

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: WIKIPEDIA
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 Defendant has numerously claimed before the Court that Plaintiff is harassing
17 *them*. Those statements came with no evidence, no declarations, no proof of any
18 kind but were made to disparage his character and merit before the Court.

19 Defendant claimed Plaintiff was:

- 20 1. a defamer
- 21 2. a source of false information
- 22 3. a maker of false accusations
- 23 4. the creator of a “supposed lawsuit”

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25 Meanwhile, as this is occurring, Defendant is actively running a harassment
26 campaign on Wikipedia and through Corridor Digital’s 10M listeners.

- 27
28 1. **Exhibit 1** shows that Defendant Rokoko made permanent statements on
29 Wikipedia which are false, harassing and defamatory regarding the case and
30 Plaintiff.
- 31 2. **Exhibit 2** shows that the IP address of the poster(s) trace directly back to
32 Defendant’s “basement HQ office” in Copenhagen.
- 33 3. When confronted over the accusations herein, Defendant refused to deny it
34 in RFA’s:

35 a. **REQUEST FOR ADMISSION NO. 30.** Admit that when you stated
36 Plaintiff's allegations were fanciful, fabricated, or part of a harassment
37 campaign, those statements were rhetorical in nature and not
38 supported by any factual investigation.

39 i. **RESPONSE TO REQUEST FOR ADMISSION NO. 30.** “
40 *In addition to the General Objections set forth above, Rokoko*
41 *objects to the extent that this Request is overbroad as to scope*
42 *and time. Rokoko further objects that this Request is vague and*
43 *ambiguous insofar as it fails to provide enough specificity to*
44 *identify the source of the quoted language. Rokoko further*
45 *objects to the extent **that this Request seeks information***
46 ***protected by the work-product and/or attorney client privilege.***
47 *Rokoko further objects to the extent that this Request is vague*
48 *and ambiguous with respect to the terms rhetorical in nature*
49 *and supported. Rokoko further objects to the extent this Request*
50 *seeks an admission regarding Plaintiff's characterization of*
51 *statements made in litigation, which is completely unrelated to*
52 *any claims or defenses by any party to this action.”*

53 b. **REQUEST FOR ADMISSION NO. 6.** Admit that when Defendants
54 represented to the Court that “*this lawsuit was filed by Matthew R.*

55 *Walsh and is just the latest event in a long-standing harassment*
56 *campaign against Defendant”, Defendants had never reported to*
57 *Plaintiff, any law enforcement agency, or any regulatory authority that*
58 *they believed Defendant was being harassed by Plaintiff.*

59 *i. **RESPONSE TO REQUEST FOR ADMISSION NO. 6.** “In*
60 *addition to the General Objections set forth above, Rokoko*
61 *further objects to the extent this Request fails to identify with*
62 *specificity where or when the quoted statement was made, such*
63 *that Rokoko is unable to formulate a response or otherwise*
64 *admit in good faith. Rokoko further objects to the extent this*
65 *Request is overbroad as to scope and time, particularly with*
66 *respect to the term never reported. **Rokoko further objects to***
67 ***the extent this Request is vague and ambiguous with respect***
68 ***to the terms reported, law enforcement agency, or regulatory***
69 ***authority. Rokoko further objects that this Request is unduly***
70 ***burdensome and harassing.”***

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

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76 Executed this 9th day of December, 2025, in Santa Clarita, California.

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A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is written over a horizontal line.

Matthew R. Walsh
Plaintiff In Pro Per

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EXHIBIT 1

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86 From May 7, 2025 (the day Defendant hired ReedSmtih); Defendant made
87 permanent, public statements on Wikipedia which accuse Plaintiff of
88 “Defamation”, “false statements”, “false information”, “false accusations” and
89 further wished to cast doubt on the actual existence of the case by referring to it as
90 a “supposed lawsuit”.

