please read the following important information before continuing.
Please read the following License Agreement. You must accept the terms of this agreement before continuing with the installation.
3.4 You agree that we may collect and use (i) User Content, (ii) metrics regarding your use of the Services, including evaluating how you use the Services, which shall be referred to as "Usage Data", (iii) technical data, and (iv) related information that is gathered periodically, (a) to provide the Services, (b) to improve the Services, including developing new features/Services or improving existing features, technologies or products, to facilitate the provision of updates, for product support purposes, (c) to improve any other services or products provided by the Company and (d) to sub-license this to third parties in an anonymized form never to be redistributed in its original form strictly for the purpose of developing and improving their services or products
I accept the agreement
I do not accept the agreement
Next
Cancel

766



Updates to Our Terms of Use

Rokoko <hi@rokoko.com>
To Matthew Walsh

Reply | Reply All | Forward

Thu 2/20/2025 7:00 AM

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

ROKOKO

30 days from now, on March 22. 2025, we will make a change in our Terms of Use.

The most significant update focuses on the motion data that is created with Rokoko products. The change will allow us to leverage this data to enhance our products and services. This includes the possibility of sublicensing completely anonymized data to third parties, while ensuring that the data can never be redistributed in its original form. It opens the door for new opportunities and enables us to stay current and lead the development of our industry, together with our valued users.

You can review the full updated terms here. By continuing to use Rokoko products after March 22. 2025, you'll be agreeing to the updated terms.

If you have any questions, please don't hesitate to reach out to us on support@rokoko.com or as a reply to this email.

All the best,

The Rokoko Team

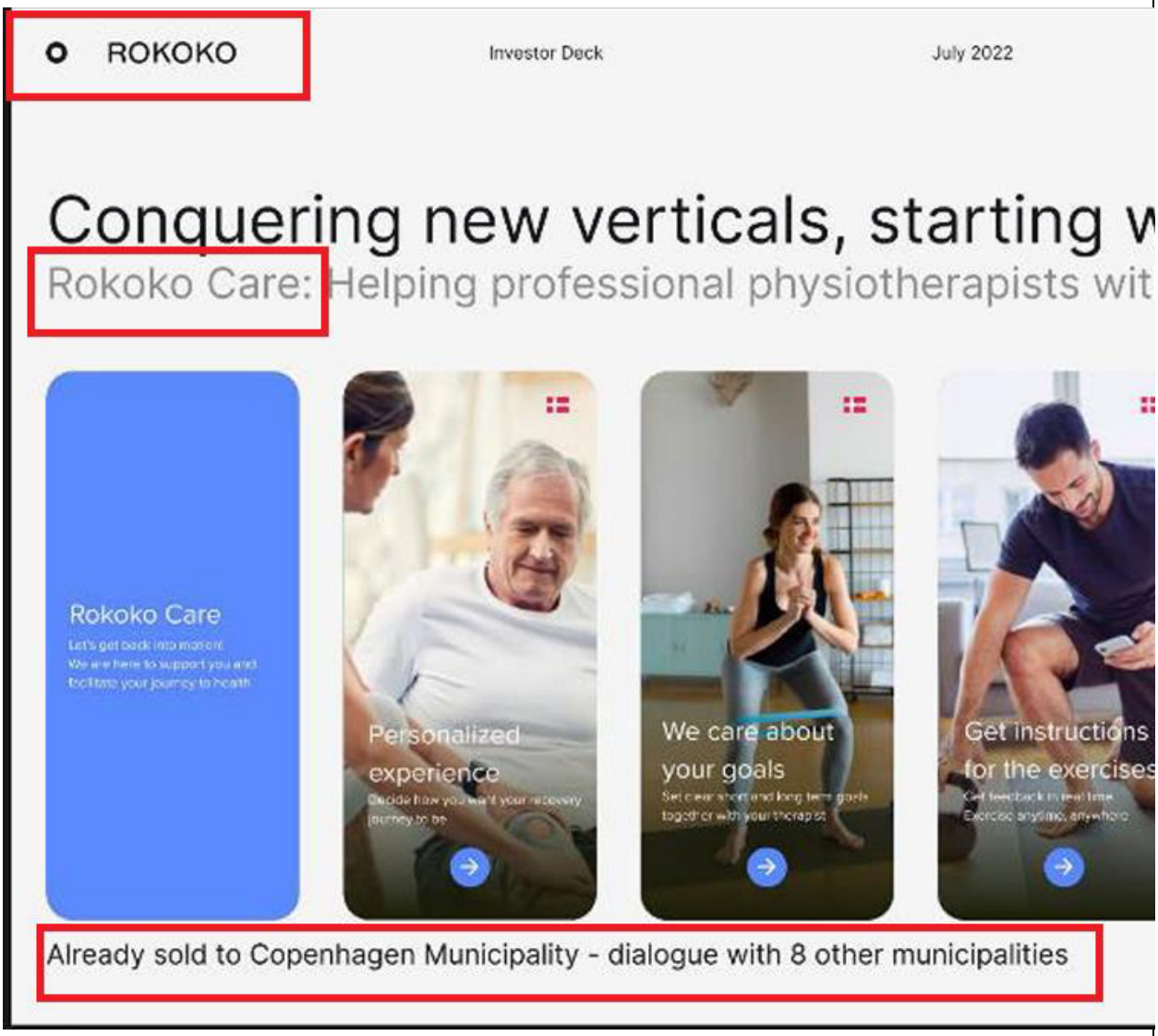
Rokoko Electronics ApS

767

768

EXHIBIT 45

Defendant says in 2022 they already had sold Rokoko Care to 8 municipalities. In 2024, they sold 22% to Trifork, who admitted it came from the Rokoko data.



781 Trifork:

About Rokoko Care (rokokocare.com)
Rokoko Care is a health tech startup offering a digital physiotherapy solution of the same name. This solution operates through a web portal for physiotherapists and an app for citizens. Physiotherapists can assign rehabilitation programs that citizens can easily access and follow at home. Rokoko Care's computer vision technology allows citizens to train in front of their phone, with the app live-tracking their movements. This technology enhances training completion rates, enabling physiotherapists to monitor progress remotely and support their expertise with data. Based in Copenhagen, Rokoko Care evolved from Rokoko, a tech company with a decade of experience in motion capture and customers in over 100 countries.

Questions should be directed to: CEO, Matias Søndergaard, +45 60 60 50 14, matias@rokokocare.com

782
783
784 Rokoko Care EULA:
785

End User means a natural person who, as a user, uses the System as a patient or otherwise to receive a course of treatment, with or without affiliation with a Healthcare Professional. **Healthcare Professional**

s://web.archive.org/web/20241217190024/https://www.rokokocare.com/brugervilkar 1/5

5/25, 11:21 AM Terms of Use

means an organization, entity or person that provides healthcare services to an End User and that can assign training exercises and programs and access personal data about End Users who have expressly given their consent to this. **Updates** means new versions of the System that Rokoko may offer, including in the form of individual adjustments. **The System** means the software and applications developed by Rokoko regarding the Rokoko CARE solution, including Updates, which are covered by the license agreement that Rokoko has entered into with the Municipality, and which the End User and the Healthcare Professional are granted access to use in accordance with these terms .

786

JUNE 12, 2024 PARTNERSHIPS

Trifork invests in Rokoko Care to advance AI-based physiotherapy

Trifork invests in Rokoko Care to advance AI-based physiotherapy

Copenhagen, 12 June 2024 – Trifork and Rokoko Care enter into a strategic partnership to offer digital physiotherapy treatment in patients' own home. With this strategic partnership and an investment that gives Trifork 22% ownership of Rokoko Care, both companies will work towards a shared vision of improving healthcare and quality of life through advanced technology.

This partnership furthers Trifork's and Rokoko Care's mission to address critical societal challenges with innovative solutions on both national and international levels. Trifork's over 20 years of experience in health IT, combined with Rokoko Care's pioneering computer vision technology—which tracks users' movements in real time via their phone cameras—ensures that Rokoko Care's digital physiotherapy platform can be accessible to everyone in need.

Karen Skjerbæk Jørgensen, CCO for Trifork Digital Health, states:
"With an aging population and increasing demands on a strained healthcare system, there is an urgent need for digital home treatment solutions. Rokoko Care's platform complements Trifork's portfolio of health solutions, which support home-based treatment and the entire patient journey. A significant technical advantage is that Rokoko Care's computer vision technology operates on citizens' own devices."

For over two decades, Trifork has developed and implemented innovative digital health solutions in Denmark, including the Shared Medication Record, the My Doctor app, and the Telma solution. This extensive experience will enable Rokoko Care to elevate their physiotherapy solution to the highest level. Rokoko Care brings deep insights into physiotherapy, along with advanced motion capture technologies, combined with computer vision and AI, which can introduce new opportunities to Trifork Digital Health.

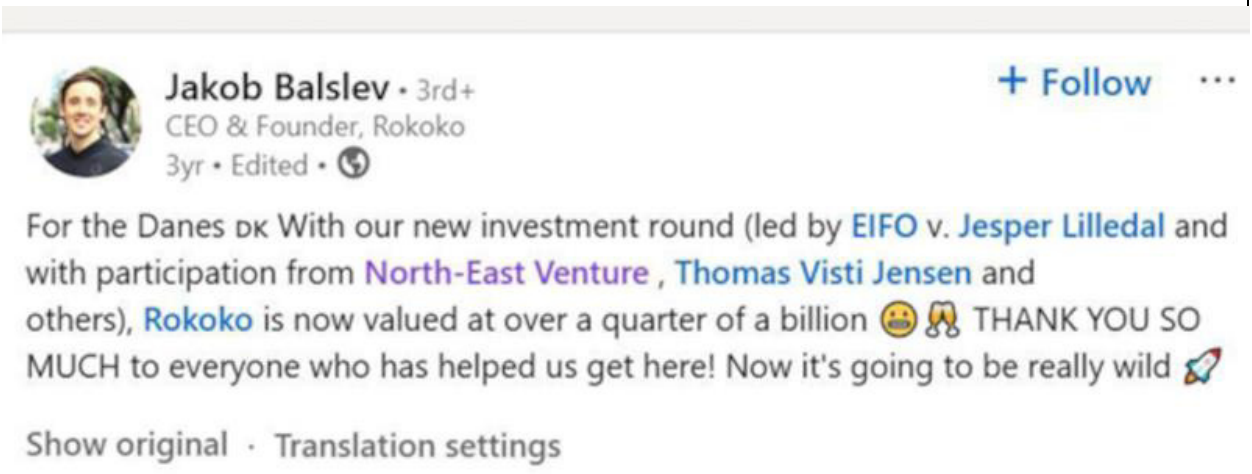
Jesper Grankær Carøe, CEO Trifork Digital Health, adds:
"Developing and implementing digital solutions that meet the demands of both the public and citizens is always challenging. Our extensive experience with numerous solutions for municipalities, regions, and agencies will help Rokoko Care maximize the value of their innovative platform."

Jakob Fisker, CPO and co-founder of Rokoko Care, states:
"Rokoko Care introduces a valuable tool for clinical practice that facilitates physiotherapeutic rehabilitation for patients in their own homes without compromising healthcare quality. This solution provides objective data, enabling physiotherapists to personalize treatments for each patient, thereby enhancing the quality, flexibility, and effectiveness of care. Consequently, treatments can be conducted more frequently wherever the patient is—at home, at work, or even at a vacation home. This level of flexibility is highly desired by patients."

Matias Søndergaard, CEO and co-founder of Rokoko Care, adds:
"Although we are a relatively young company, the timing of our solution is perfect. We believe that

EXHIBIT 46

Defendant stated in 2023 they are worth a quarter of a billion dollars, the same year they were prior insolvent about $2.4M USD.



Jakob Balslev • 3rd+
CEO & Founder, Rokoko
3yr • Edited •

+ Follow ···

For the Danes DK With our new investment round (led by EIFO v. Jesper Lilledal and with participation from North-East Venture , Thomas Visti Jensen and others), Rokoko is now valued at over a quarter of a billion 😀 THANK YOU SO MUCH to everyone who has helped us get here! Now it's going to be really wild 🚀

Show original · Translation settings

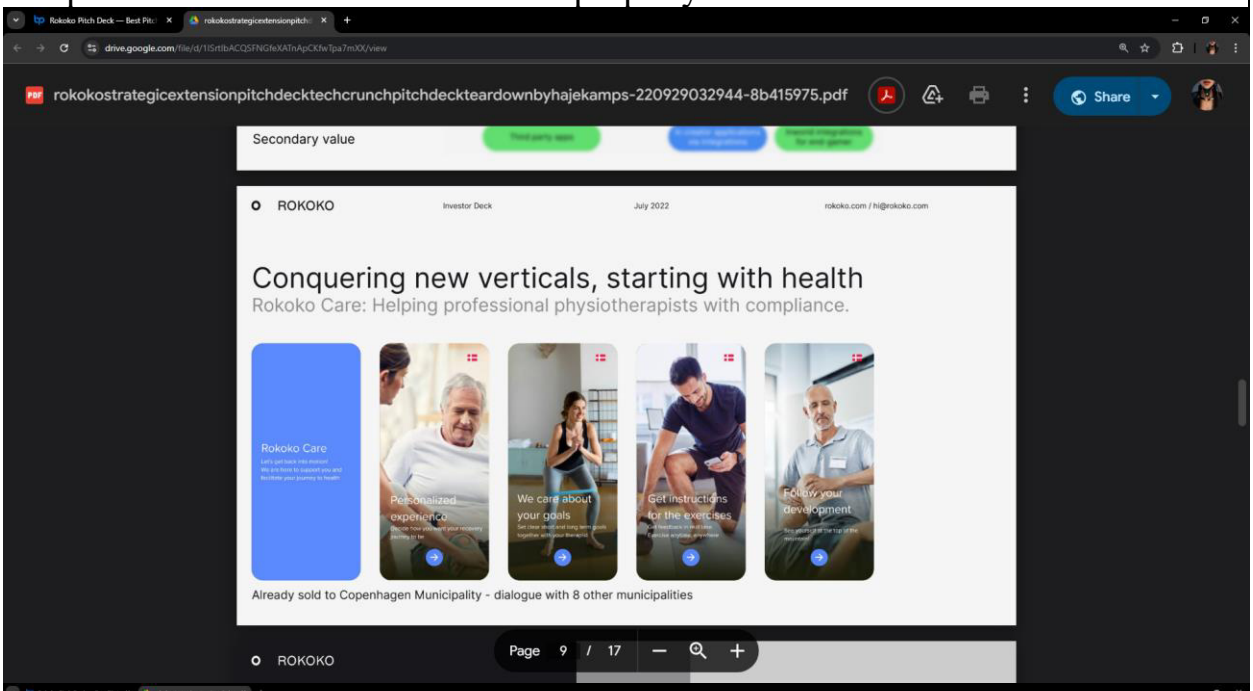
Financials below are in DKK not USD:

Income statement

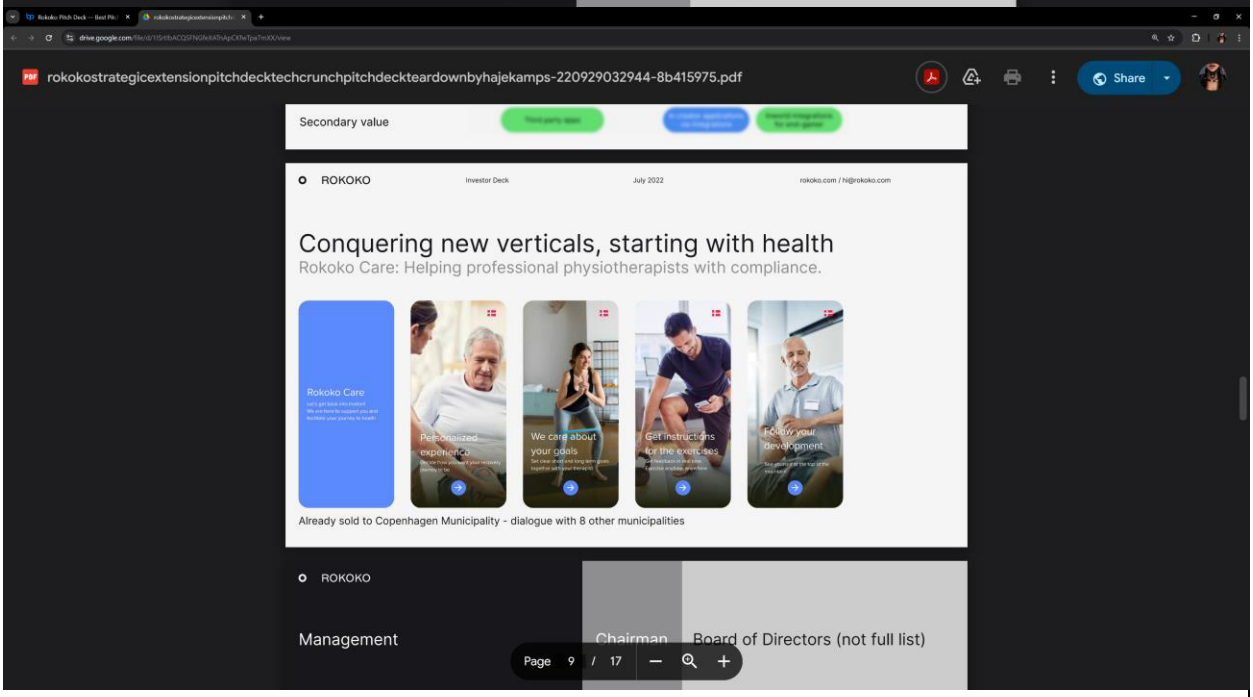
DKK	Note	2023	2
Gross profit		20,325,727	
Staff costs	2	-28,768,707	
Depreciation of property, plant and equipment and amortisation of intangible assets		-4,399,091	
Profit/loss before financial income and expenses		-12,842,071	
Other financial income		99,856	
Other financial expenses		-3,064,425	
Profit/loss before tax		-15,806,640	
Tax on profit/loss for the year	3	910,579	
Profit/loss for the year		-14,896,061	
Proposed profit appropriation/distribution of loss			
Reserve for development costs		6,468,773	
Retained earnings		-21,364,834	
		-14,896,061	

