

1 MATTHEW R. WALSH
2 19197 GOLDEN VALLEY RD #333
3 SANTA CLARITA, CA 91387
4 (661) 644-0012

5 Plaintiff In Pro Per,

6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

MATTHEW R. WALSH
Plaintiff In Pro Per,
vs.

ROKOKO ELECTRONICS
(AND DOES 1 THROUGH 50,
INCLUSIVE)

Defendant

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

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

Hearing Date: January 26, 2025
Hearing Time: 1:30 PM

**DECLARATION OF MATTHEW R.
WALSH re: CORRIDOR DIGITAL
HARASSMENT**

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9 I, Matthew R. Walsh, declare I am the Plaintiff in this matter. I have personal
10 knowledge of the following facts and if called as a witness I could and would
11 testify competently hereto. All text, images and exhibits herein are true and
12 accurate copies which I have received or have made and I am authenticating all of
13 them under the penalty of perjury.

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

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19 1. Corridor Digital is a self-admitted business partner of Defendant (Exhibit 1).

20 2. Corridor Digital is *the only media outlet* that has uttered even a single word
21 of this case (Exhibit 2) which is not a coincidence:

22 3. Corridor Digital admits to receiving the lawsuit information *the same day*
23 *they filmed with Rokoko*, not by chance or happenstance: “*I saw **this last***
24 ***night**, I think, and I was kind of like, uh oh. And I like didn't look into it. I*
25 ***filmed the Rococo brand integration yesterday**. Yeah, I was going to say we*
26 *just did a Rokoko.”... Talking points were clearly fed to Corridor Digital by
27 Defendant as they stated on air “*you know, we're talking to him [Rokoko]*
28 *right now.*”*

29 4. At the instruction of Defendants, Corridor Digital refused to accept service
30 and acted hostile towards the processors so they would not return (Exhibit
31 3).

32 5. In short, they, acting as agents of Defendants:

33 a. Attacked my mental state and capacity

34 b. Accused me of defamation, slander and libel.

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- 36 c. Accused me of using bots/alt accounts (I didn't have anything to do
37 with a single comment on Reddit).
- 38 d. Claimed my headline was manipulative and deceptive.
- 39 e. Said people "fell for my bait."
- 40 f. Said my case falls apart and is mostly BS.
- 41 g. Misrepresented my lawsuit as not accepted.
- 42 h. Mocked and dismissed my evidence.
- 43 i. Stated I "invented" my evidence
- 44 j. Portrayed me as dishonest or intentionally misleading.
- 45 k. Suggested I manipulated online communities.
- 46 6. This is a list of just some of the defamatory things they said on their podcast
47 to 10M subscribers:
- 48 a. **"you know, we're talking to him [Rokoko] right now."**
- 49 b. *"First off, the guy who posted all of these links is the plaintiff."*
- 50 c. *"So the guy who made every subreddit post in all these different
51 channels is the guy who is actually suing Rocco?"*
- 52 d. *"I think 99% of this guy's case is in the headline that he's written for
53 himself."*
- 54 e. ***"The state lawsuit was not accepted. Yeah, not even accepted."***

- 55 f. *"I'm just really sad that like so many people like kind of like fell for*
56 *the bait..."*
- 57 a. *"And generally speaking, someone usually confirms or denies like, oh,*
58 *whether this is BS or not, you know, And I, I, I appreciate that. And*
59 *so, so I had to take it upon myself to like go into all these threads and*
60 *be like, guys, this is BS."*
- 61 g. *"Everything after that, once you actually like start to critically think*
62 *about it, falls apart pretty quickly."*
- 63 h. *"So the headline that I just read you was written by the person who*
64 *has beef with Rokoko and is **trying** to sue them."*
- 65 i. *"At what point does it go to like slander or libel or whatever? -- Well,*
66 *in a lot of ways it's on its way there right now."*
- 67 j. *"I think those are bot comments."*
- 68 k. *"I think that's him using alt accounts just to like bump up the drama*
69 *and his threads."*
- 70 l. *"This guy's actually unhinged."*
- 71 m. *"I don't know what's wrong with him, but I think he's might be a little*
72 *crazy..."*
- 73 n. *"Yeah, he's just man, he's a little off his rocker."*
- 74 o. *"One's an 8 year old account." (implying manipulation)*