EXHIBIT 47

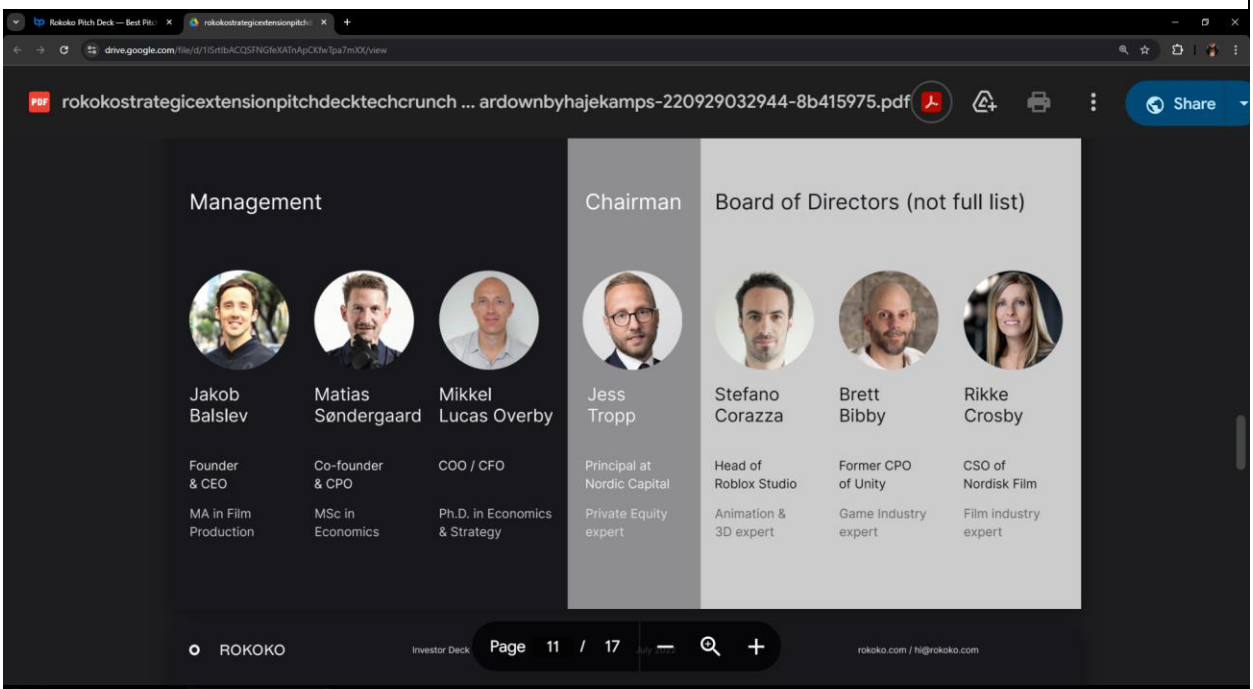
809 Defendant's pitch deck which clearly outlines their plan to misappropriate, infringe
810 and profit from Plaintiff's intellectual property.



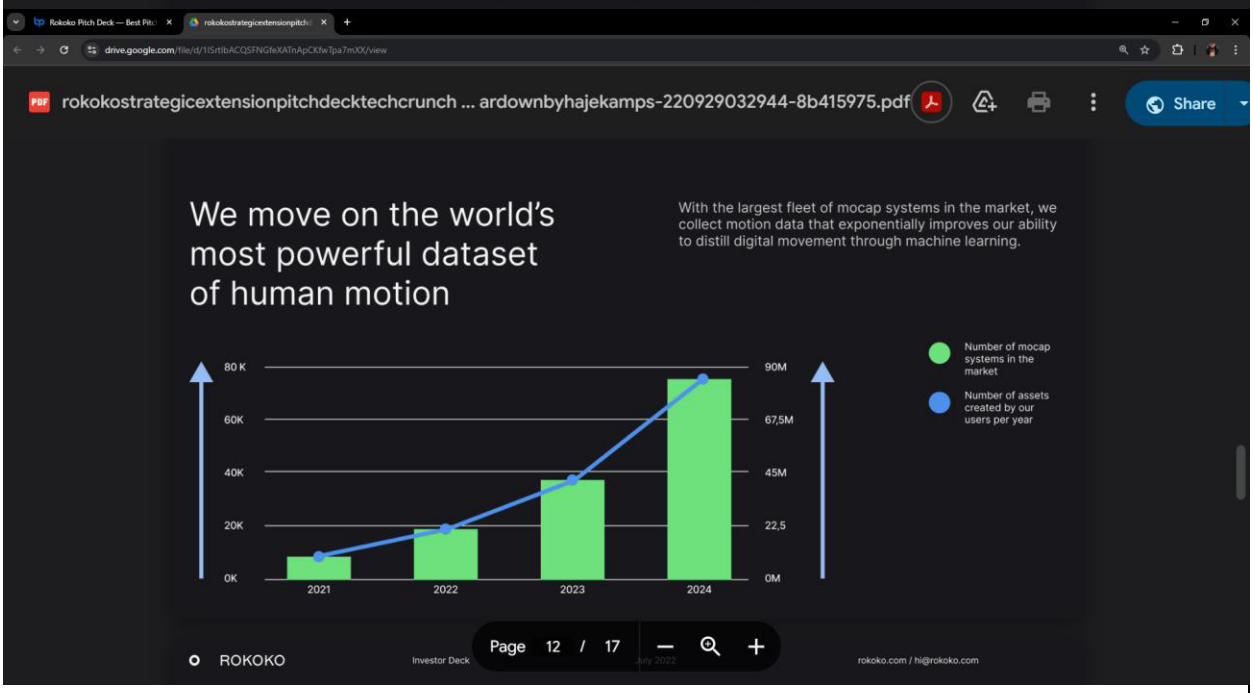
811



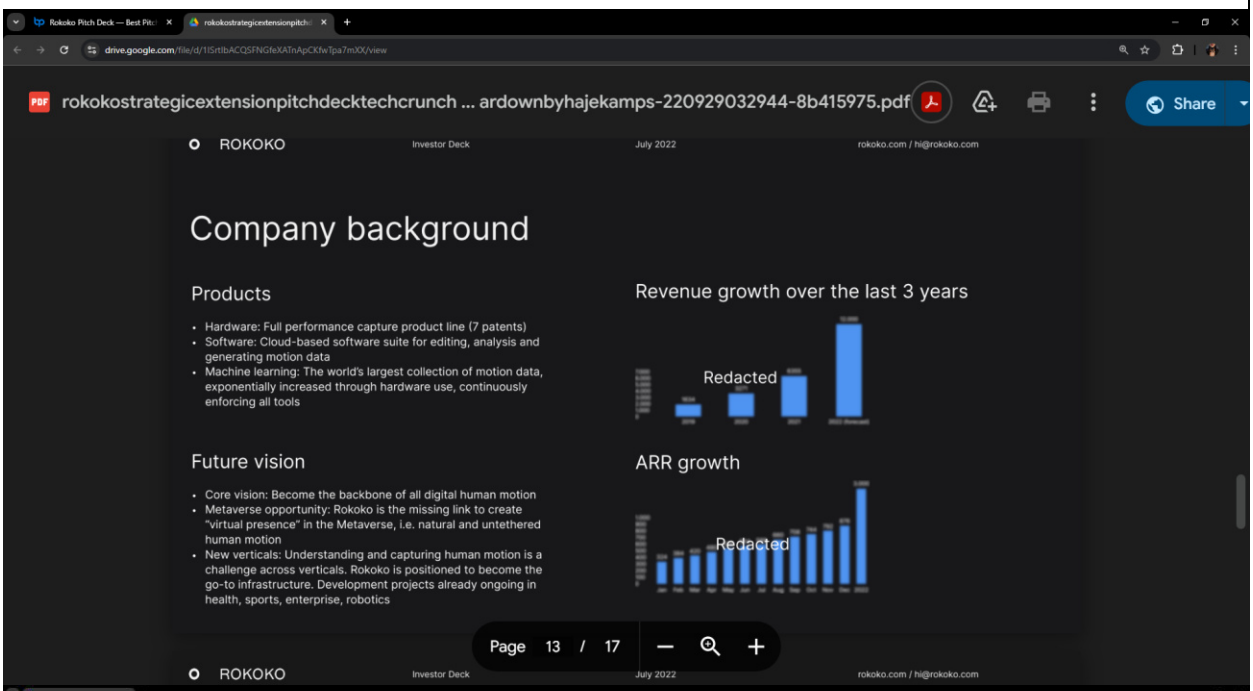
812


rokokostrategicextensionpitchdecktechcrunch ... ardownbyhajekamps-220929032944-8b415975.pdf
Share
Management
Chairman
Board of Directors (not full list)
Jakob Balslev
Founder & CEO
MA in Film Production
Matias Søndergaard
Co-founder & CPO
MSc in Economics
Mikkel Lucas Overby
COO / CFO
Ph.D. in Economics & Strategy
Jess Tropp
Principal at Nordic Capital
Private Equity expert
Stefano Corazza
Head of Roblox Studio
Animation & 3D expert
Brett Bibby
Former CPO of Unity
Game Industry expert
Rikke Crosby
CSO of Nordisk Film
Film industry expert
ROKOKO
Investor Deck
Page 11 / 17
rokoko.com / hi@rokoko.com

813


rokokostrategicextensionpitchdecktechcrunch ... ardownbyhajekamps-220929032944-8b415975.pdf
Share
We move on the world's most powerful dataset of human motion
With the largest fleet of mocap systems in the market, we collect motion data that exponentially improves our ability to distill digital movement through machine learning.
80 K
60K
40K
20K
0K
90M
67,5M
45M
22,5
0M
2021
2022
2023
2024
Number of mocap systems in the market
Number of assets created by our users per year
ROKOKO
Investor Deck
Page 12 / 17
rokoko.com / hi@rokoko.com

814


rokokostrategicextensionpitchdecktechcrunch ... ardownbyhajekamps-220929032944-8b415975.pdf
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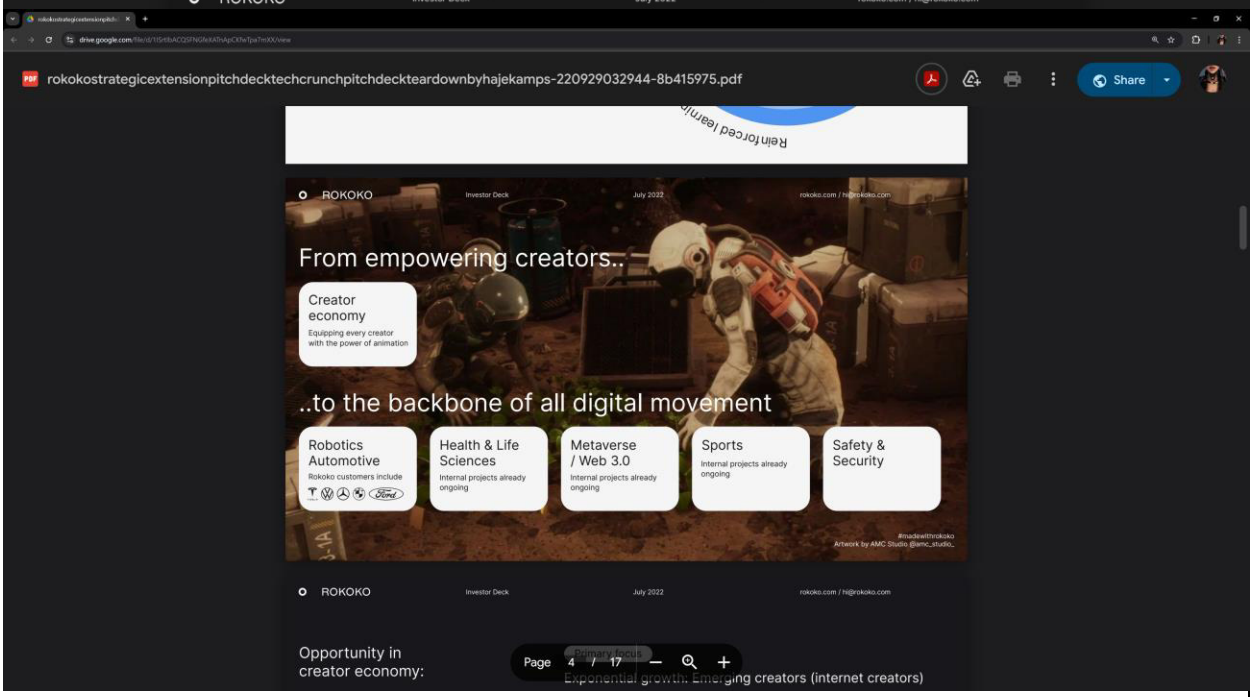
ROKOKO
Investor Deck
July 2022
rokoko.com / hi@rokoko.com
Company background
Products
Hardware: Full performance capture product line (7 patents)
Software: Cloud-based software suite for editing, analysis and generating motion data
Machine learning: The world's largest collection of motion data, exponentially increased through hardware use, continuously enforcing all tools
Revenue growth over the last 3 years
Redacted
Future vision
Core vision: Become the backbone of all digital human motion
Metaverse opportunity: Rokoko is the missing link to create "virtual presence" in the Metaverse, i.e. natural and untethered human motion
New verticals: Understanding and capturing human motion is a challenge across verticals. Rokoko is positioned to become the go-to infrastructure. Development projects already ongoing in health, sports, enterprise, robotics
ARR growth
Redacted
Page 13 / 17

815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ROKOKO
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July 2022
From empowering creators..
Creator economy
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..to the backbone of all digital movement
Robotics Automotive
Rokoko customers include
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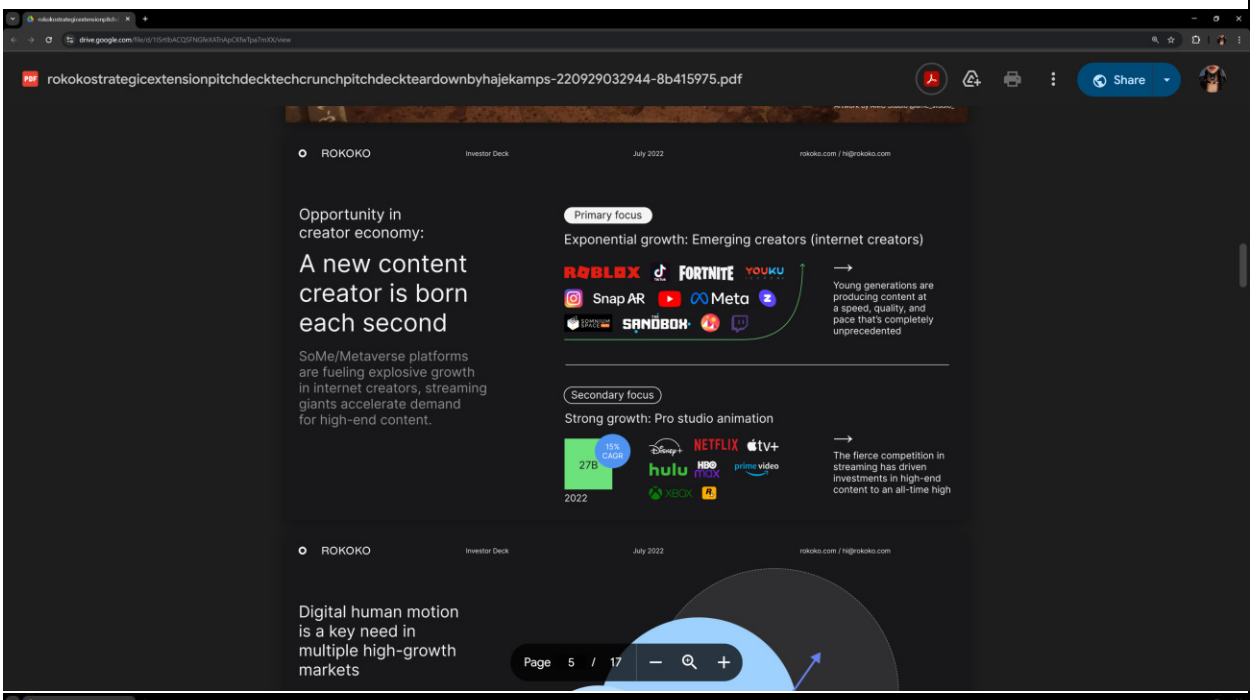
Internal projects already ongoing
Metaverse / Web 3.0
Internal projects already ongoing
Sports
Internal projects already ongoing
Safety & Security
Opportunity in creator economy:
Page 4 / 17
Exponential growth: Emerging creators (internet creators)