- 75 p. *“He’s unhinged”*
- 76 q. *“People just merely saying the same thing... I think those are bot*
- 77 *comments.”*
- 78 r. *“99% of this guy's case is in the headline that he’s written for*
- 79 *himself.”*
- 80 a. *“The guy says he's got evidence. Yeah, Rococo bad. How incredibly*
- 81 *unsurprising, I know, but people read a headline and believed it.”*
- 82 s. *“It’s basically guys just confused about the terms of service.”*
- 83 t. *“It's one of those weird things... a single person just making*
- 84 *mountains and mountains of data and text.”*
- 85 u. *“Like, I don't know what's wrong with him, but I think he's might be a*
- 86 *little crazy because he said he, in his evidence, he said he hired*
- 87 *private investigators to check out where Rococo's headquarters was”*
- 88 v. *“He alleges things like Rokoko is stealing your IP... ignoring the fact*
- 89 *that Rokoko has a cloud service.”*
- 90 w. *“Do you think they're jerking off to your mocap data or something?”*
- 91 x. *“They're gonna sell it to James Cameron and put it in Avatar 3.”*
- 92 y. *“Frankly very impressive and well written attention grabbing*
- 93 *headline.”*

- 94 z. *“He basically got it into the court system and then wrote this headline*
95 *saying Rokoko hit with...”*
- 96 aa. *“He has evidence of this, which is just his computer’s network*
97 *traffic...”*
- 98 bb. *“What the hell do you think they're doing with the data?”*
- 99 cc. *“It's a weird like warrior type where it's like, I'm going to amass this*
100 *data, uncover this...”*
- 101 dd. *“It's just like a 2 hour uncut stream of just network traffic.”*
- 102 ee. *“People see the headline and they're subconsciously hit with this*
103 *influence of, oh, this company bad.”*
- 104 ff. *“When it finally gets corrected, no one ever sees it.”*
- 105 gg. *“Is this legit? ... This feels SUS.”*
- 106 hh. *“This guy is actually unhinged.” (again)*
- 107 ii. *“He might be a little crazy.” (again)*
- 108 jj. *“That's the difference between like oh some guy with a bone to pick*
109 *and someone who's unhinged.”*
- 110 kk. *“Guys just confused about the terms of service.” (duplicate but*
111 *included)*
- 112 ll. *“People fell for the bait.”*

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114 Executed this 10th day of December, 2025, in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff In Pro Per

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EXHIBIT 1

124 Defendant admits Corridor is a business partner after a subpoena is issued and pre-emptly any discovery from them stating those terms are confidential.
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Matthew R. Walsh
September 25, 2025
Page 2

ReedSmith

A. Plaintiffs In Pro Per Cannot Issue Subpoenas Without Approval From The Clerk Of The Court Or A Licensed Attorney.

Pursuant to Fed. R. Civ. P. 45(a)(3), “[t]he clerk must issue a subpoena, signed but otherwise in blank, to a party who requests it. That party must complete it before service. An attorney also may issue and sign a subpoena if the attorney is authorized to practice in the issuing court.” See also *Ekene v. Office L. Fowler*, 2023 U.S. Dist. LEXIS 187409, at *3 (C.D. Cal. April 13, 2023) (“Plaintiff, proceeding pro se, may only serve a subpoena issued by the Clerk of this Court.”); *McGee v. Cnty. of Riverside*, 2022 U.S. Dist. LEXIS 193707, at *2 (C.D. Cal. Oct. 21, 2022) (“If a pro se plaintiff needs to seek information from non-parties, this must be done through a subpoena issued by the Clerk and approved by the Court.”).

None of the Subpoenas were issued by the Clerk. Instead, you signed on the line clearly delineated “Attorney’s signature” and served them. You are not a licensed attorney, and this was completely improper. Accordingly, the Subpoenas are clearly defective on their face.