816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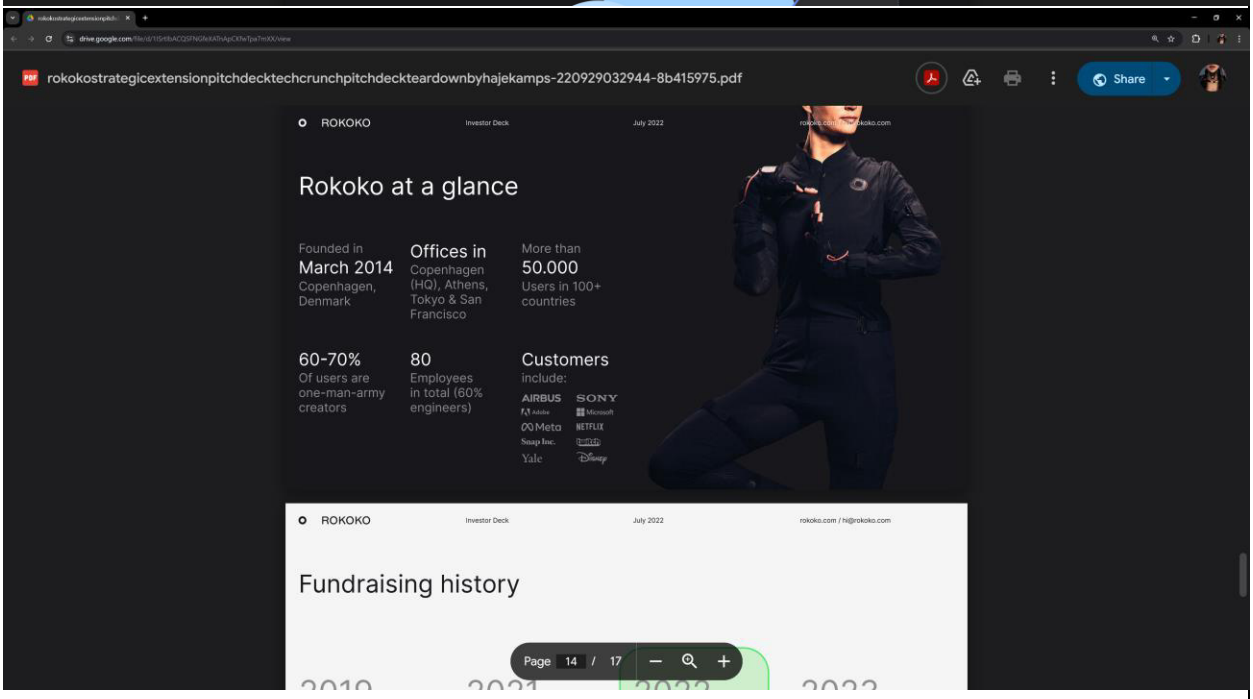
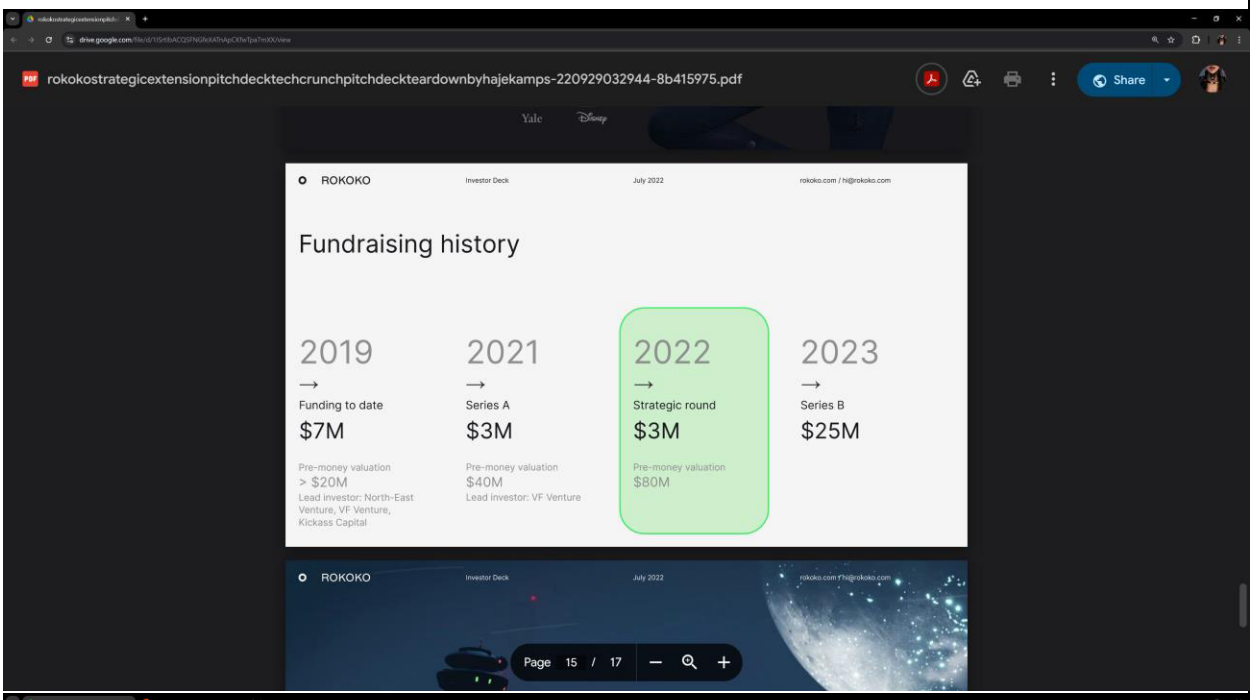
ROKOKO
Investor Deck
July 2022
Opportunity in creator economy:
A new content creator is born each second
SoMe/Metaverse platforms are fueling explosive growth in internet creators, streaming giants accelerate demand for high-end content.
Primary focus
Exponential growth: Emerging creators (internet creators)
ROBLOX
FORTNITE
YOUKU
Snap AR
Meta
SANDBOX
Young generations are producing content at a speed, quality, and pace that's completely unprecedented
Secondary focus
Strong growth: Pro studio animation
15% CAGR
27B
2022
NETFLIX
hulu
HBO max
prime video
The fierce competition in streaming has driven investments in high-end content to an all-time high
ROKOKO
Investor Deck
July 2022
Digital human motion is a key need in multiple high-growth markets
Page 5 / 17

817


rokokostrategicextensionpitchdecktechcrunchpitchdeckteardownbyhajekamps-220929032944-8b415975.pdf
Share
ROKOKO
Investor Deck
July 2022
Rokoko at a glance
Founded in March 2014 Copenhagen, Denmark
Offices in Copenhagen (HQ), Athens, Tokyo & San Francisco
More than 50.000 Users in 100+ countries
60-70% Of users are one-man-army creators
80 Employees in total (60% engineers)
Customers include:
AIRBUS
SONY
Meta
NETFLIX
Yale
ROKOKO
Investor Deck
July 2022
Fundraising history
Page 14 / 17

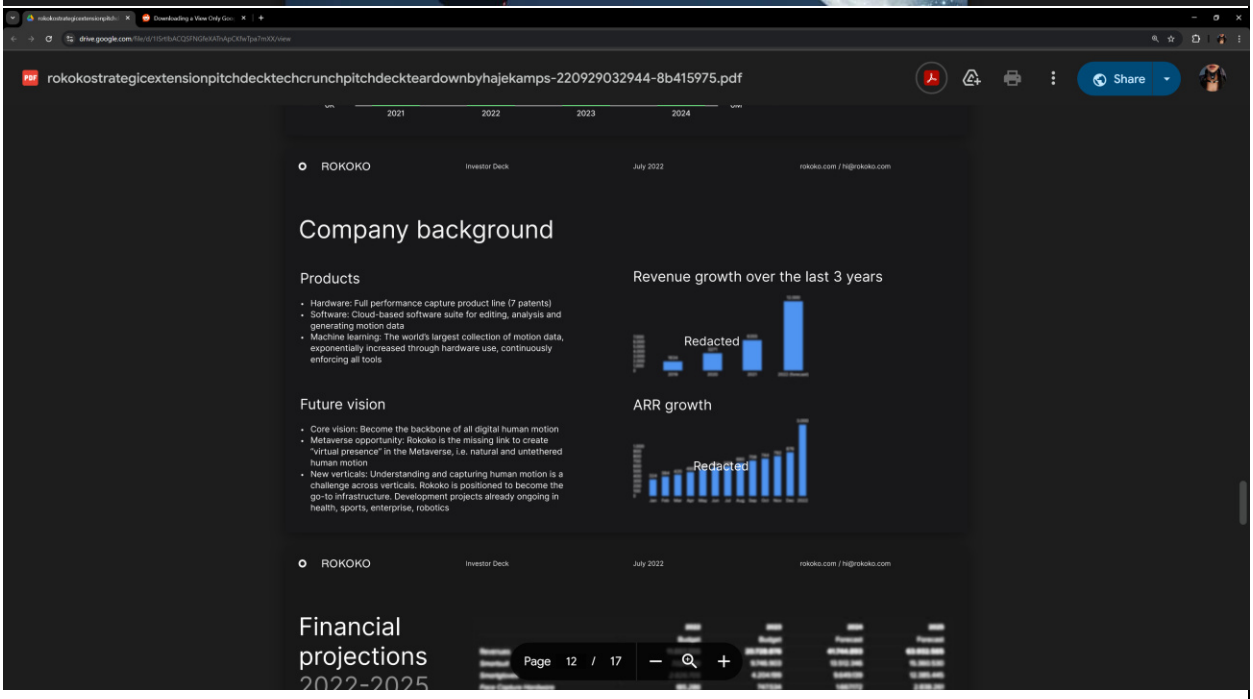
818

819


rokokostrategicextensionpitchdecktechcrunchpitchdeckteardownbyhajekamps-220929032944-8b415975.pdf
Share
ROKOKO
Investor Deck
July 2022
Fundraising history
2019
Funding to date
$7M
Pre-money valuation
> $20M
Lead investor: North-East Venture, VF Venture, Kickass Capital
2021
Series A
$3M
Pre-money valuation
$40M
Lead investor: VF Venture
2022
Strategic round
$3M
Pre-money valuation
$80M
2023
Series B
$25M
Page 15 / 17

820

821


rokokostrategicextensionpitchdecktechcrunchpitchdeckteardownbyhajekamps-220929032944-8b415975.pdf
Share
2021
2022
2023
2024
ROKOKO
Investor Deck
July 2022
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ARR growth
Redacted
ROKOKO
Investor Deck
July 2022
Financial projections
2022-2025
Page 12 / 17

822 Some of the falsities presented to investors:

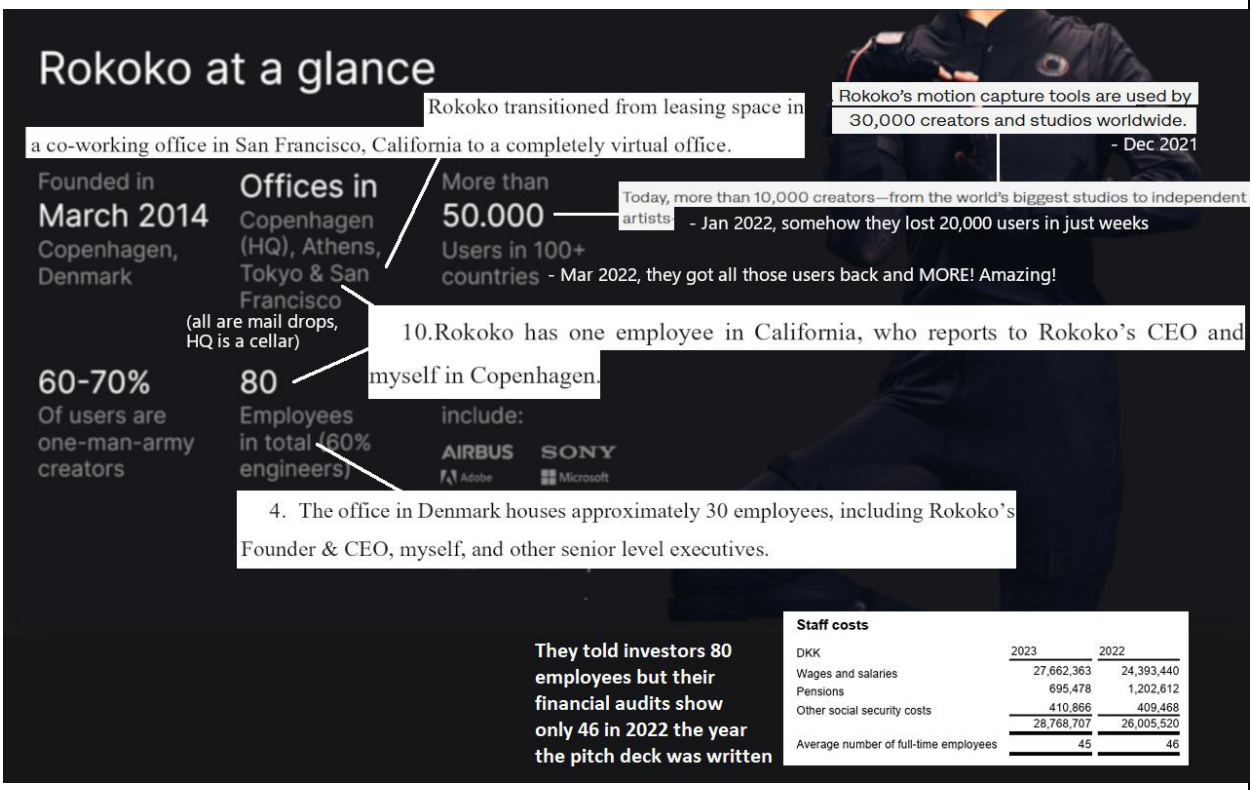

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EXHIBIT 48

Defendant engaged in the sale of Plaintiff's intellectual property *after* the lawsuit began and *after* copyright registration happened.

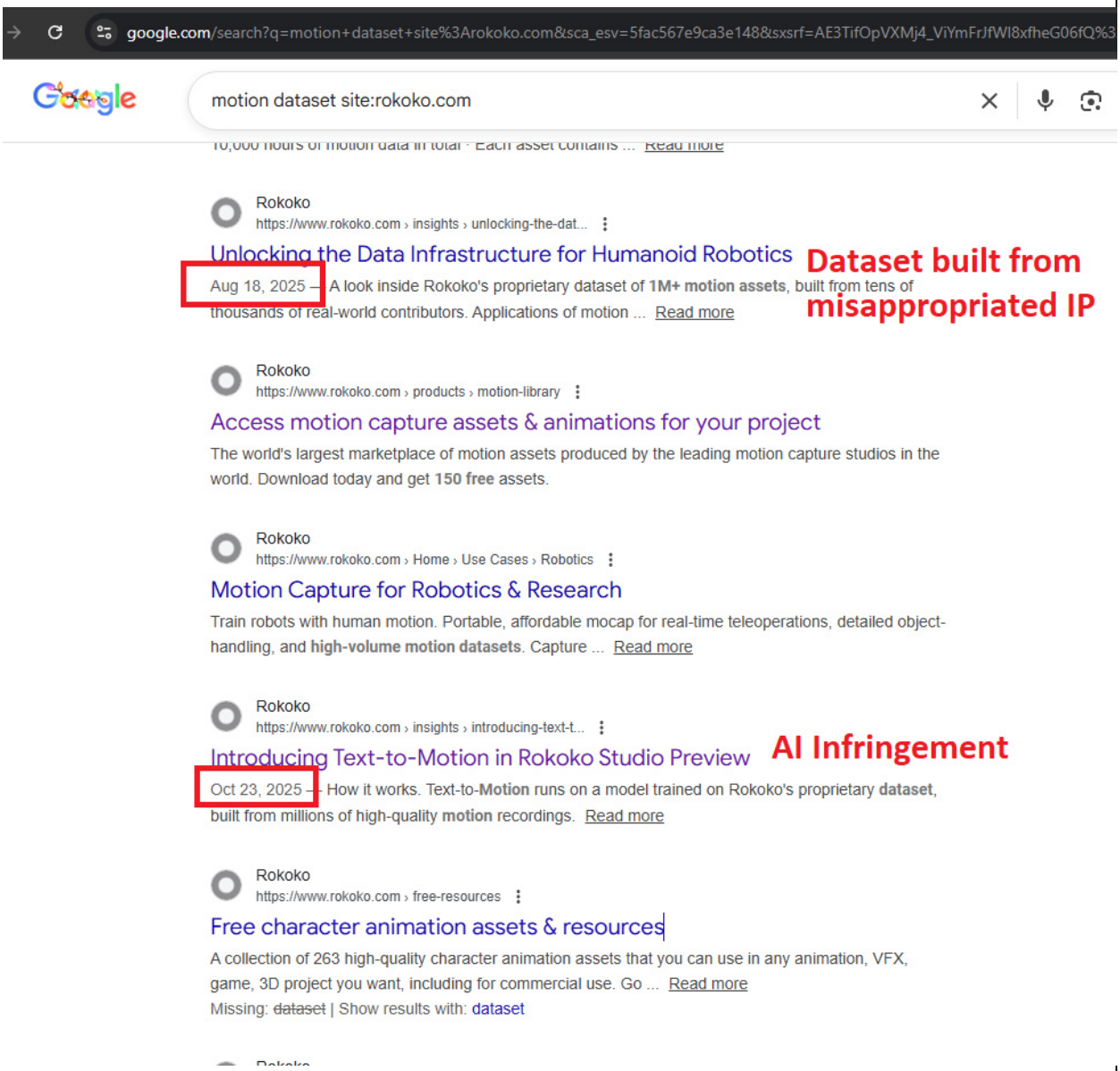
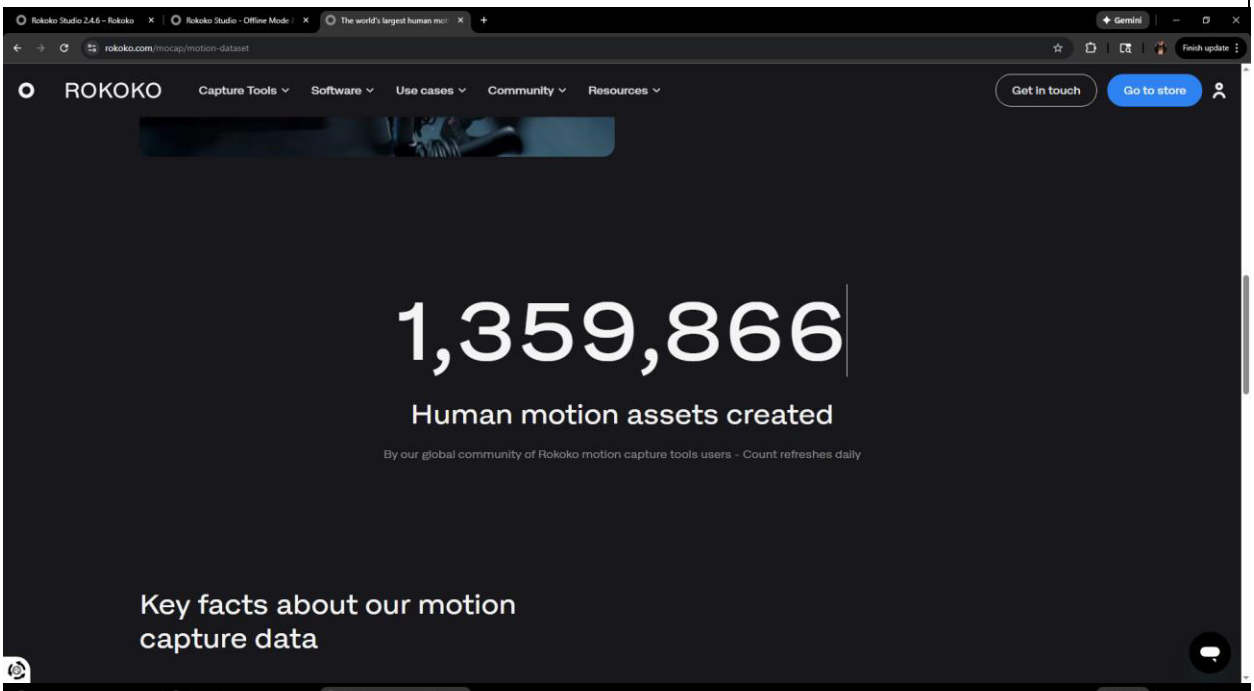
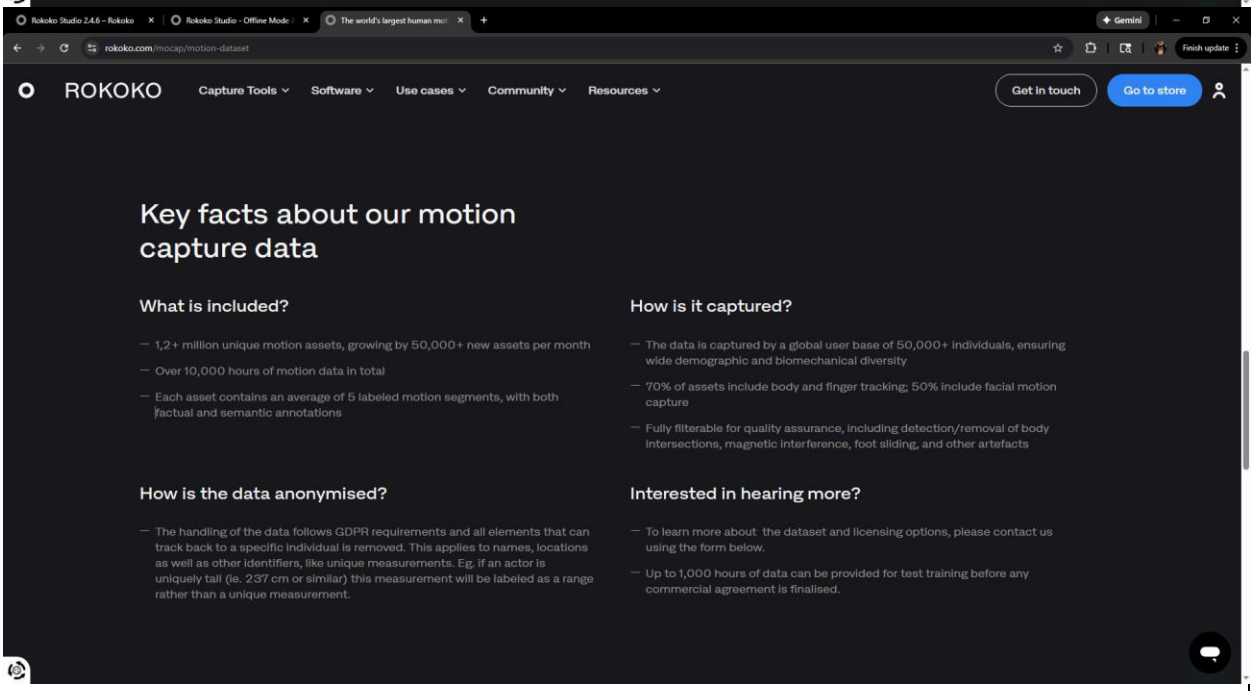


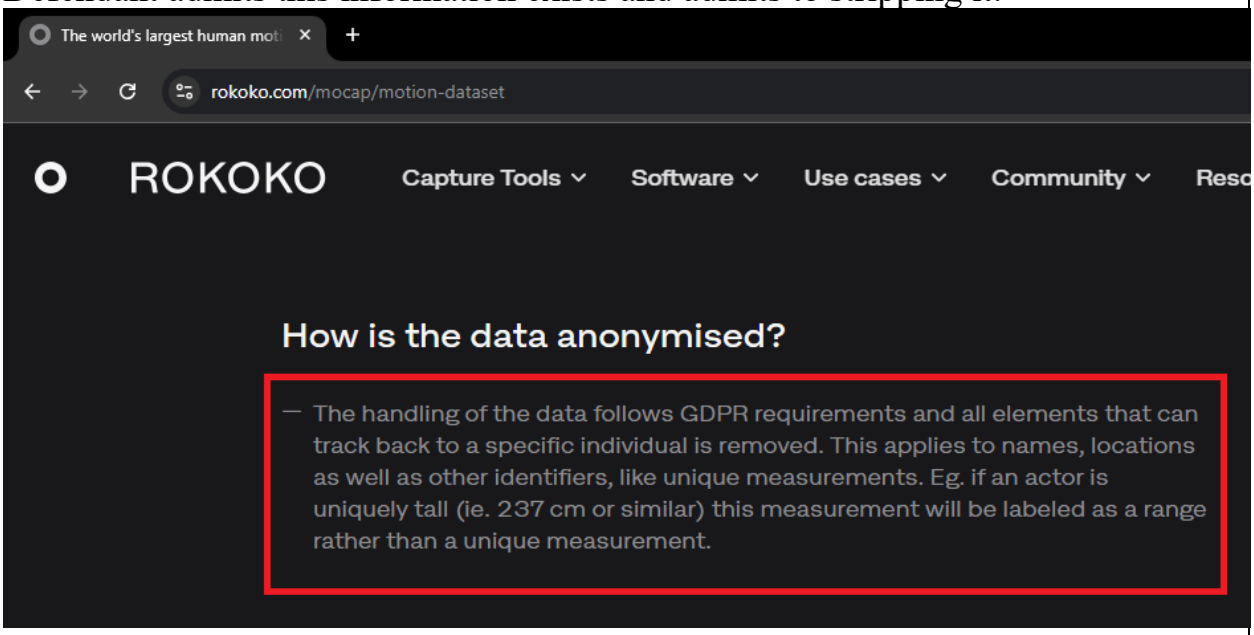
EXHIBIT 49

Defendant admits to collecting user animations, stripping CMI, commercial resale and more.





Defendant admits this information exists and admits to stripping it:



The terms imposed in 2025 grant retroactive rights, the right to override and modify someone elses rights, and admit to CMI stripping

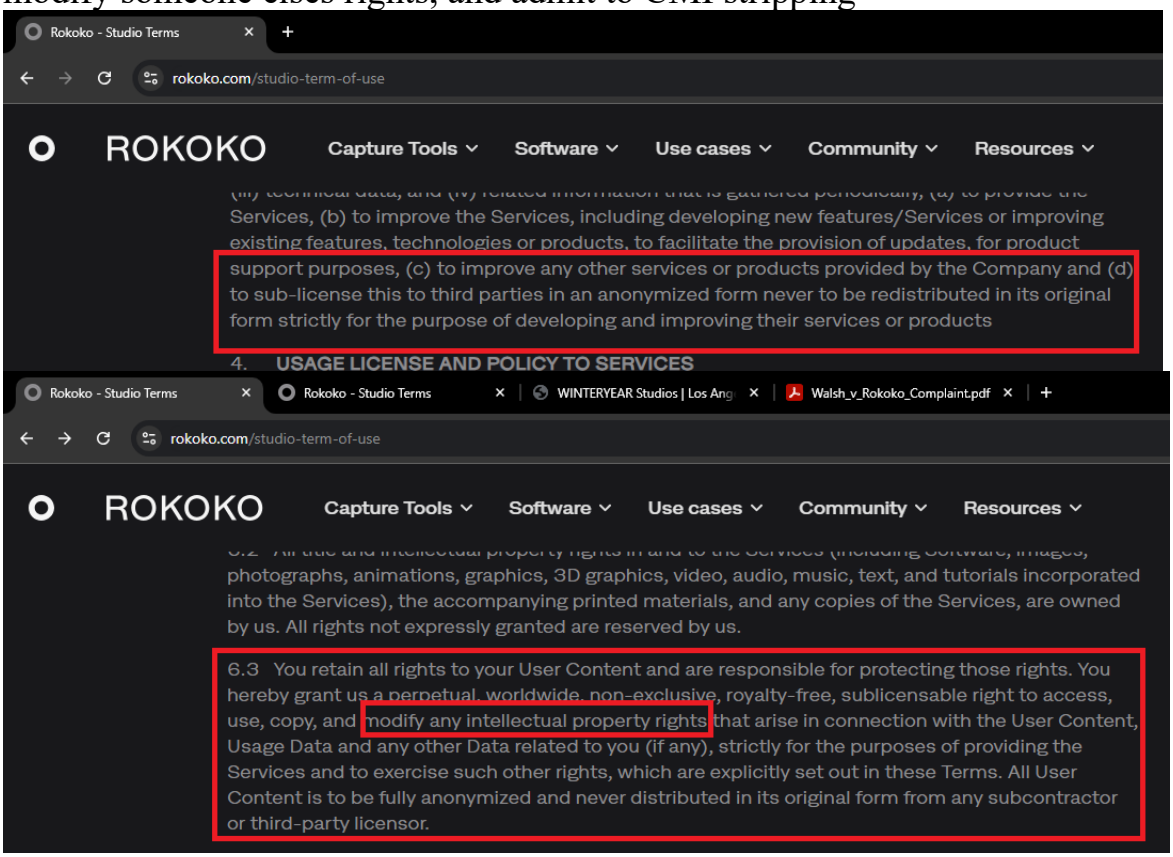
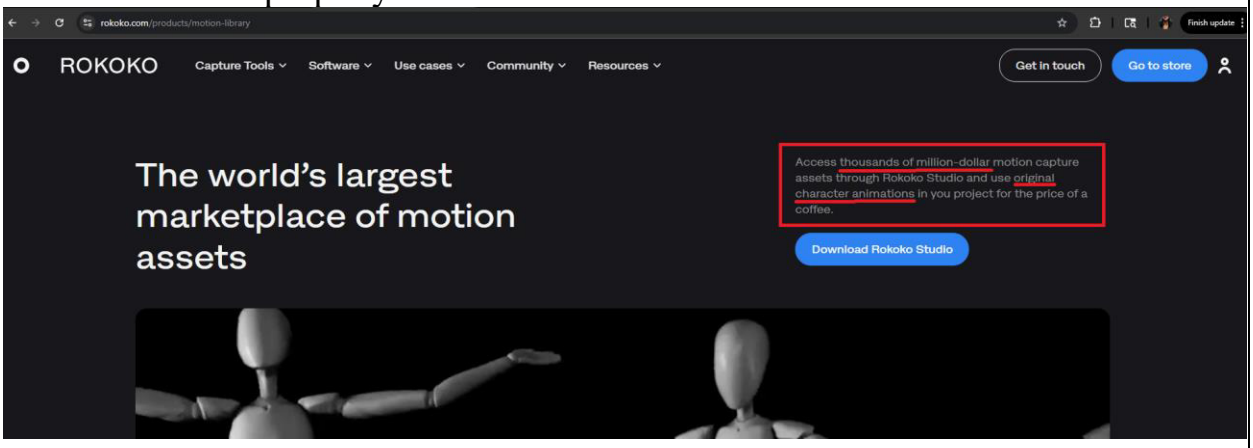
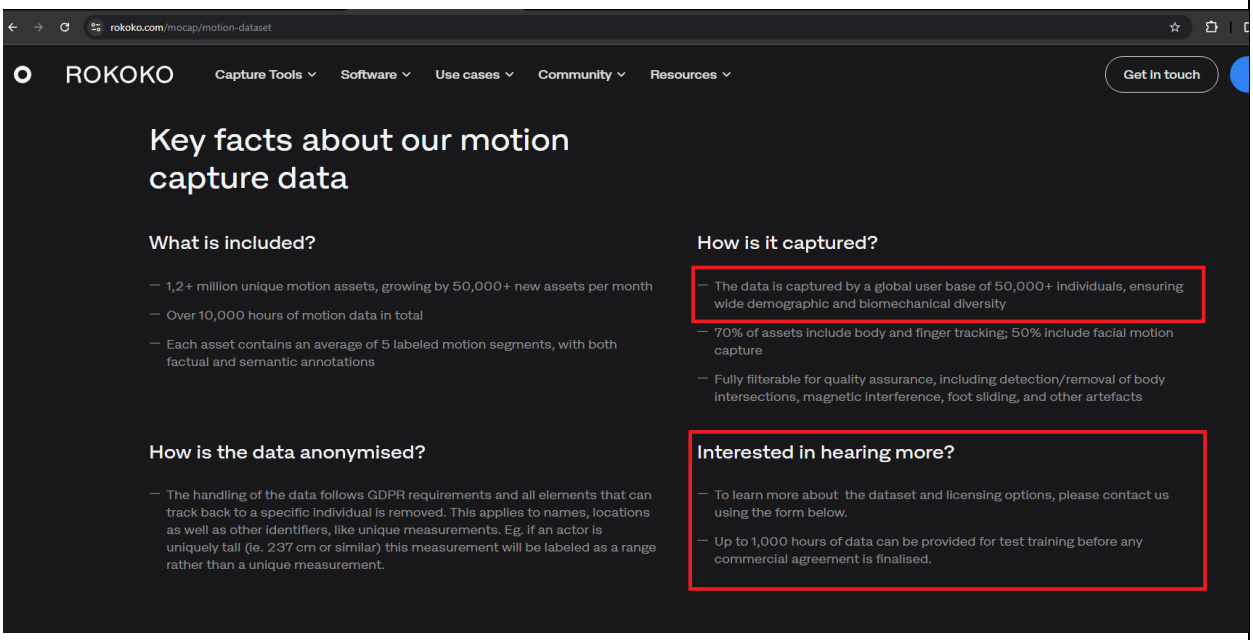
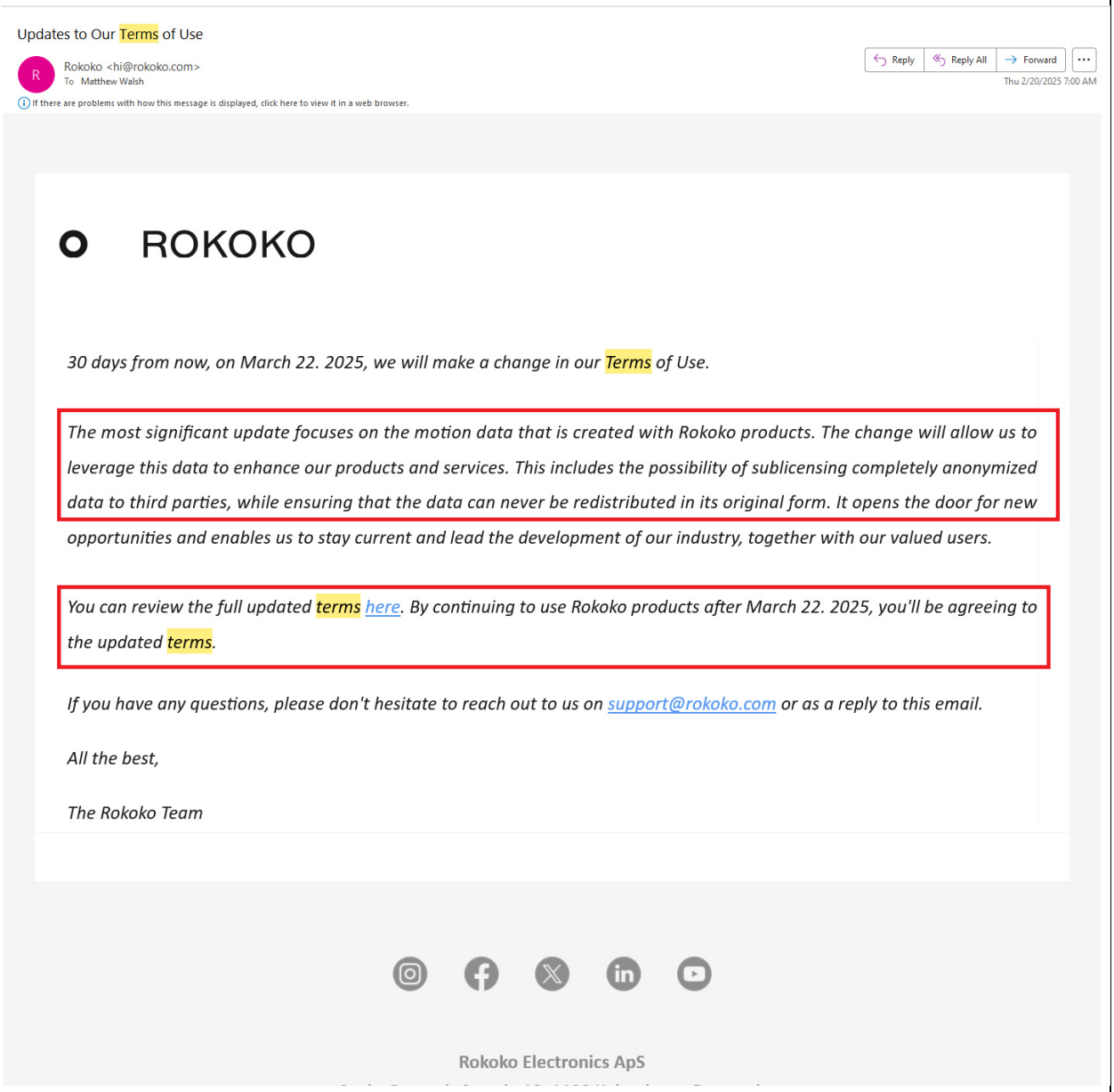


EXHIBIT 50

Defendant admits in multiple avenues that they collect, use, sublicense and sell users intellectual property and further offers it for sale.