B. The Subpoenas Seek Rokoko’s Confidential Commercial Information And Violate Individual Privacy Interests.

Courts have broad discretion to quash or modify a subpoena that seeks the disclosure of “a trade secret or other confidential research, development, or commercial information.” Fed. R. Civ. P. 45(d)(3)(B)(i). The Subpoenas to Corridor, Naver Z, and Trifork must be withdrawn because they seek highly confidential information for improper purposes—to expand discovery in this action beyond proper bounds and pry into Rokoko’s confidential business relationships with its partners. Your requests seek a broad array of confidential information about the inner workings of Rokoko’s business, including private communications, third party contracts, and sensitive materials concerning investment decisions and financial information. Courts have routinely quashed subpoenas seeking confidential commercial information such as this. See *SPS Techs., LLC v. Briles Aero., Inc.*, 2019 U.S. Dist. LEXIS 241074 (C.D. Cal. June 24, 2019); *In re Subpoenas to Global Music Rights*, 2019 U.S. Dist. LEXIS 235809 (C.D. Cal. Jan. 18, 2019).

Corridor is a business partner who works with Rokoko on a project-by-project basis. The terms of those contracts are confidential. Naver Z is an investor in Rokoko and has signed a Shareholder Agreement, which is confidential. The only contractual relationship that exists between Trifork and Rokoko is the sale of interest in Coco Care. The details of that sale are confidential. The terms of all of these agreements have always been confidential and not available to the public.

Additionally, the information you request in one of your DocuSign subpoenas pertains to the personal emails of four individuals. None of the individuals are named parties to this case and they have an individual privacy right in the information requested. *Villanueva v. Cnty. of Los Angeles*, 2025 U.S. Dist. LEXIS 116120, at *4 (C.D. Cal. April 14, 2025) (“Federal courts ordinarily recognize a constitutionally-based right of privacy that can be raised in response to discovery requests.”). Accordingly, the Subpoenas seek information outside the bounds of proper discovery and must be withdrawn.

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EXHIBIT 2

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Defendant’s business partner, Corridor Digital is *the only* media outlet speaking about this case.

The screenshot shows a Google search interface with the following elements:

- Search Bar:** Contains the text "walsh v rokoko lawsuit -site:courtlistener.com -site:pacermonitor.com -site:justia.com -site:".
- Navigation:** Includes "AI Mode", "All", "Images", "News", "Videos", "Shopping", "Short videos", "More", and "Tools".
- Search Results:**
 - Reddit - r/Corridor:** A result highlighted with a red box. It includes the title "Rokoko Federal Fraud Lawsuit : r/Corridor" and a snippet: "His main point is that Rokoko monitors their mocap data, which is true, and always has been, since they moved to a cloud based service. He just ...".
 - Stretto:** A result with the title "UNITED STATES BANKRUPTCY COURT ..." and a snippet: "Sep 9, 2020 — As noted in the Original Declaration, Proskauer has conducted a general inquiry of Proskauer personnel (attorneys and staff) by electronic mail ...".
 - NZ Gazette:** A result with the title "Notice of Intention to Remove Companies From the Register" and a snippet: "Oct 16, 2025 — I intend to remove the following companies from the Register under section 318(1)(b) of the Companies Act 1993 on the grounds that the ...".
 - creativecirclecdn.com:** A result with the title "Martinez rebukes session criticisms" and a snippet: "Sep 2, 2011 — ... lawsuit filed by the Mexican American Legal Defense and Educational Fund. The lawsuit claimed Martinez's administration had wrongly ...".
 - Whaikaha - Ministry of Disabled People:** A result with the title "WELLINGTON: THURSDAY, 13 OCTOBER 2011" and a snippet: "Oct 13, 2011 — John McKay and Aaron Douglas Walsh, chartered accountants of Auckland, were appointed joint and several receivers and managers of the ...".

On the right side of the search results, the text "No further results." is displayed in red.