Updates to Our Terms of Use

Rokoko <hi@rokoko.com>
To Matthew Walsh

Reply | Reply All | Forward

Thu 2/20/2025 7:00 AM

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

ROKOKO

30 days from now, on March 22. 2025, we will make a change in our Terms of Use.

The most significant update focuses on the motion data that is created with Rokoko products. The change will allow us to leverage this data to enhance our products and services. This includes the possibility of sublicensing completely anonymized data to third parties, while ensuring that the data can never be redistributed in its original form. It opens the door for new opportunities and enables us to stay current and lead the development of our industry, together with our valued users.

You can review the full updated terms here. By continuing to use Rokoko products after March 22. 2025, you'll be agreeing to the updated terms.

If you have any questions, please don't hesitate to reach out to us on support@rokoko.com or as a reply to this email.

All the best,

The Rokoko Team

Rokoko Electronics ApS

871

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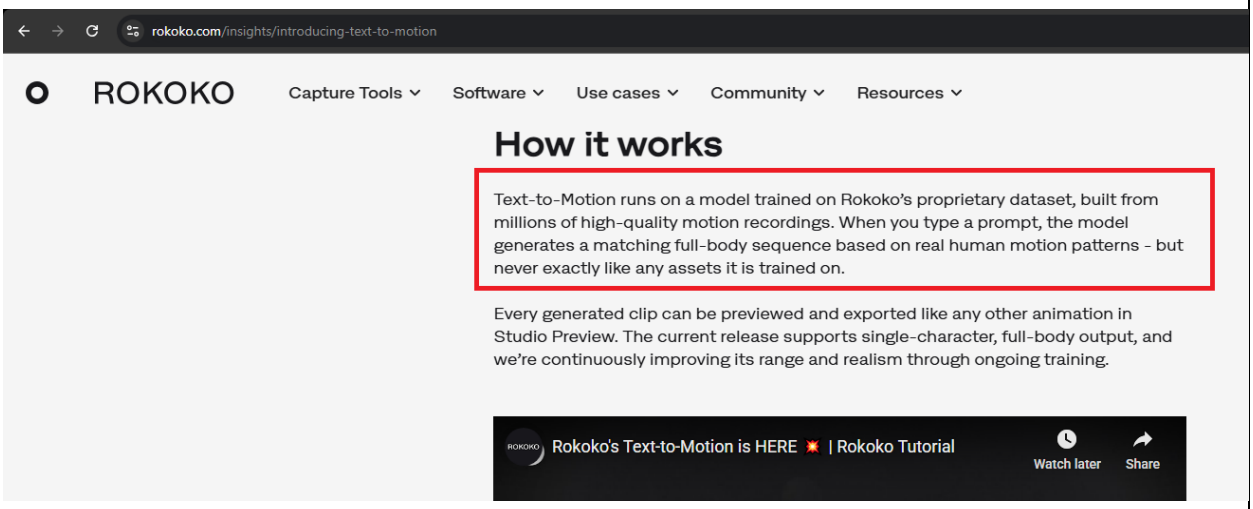
873 Rokoko makes money from this data *today*:



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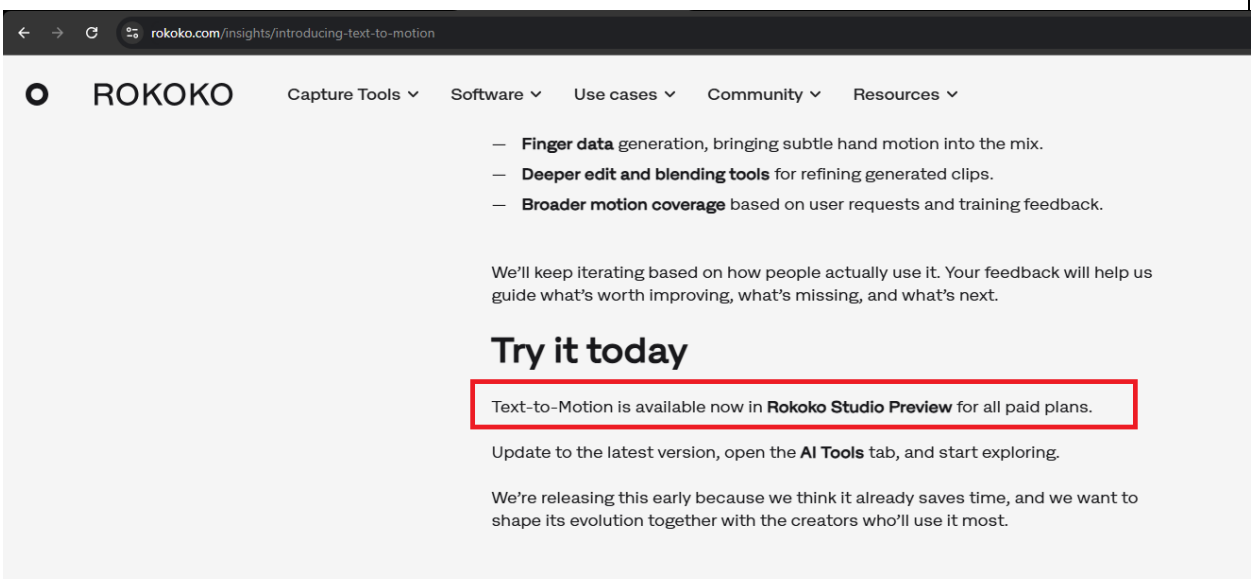

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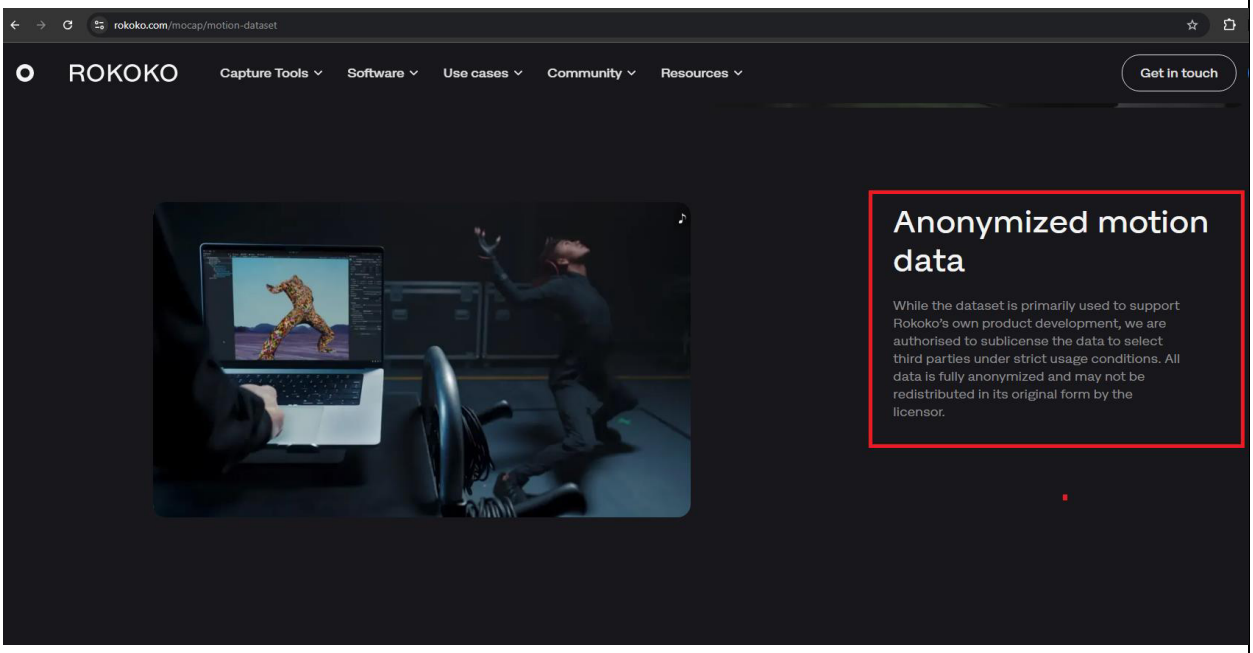

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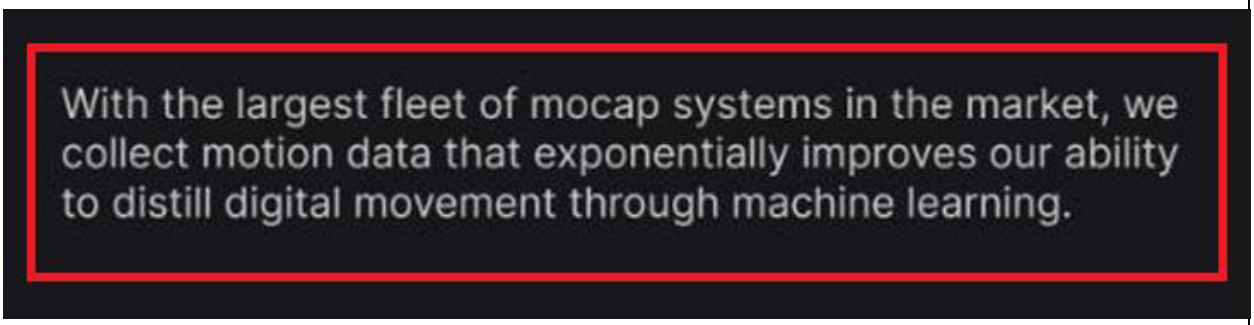
881 From the pitch deck (2022)



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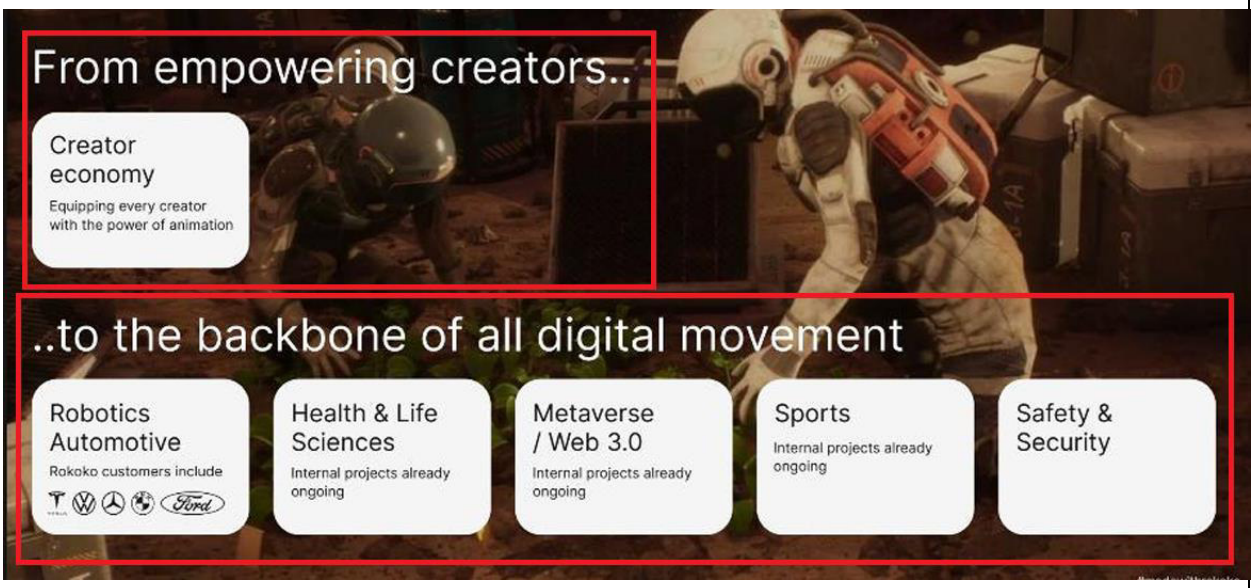
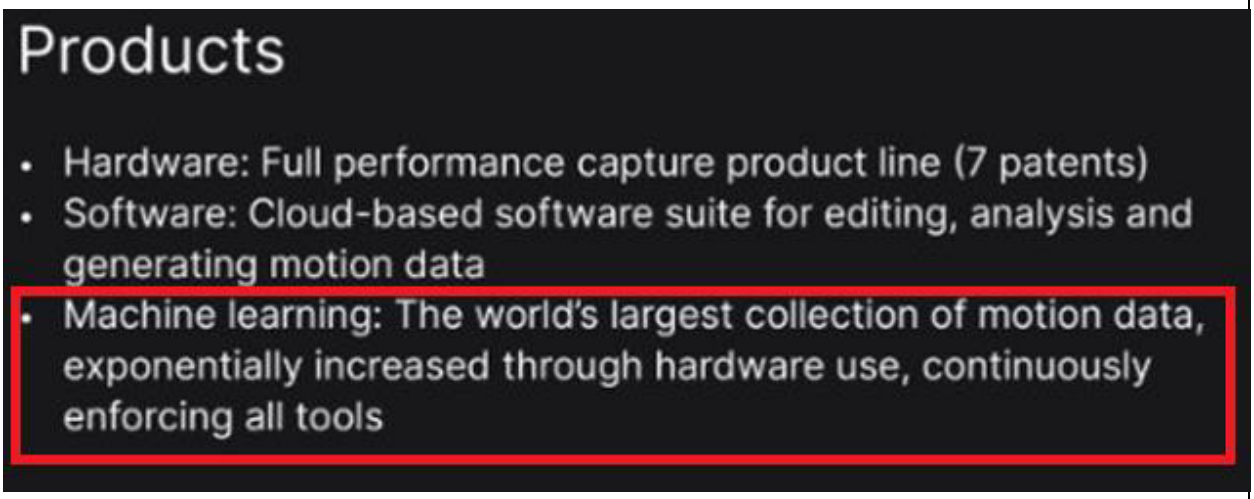

From empowering creators..
Creator economy
Equipping every creator with the power of animation
..to the backbone of all digital movement
Robotics Automotive
Rokoko customers include
Health & Life Sciences
Internal projects already ongoing
Metaverse / Web 3.0
Internal projects already ongoing
Sports
Internal projects already ongoing
Safety & Security

884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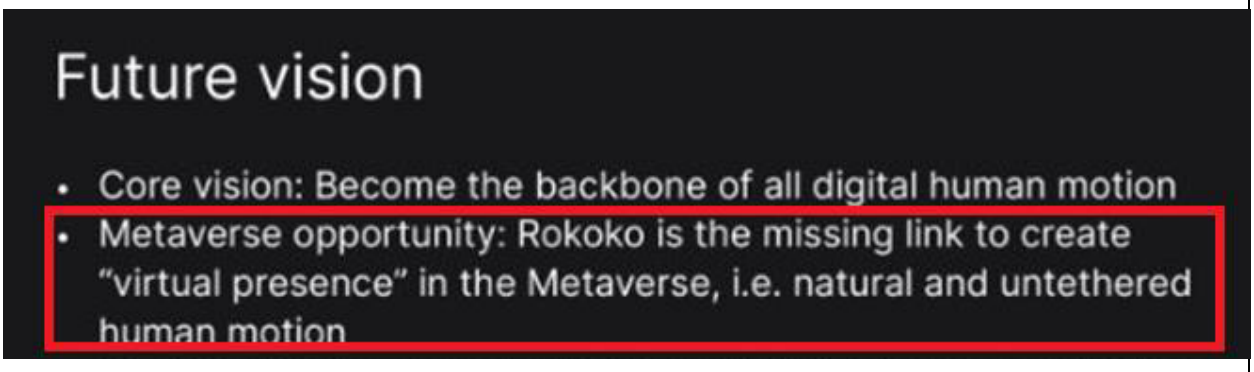
• Software: Cloud-based software suite for editing, analysis and generating motion data
• Machine learning: The world's largest collection of motion data, exponentially increased through hardware use, continuously enforcing all tools

885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• Metaverse opportunity: Rokoko is the missing link to create "virtual presence" in the Metaverse, i.e. natural and untethered human motion

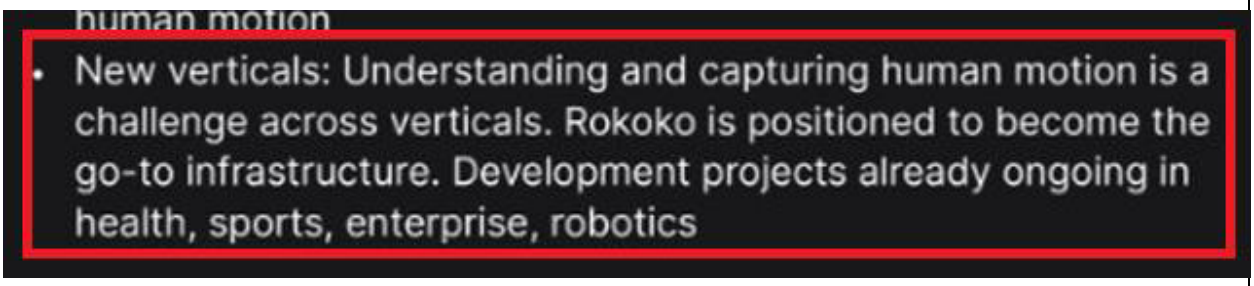
human motion
• New verticals: Understanding and capturing human motion is a challenge across verticals. Rokoko is positioned to become the go-to infrastructure. Development projects already ongoing in health, sports, enterprise, robotics

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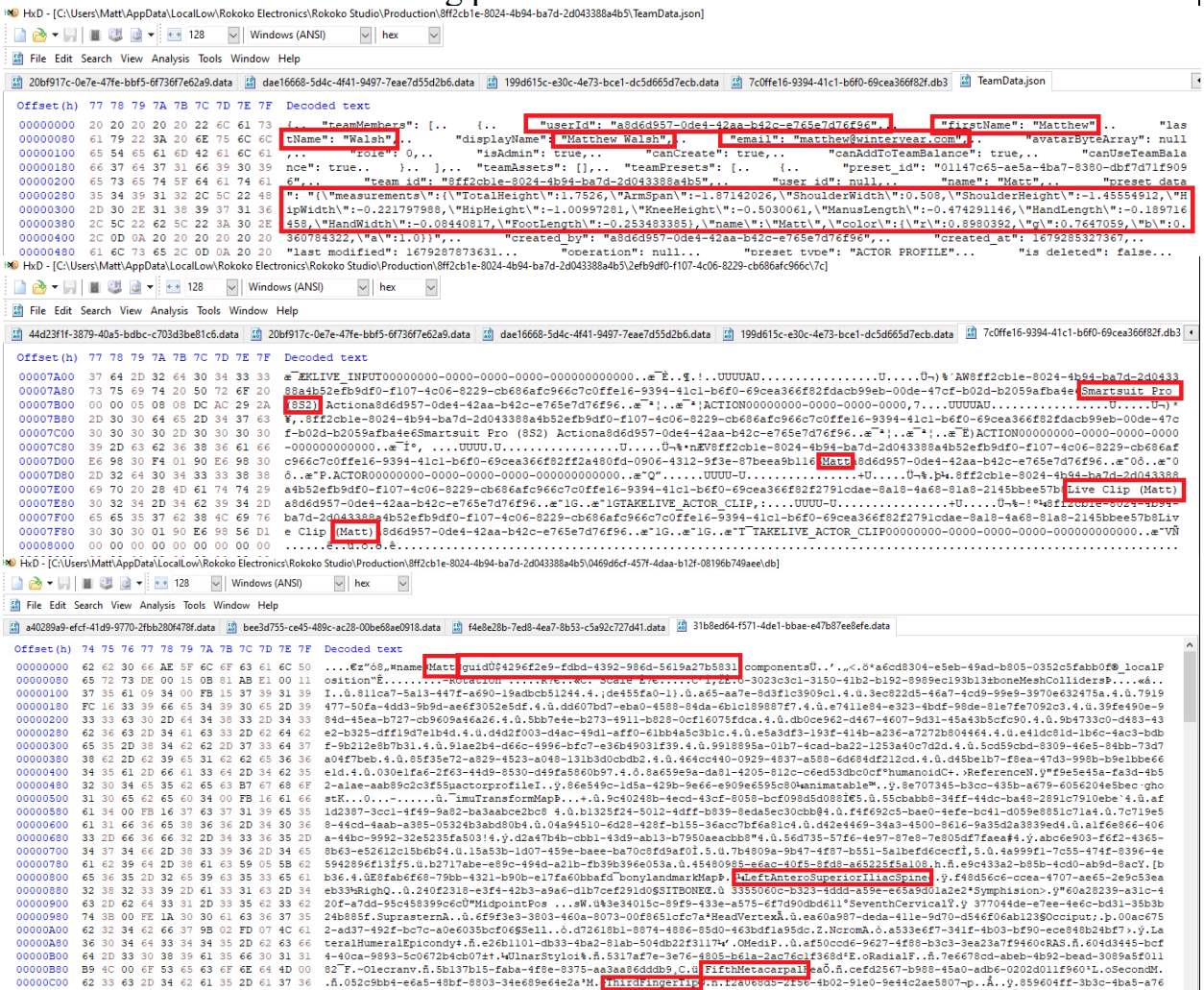
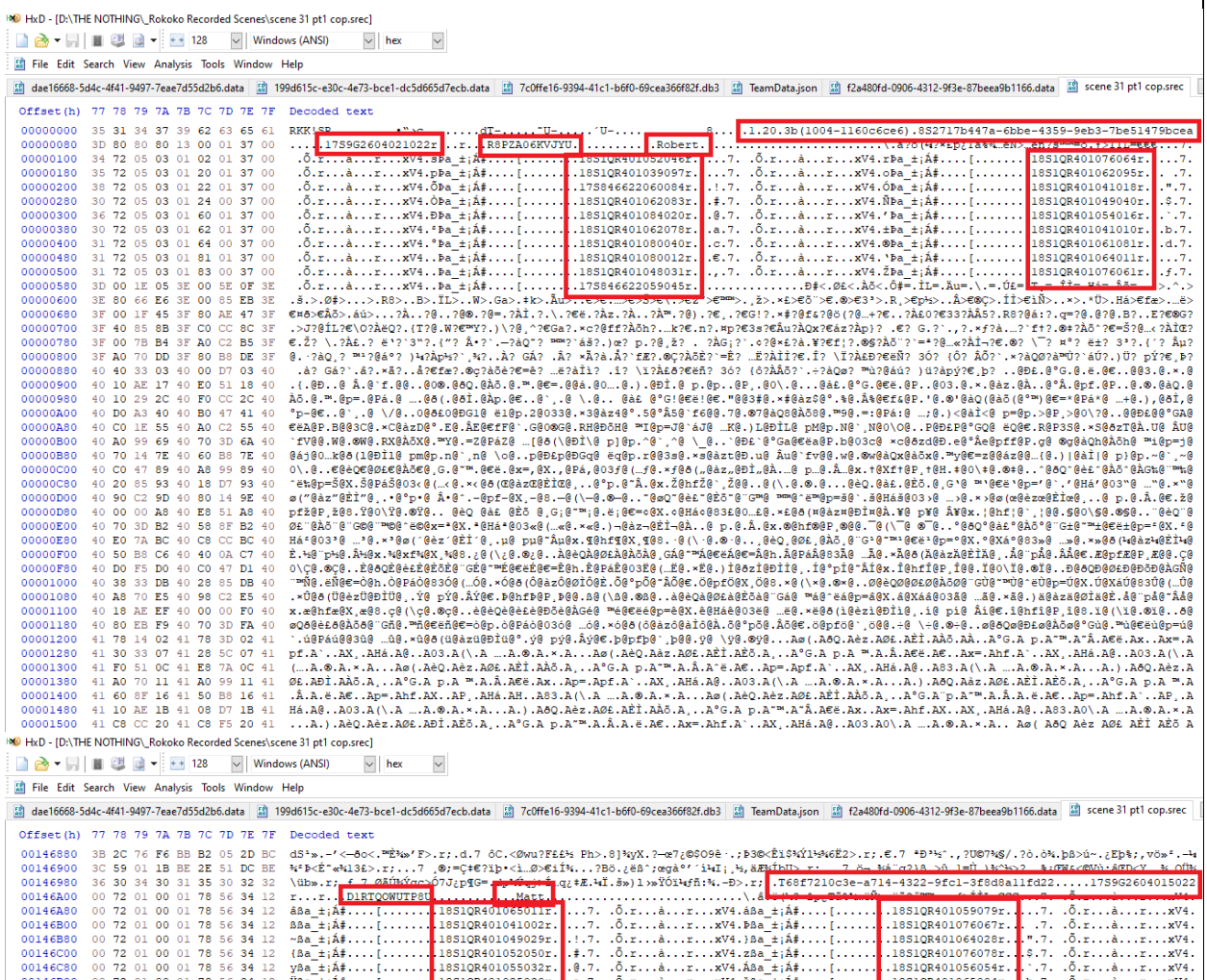
EXHIBIT 51

CMI Exists embedded in the animation files and associated metadata.

Present are hardware and animation versions, project identifiers, unique computer identifiers, unique hardware ID's/serial numbers of *every sensor* in Plaintiff's equipment, as well as Plaintiff's name, biometrics, and location. Defendant further admits to this information being present.



In this instance, an actor Plaintiff hired named "Robert" had his name embedded in the CMI along with Plaintiff's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.17S9G2604021022r
.R8PZA06KVJYU
.Robert.
18S1QR401076064r.
18S1QR401062095r.
18S1QR401041018r.
18S1QR401049040r.
18S1QR401054016r.
18S1QR401041010r.
18S1QR401061081r.
18S1QR401064011r.
18S1QR401076061r.
18S1QR401084031r.
17S8466222059045r.
HxD - [D:\THE NOTHING_Rokoko Recorded Scenes\scene 31 pt1 cop.srec]
File Edit Search View Analysis Tools Window Help
Offset(h) 77 78 79 7A 7B 7C 7D 7E 7F Decoded text
.DlRTQOWUTP8T
.Matt
18S1QR401065011r.
18S1QR401041002r.
18S1QR401049029r.
18S1QR401052050r.
18S1QR401055032r.
18S1QR401085030r.
18S1QR401052066r.
18S1QR401055031r.
18S1QR401056043r.
18S1QR401059048r.
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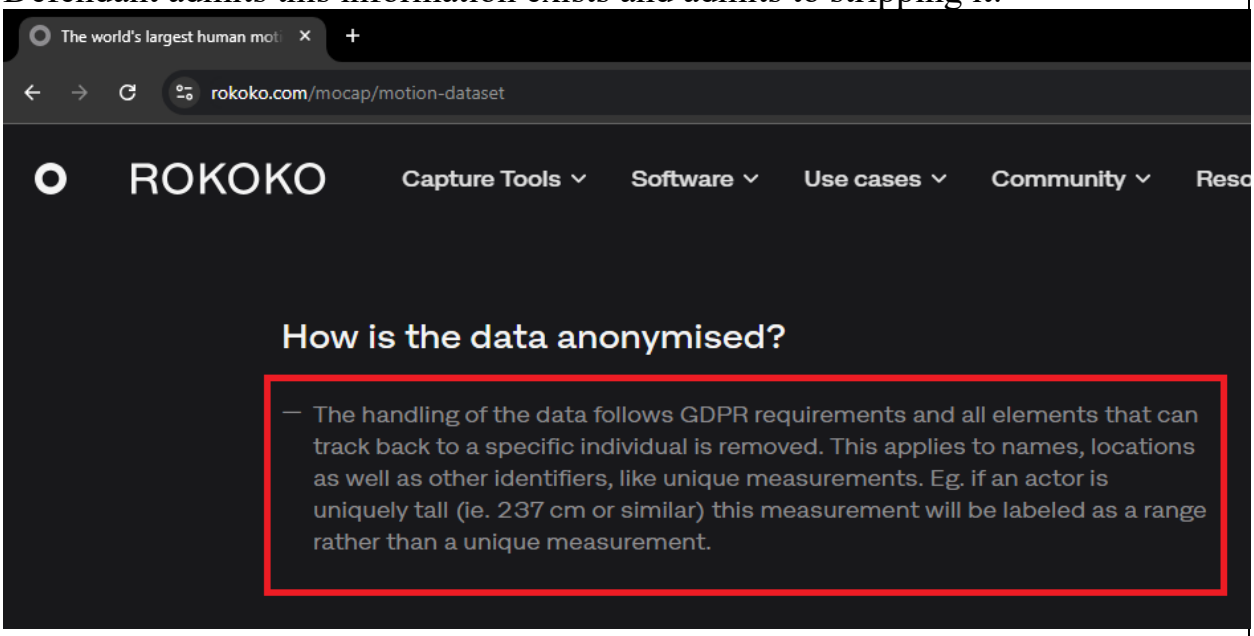
050FFDC0 00 00 00 00 00 00 00 00 00 00
050FFE00 2E 2E 00 00 00 00 00 00 00 00
050FFE40 2E 2E 2E 2E 2E 2E 2E 2E 2E 2E
050FFE80 00 00 2E 2E 2E 2E 2E 2E 2E 2E
050FFEC0 00 00 02 00 00 00 31 34 30 39 .binrcdng.....1409
050FFF00 2E 2E 2E 2E 2E 2E 2E 2E 2E 2E 262f-743b-4999-b912-27136ee9c1d0 . .Matt.
050FFF40 4C BD 4A 0C 02 BF 7D 3F F5 BE
050FFF80 2E 2E 2E 2E 2E 2E 2E 2E 2E 2E \.,¿B`e¼273c71b6-1c84-4283-aela-d4b1d9cb6a0d. .Robert.
050FFFC0 F1 BF 9A 99 99 BD 6F 12 83 BE
05100000 76 72 63 64 6E 67 2E 2E 2E 2E .smrtglvrcdng...

Defendant admits this information exists and admits to stripping it:



The terms imposed in 2025 grant retroactive rights, the right to override and modify someone elses rights, and admit to CMI stripping

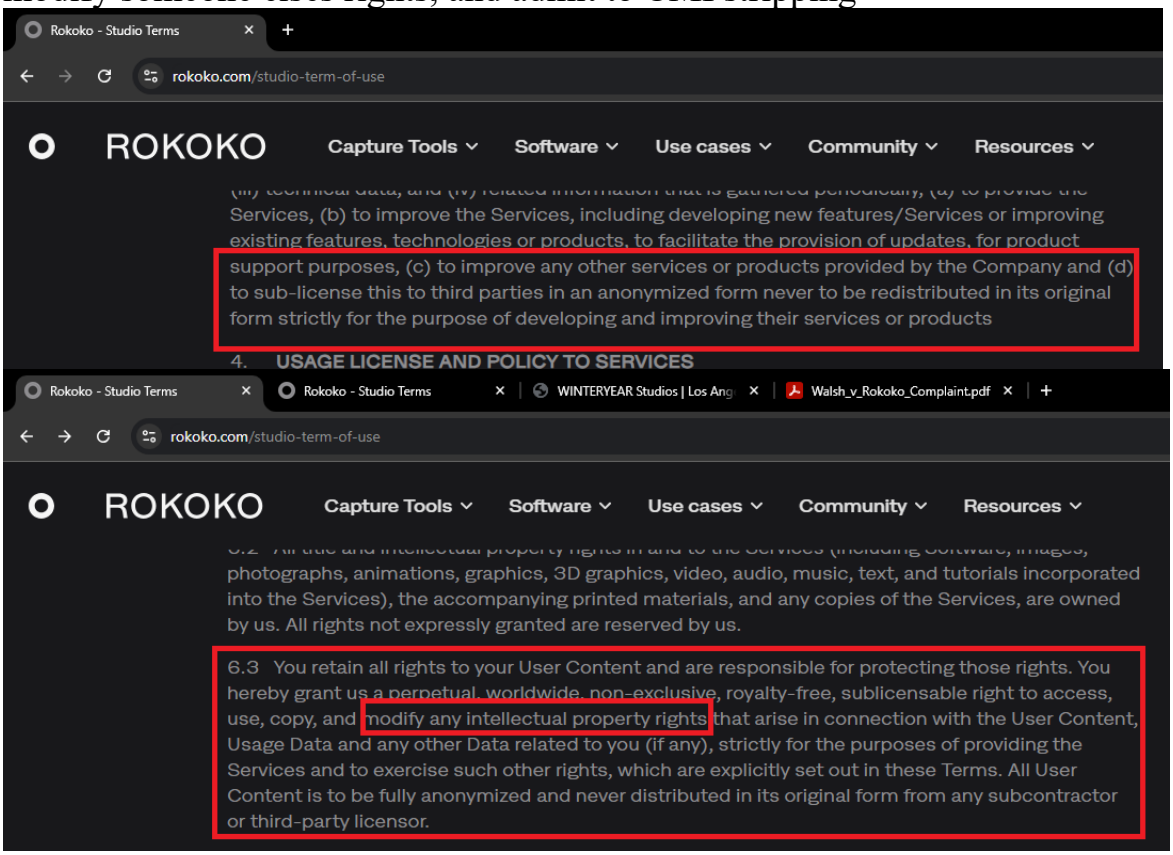
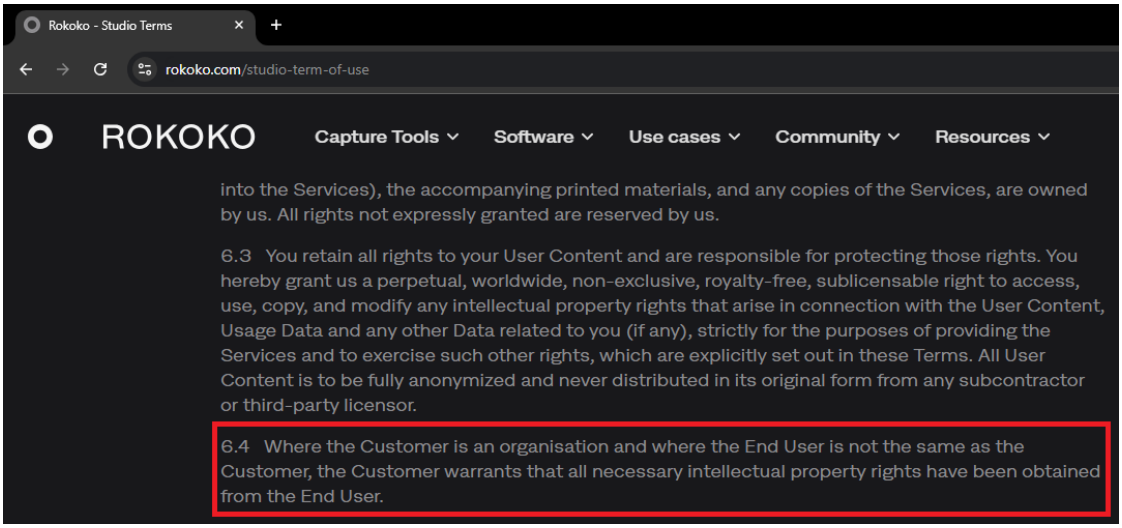