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EXHIBIT 3

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145 Defendant's told Corridor Digital to not accept service or allow service processors
 146 to go on site. They were extremely hostile to the processors. Someone finally let
 147 her in, but they left her in their office for nearly 3 hours.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Bar number, and address): Matthew Walsh <matthew@winteryear.com> matthew@winteryear.com TELEPHONE NO.: 661-644-0012 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): MATTHEW R. WALSH	<i>FOR COURT USE ONLY</i>
United States District Court, Central District of California STREET ADDRESS: 255 East Temple St. MAILING ADDRESS: 255 East Temple St. CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Edward R. Roybal Federal Building	
PLAINTIFF/PETITIONER: MATTHEW R. WALSH	CASE NUMBER:
DEFENDANT/RESPONDENT: ROKOKO ELECTRONICS; ET AL	2:25-cv-05340-ODW-RAO
DECLARATION OF NON SERVICE	Ref. No. or File No.: NF-22287

I declare that I am and was on the dates herein mentioned, over the age of 18 years, not a party to nor interested in the above entitled action, and competent to be a witness therein.

I received the following documents for service:
SUBPOENA

I attempted to serve **Corridor Digital, LLC c/o Jake Watson, REGISTERED AGENT**
 at the address of **2458 HUNTER STREET STUDIO 4, LOS ANGELES, CA 90021**

BY FAX

and was unable to effect service for the following reasons:
10/1/2025 10:10 AM: I was unable to deliver the documents due to a hostile environment. There's a doorbell that you rang and this guy opened the door and said I'm not welcome here and shut the door on my face, but someone else opened it for me afterwards and I went in and I rang the doorbell and no one answered it so these people are very shady in my opinion, but no one was there. I waited and that's kind of like hostile environment herebut no one is here and I waited from 9 o'clock and it's a 10 to 12 now.

Fee for service: \$ 75.00

I am a registered California process server; my name, address, phone number, and county of registration and number are:

Arica Ohanisian
 7892 Shadyspring Drive, Burbank, CA 91506
 818-434-2474
 Los Angeles , #2025115760

For: **ABC Legal Services, LLC**
 Registration #: **6779**
 County: **Los Angeles**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.

Date: 10/03/2025

 Arica Ohanisian
 (PRINTED NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

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Updates & Activity

Expand All | Collapse All

Filter By: **New!** All Activity Service Events (Only)

10/3/25 7:32 PM PDT Signed Proof of Non-Service: **Corridor Digital, LLC**
Address: 2458 HUNTER STREET STUDIO 4, LOS ANGELES, CA 90021

10/2/25 7:13 AM PDT Non-Service Confirmed: **Corridor Digital, LLC**
Address: 2458 Hunter St, Los Angeles, CA 90021-2536

Hostile Environment

10/1/25 11:42 AM PDT Message from **KM Kenneth M.**

Hello Matthew,
Thank you for reaching out. Due to the address being flagged as hostile, we're currently reviewing the situation and will provide an update shortly.
Thank you for your patience.
Best regards,
Kenneth M.
ABC Legal Customer Support

10/1/25 10:52 AM PDT Message from **MW Matthew W.**

They may not be shady or dangerous per se, this place is a famous podcast studio (Corridor Digital). They simply know they are getting pulled into court and want to try and dodge it.

10/1/25 10:10 AM PDT Service Attempted: **Corridor Digital, LLC** on 10/1/2025 10:10 AM PDT
Address: 2458 Hunter St, Los Angeles, CA 90021-2536

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10/1/25 10:10 AM PDT Service Attempted: **Corridor Digital, LLC** on 10/1/2025 10:10 AM PDT
Address: 2458 Hunter St, Los Angeles, CA 90021-2536

I was unable to deliver the documents due to a hostile environment. There's a doorbell that you rang and this guy opened the door and said I'm not welcome here and shut the door on my face, but someone else opened it for me afterwards and I went in and I rang the doorbell and no one answered it so these people are very shady in my opinion, but no one was there. I waited and that's kind of like hostile environment here but no one is here and I waited from 9 o'clock and it's a 10 to 12 now.

Server: **Arica Ohanisian** (3) GPS Coordinates: 34.027695, -118.22789

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