EXHIBIT 52

Defendant openly states as of 2025, they will take all intellectual property, *even if it belongs to another* (such as in a work for hire situation); and liability rests squarely on the performer for infringement.



As of 2025, they further contract themselves out of liability for infringement:

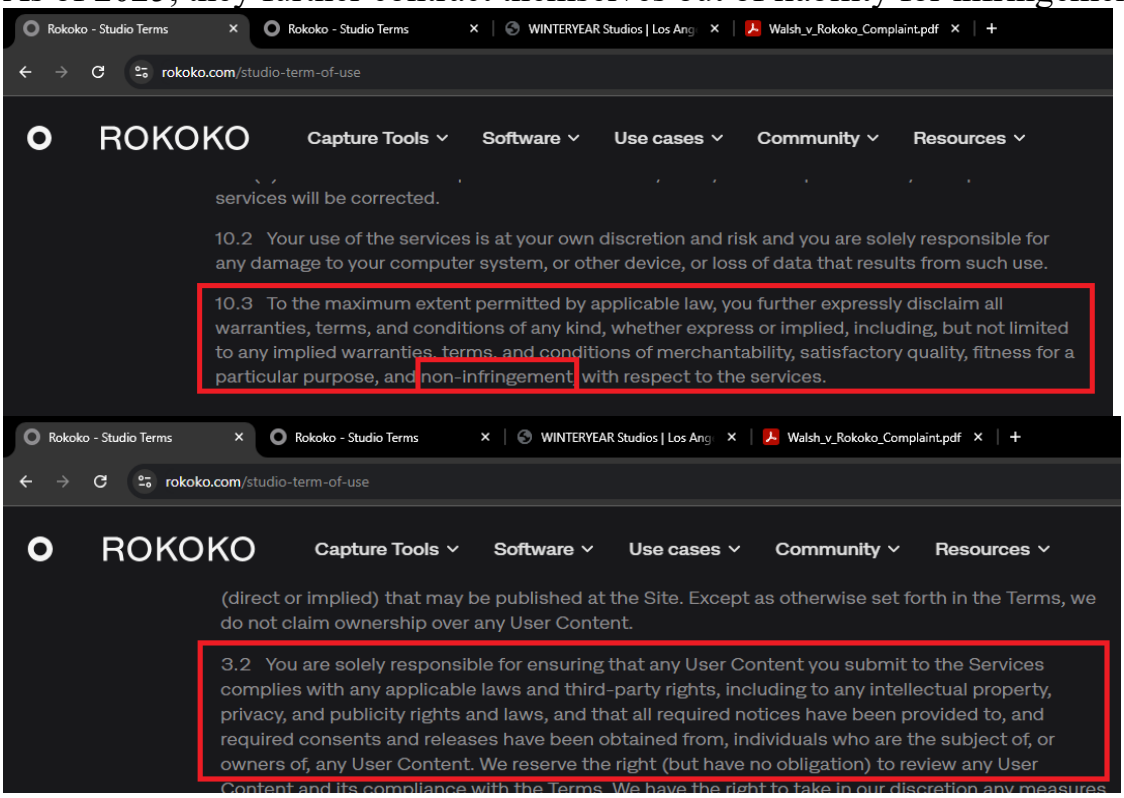
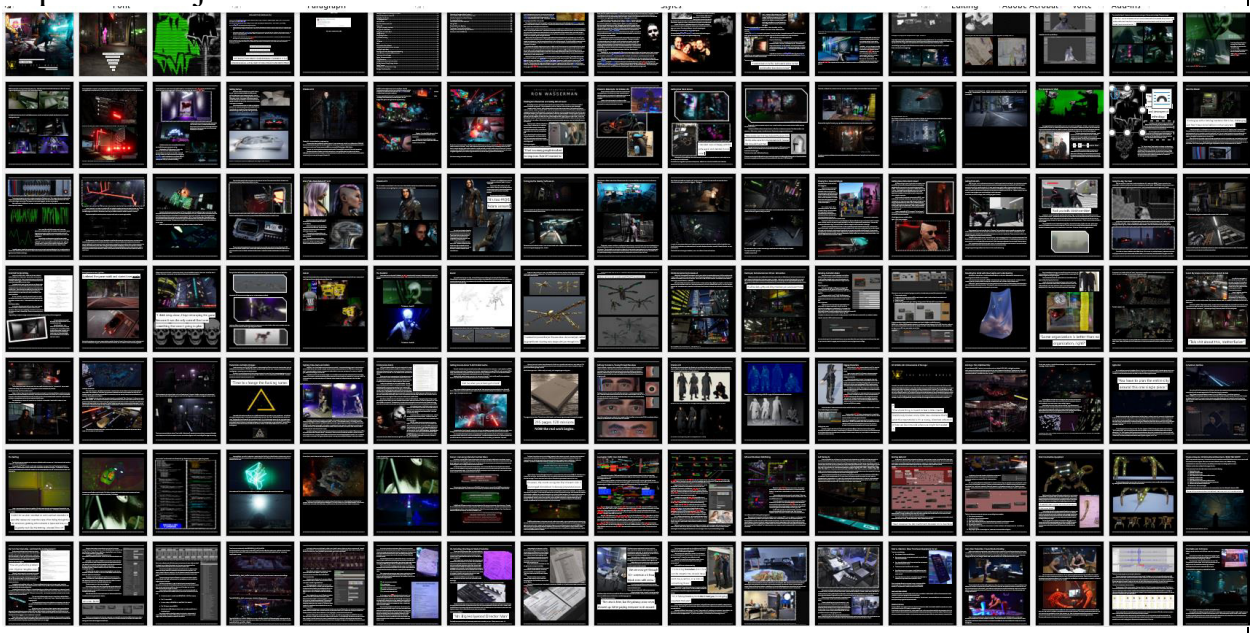


EXHIBIT 53

954 A portion of just one of Plaintiff's books which were to be released:



955
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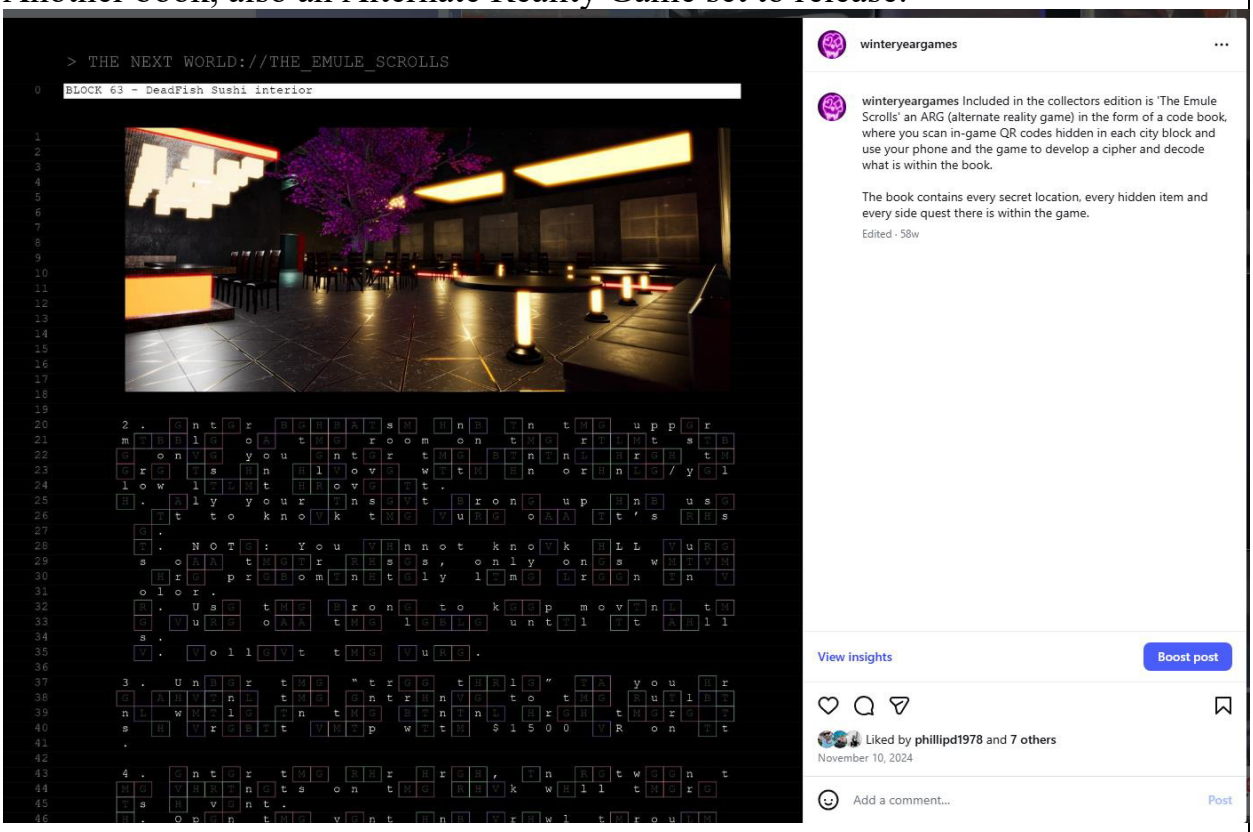
957 Another book, also an Alternate Reality Game set to release.



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Three of the main character t-shirts Plaintiff had put into production, with glow and foil components:

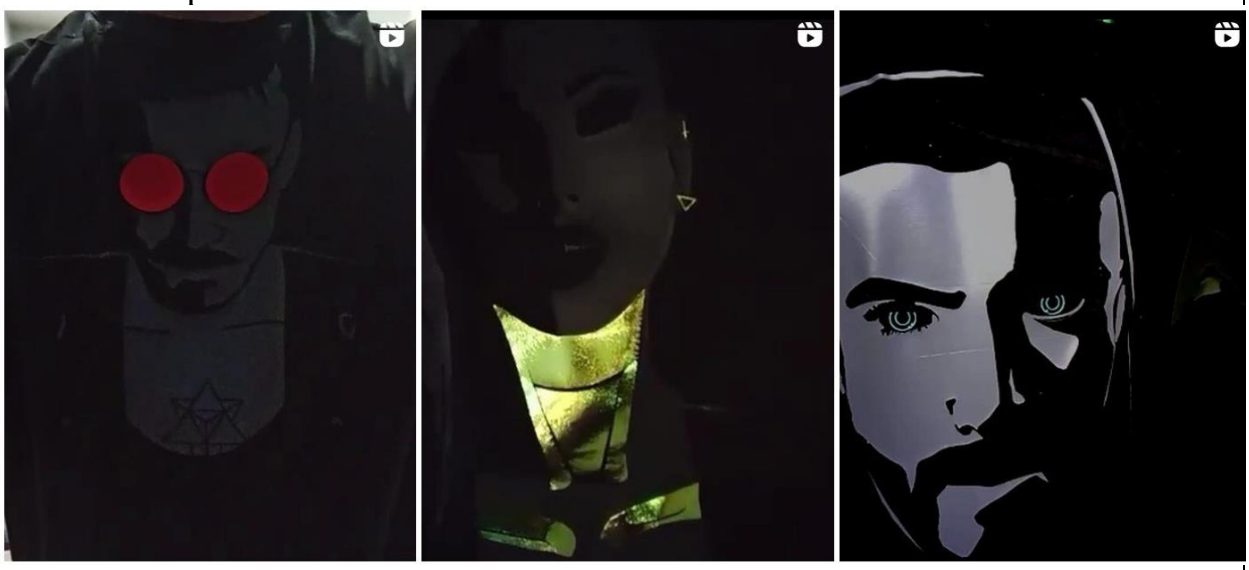


EXHIBIT 54

Plaintiff was in early talks for adaptation to a TV series which was halted. This is the pitch deck.

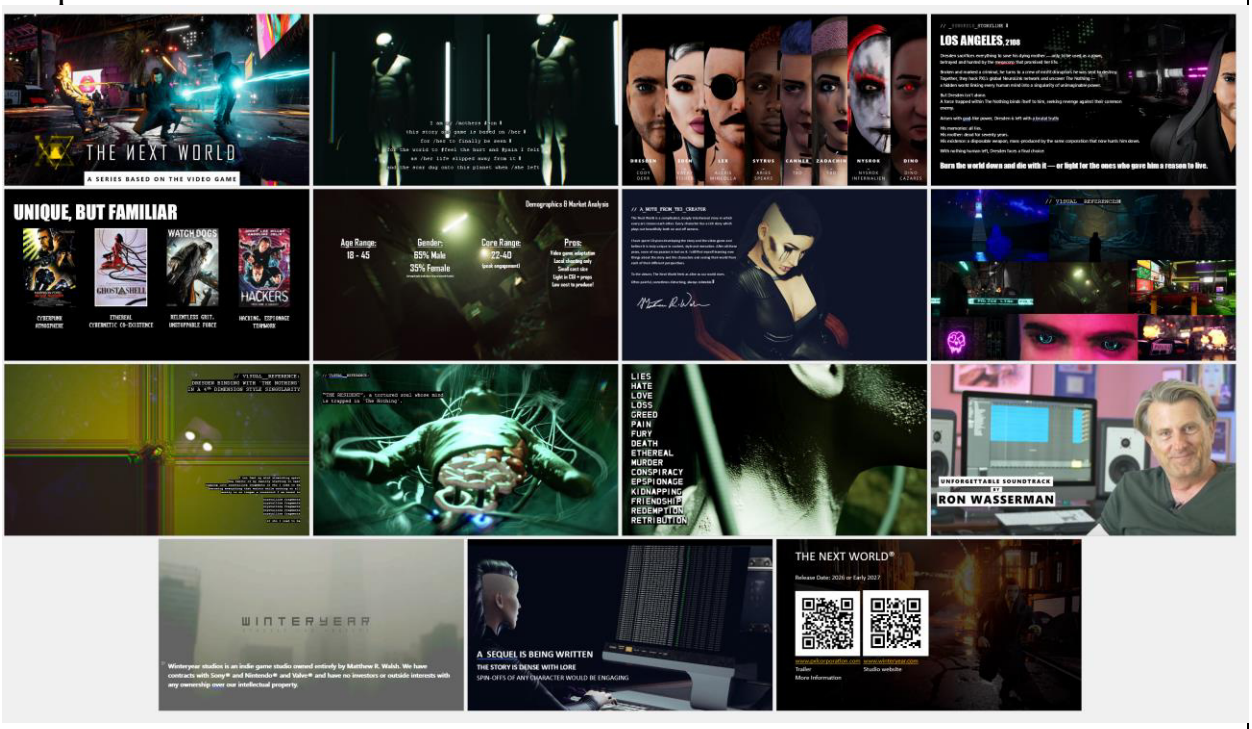
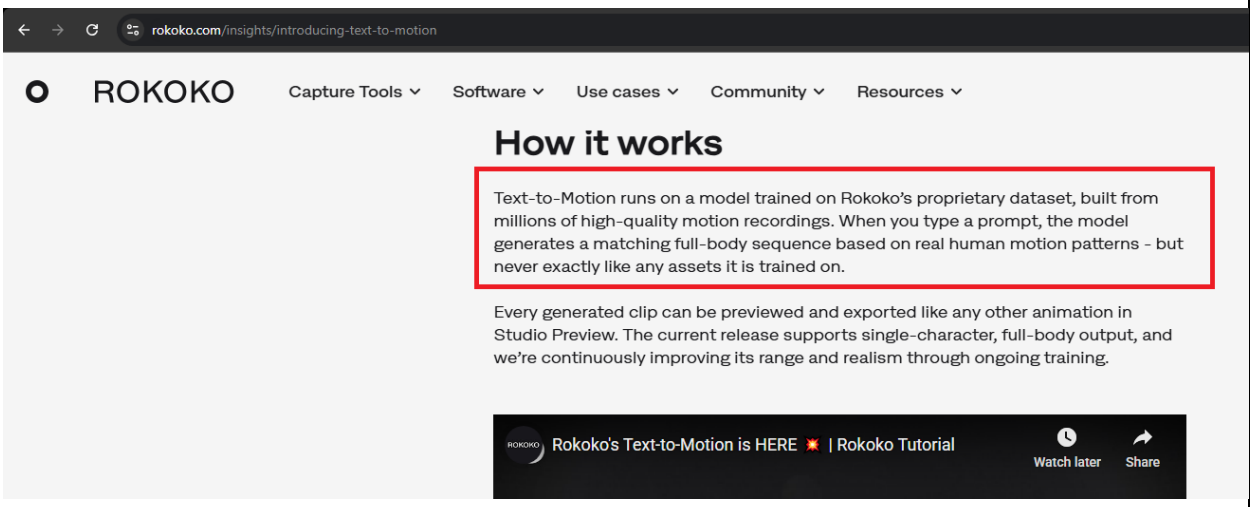


EXHIBIT 55

Defendant openly admits they used Plainitff's IP to build a dataset, train an AI model and now sell subscription plans for users to use that AI model to generate derivative works.



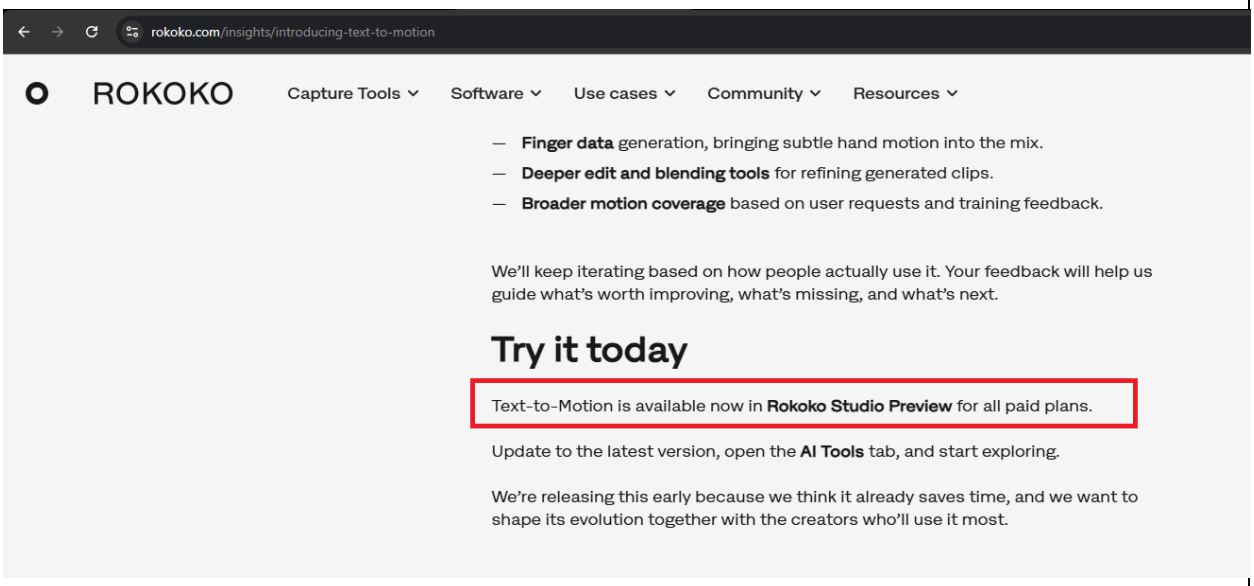


EXHIBIT 56

Defendant sublicenses Plaintiff's intellectual property as well as uses it internally for their own projects.

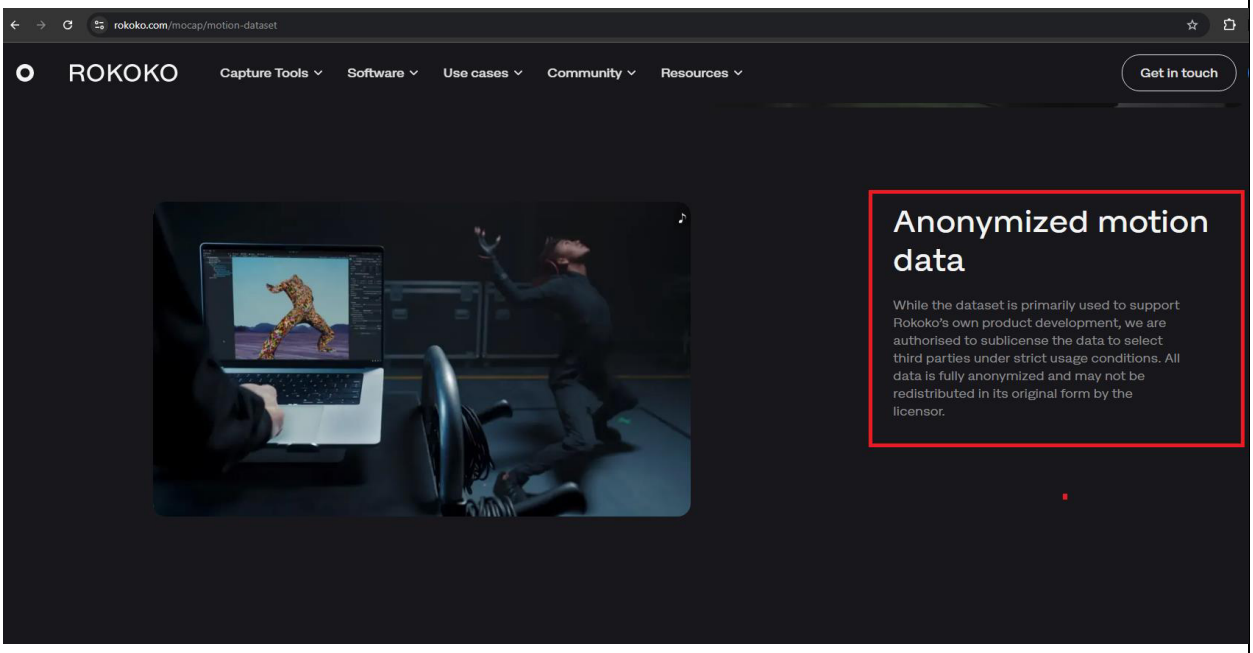
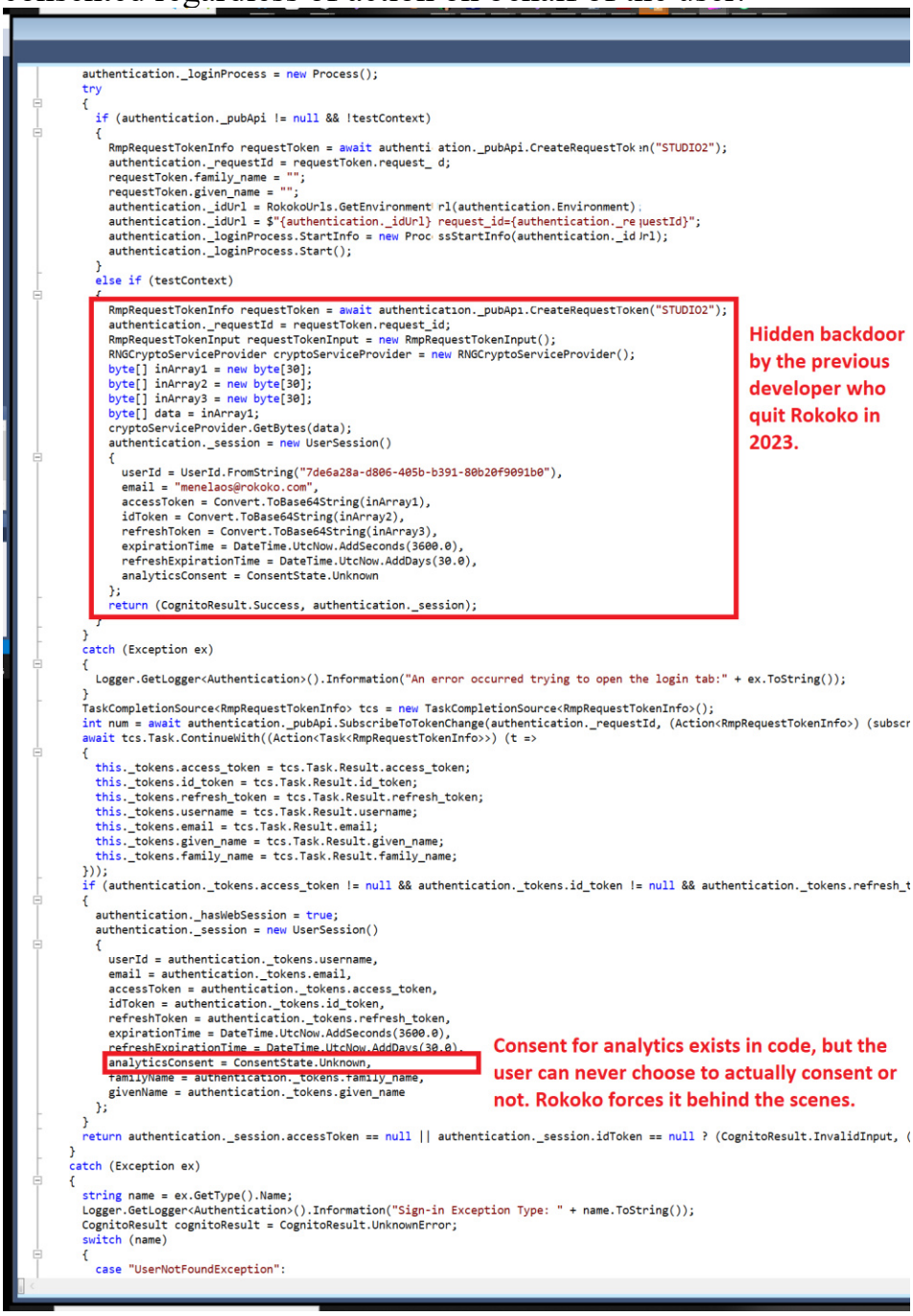


EXHIBIT 57

Defendant forces consent of the EULA for users in their code, even when the user has not consented. If any errors or issues occur, the user is deemed to have consented regardless of action on behalf of the user.



```
    cognitoUser.SessionTokens = new CognitoUserSession((string) null, authentication._session.accessToken, (string) null, new DateTime(
    try
    {
      // ISSUE: reference to a compiler-generated method
      return await authentication.TaskOrTimeout((Task) cognitoUser.GetUserDetailsAsync(), ct, userResponse: new Action<GetUserResponse>
    }
    catch (Exception ex)
    {
      return CognitoResult.UnknownError;
    }
  }

  public async Task<CognitoResult> SetUserAttributeOptedInAnalytics(
    ConsentState consent,
    CancellationToken ct)
  {
    Authentication authentication = this;
    CognitoUser cognitoUser = new CognitoUser(authentication._session.userId.Value, authentication._config.cognitoClientId, authenticat
    cognitoUser.SessionTokens = new CognitoUserSession(authentication._session.idToken, authentication._session.accessToken, authentica
    try
    {
      return await authentication.TaskOrTimeout(cognitoUser.UpdateAttributesAsync((IDictionary<string, string>) new Dictionary<string,
      {
        {
          "custom:studio_ut_opt_in",
          consent == ConsentState.Accepted ? "true" : "false"
        },
        {
          "custom:studio_eula_v2_read",
          "true"
        }
      }), ct);
    }
    catch (Exception ex)
    {
      return !(ex.GetType().Name == "NullReferenceException") ? CognitoResult.UnknownError : CognitoResult.Success;
    }
  }

  private string MapJobArea(JobArea jobArea)
  {
    switch (jobArea)
    {
      case JobArea.AnimationVfx:
        return "animation_vfx";
      case JobArea.GameVrArDevelopment:
        return "game_vr_ar";
      case JobArea.AdvertisementCommunication:
        return "advertisement_communication";
      case JobArea.Academic:
        return "academic";
      case JobArea.SportsHealth:
        return "sports_health";
      case JobArea.Other:
        return "other";
      default:
        return "other";
    }
  }

  private static string MapOrganizationSize(OrganizationSize size)
  {
    switch (size)
    {
      case OrganizationSize.One:
        return "1";
      case OrganizationSize.TwoPlus:
        return "2_10";
      case OrganizationSize.ElevenPlus:
        return "11_50";
      case OrganizationSize.FiftyPlus:
        return "51_200";
      case OrganizationSize.TwoHundredPlus:
        return "201_500";
      case OrganizationSize.FiveHundredPlus:
        return "500_";
      default:
        return "1";
    }
  }

  private async Task<CognitoResult> TaskOrTimeout(
```

<-- falsify that they read the EULA and report it whether they did or not.

if any error happens, just pretend they accepted the EULA and analytics

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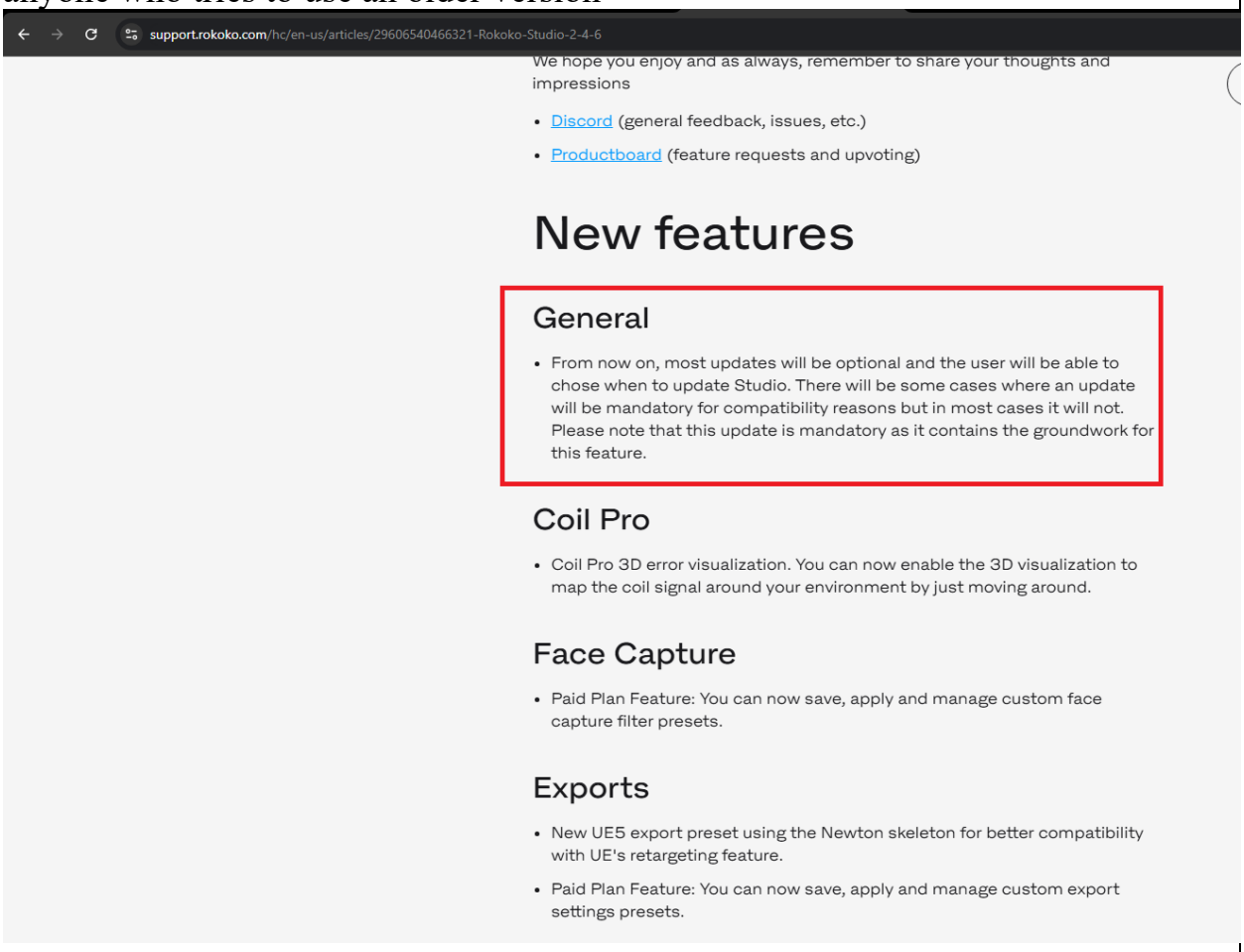
EXHIBIT 58

Defendant claims all updates are optional “from now on”, yet forces updates on anyone who tries to use an older version



https://winteryear.com/videoView.php?id=200