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- (cur | prev) ○ 19:29, 3 September 2025 Sharleenbrando123 (talk | contribs) .. (3,745 bytes) (-1,474) .. (Undid revision 1309237140 by 172.115.94.32 (talk)) (undo) (Tags: Undo, Reverted, section blanking)
- (cur | prev) ○ 22:45, 2 September 2025 172.115.94.32 (talk) .. (5,219 bytes) (+1,474) .. (Undid revision 1302422369 by 2A02:AA7:411B:AFD6:F406:EB5B:122D:9DDF (talk)) (undo) (Tags: Undo, Reverted)
- (cur | prev) ○ 08:54, 25 July 2025 2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf (talk) .. (3,745 bytes) (-1,474) .. (Removed section on 'Legal Issues' as it pertains to an ongoing court case and was added by the plaintiff as defamation.) (undo) (Tags: Reverted, section blanking)
- (cur | prev) ○ 00:40, 24 July 2025 BattyBot (talk | contribs) .. (5,219 bytes) (+12) .. (Fixed reference date error(s) (see CS1 errors: dates for details) and AWB general fixes) (undo) (Tag: AWB)
- (cur | prev) ○ 19:04, 23 July 2025 172.115.94.32 (talk) .. (5,207 bytes) (0) .. (undo)
- (cur | prev) ○ 19:03, 23 July 2025 172.115.94.32 (talk) .. (5,207 bytes) (+46) .. (→Legal Issues) (undo)
- (cur | prev) ○ 19:02, 23 July 2025 172.115.94.32 (talk) .. (5,161 bytes) (+56) .. (undo)
- (cur | prev) ○ 18:59, 23 July 2025 172.115.94.32 (talk) .. (5,105 bytes) (+1,373) .. (undo) (Tag: Disambiguation links added)
- (cur | prev) ○ 04:51, 6 July 2025 AnomieBOT (talk | contribs) m .. (3,732 bytes) (+15) .. (Dating maintenance tags: {{Cn}}) (undo)
- (cur | prev) ○ 04:31, 6 July 2025 Kuru (talk | contribs) .. (3,717 bytes) (-237) .. (rmv non-WP:RS : vanity press; paid placement site) (undo)
- (cur | prev) ○ 07:41, 13 May 2025 Sharleenbrando123 (talk | contribs) m .. (3,954 bytes) (-810) .. (False information regarding an unsettled legal dispute removed.) (undo) (Tag: section blanking)
- (cur | prev) ○ 07:39, 13 May 2025 Sharleenbrando123 (talk | contribs) m .. (4,764 bytes) (-499) .. (→Legal Issues) (undo) (Tag: references removed)
- (cur | prev) ○ 13:46, 7 May 2025 FarmerUpbeat (talk | contribs) m .. (5,263 bytes) (+1,301) .. (Reverted edit by 2A02:AA7:4046:2D91:1CE9:EFF5:4232:A710 (talk) to last version by 172.115.94.32) (undo) (Tag: Rollback)
- (cur | prev) ○ 13:45, 7 May 2025 2a02:aa7:4046:2d91:1ce9:eff5:4232:a710 (talk) .. (3,962 bytes) (-1,301) .. (False accusations about legal violations and supposed lawsuits removed.) (undo) (Tags: Reverted, references removed)
- (cur | prev) ○ 19:50, 26 April 2025 172.115.94.32 (talk) .. (5,263 bytes) (+501) .. (added a section to legal troubles.) (undo)

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Defendant did this while also telling the Court that Plaintiff was running a “harassment campaign” against them, which is clearly the opposite. (Dkt #15, p.4, s.II)

II. STATEMENT OF RELEVANT FACTS

Defendant is an international brand of consumer motion capture and animation technology products. This lawsuit was filed by Matthew R. Walsh (“Plaintiff”) and is just the latest event in a long-standing harassment campaign against Defendant. The Complaint was filed May 12, 2025 in the Superior Court of California, County of Los Angeles. *See* Dkt. 3. The Complaint is 256 pages long including exhibits 80 pages without and has fourteen causes of action including fraudulent

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EXHIBIT 2

106 One of the IP addresses in question (“2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf”)

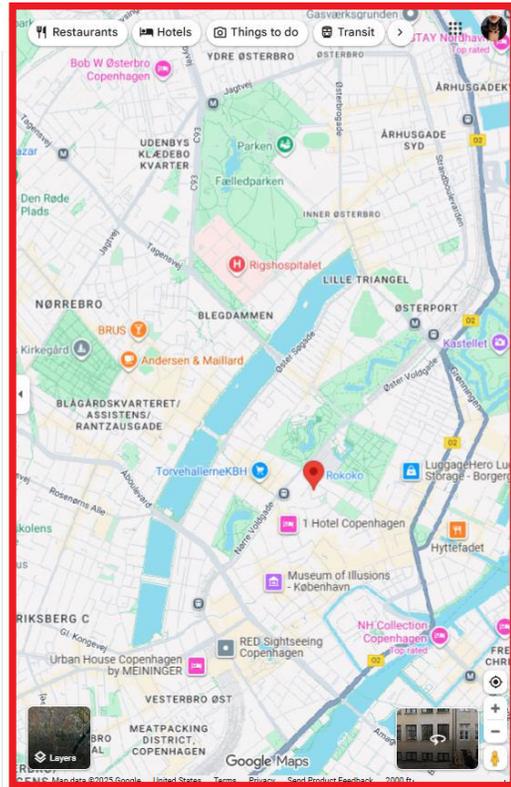
107 resolve to their “HQ” office.

GEOLOCATION HOME IP GEOLOCATION API FREE DATABASES



W3C Geolocation API Demo

Country Denmark 🇩🇰	Region Hovedstaden	City Copenhagen
ZIP or Postal Code 2450	Latitude 55.67594	Longitude 12.56553
ISP Hi3G Access AB	Domain Name hi3gaccess.se [WHOIS] [Check Mail Server]	Usage Type MOB
Weather View Weather	Time Zone Europe/Copenhagen	Local Time 2025-09-15T21:55:29+02:00
Address Type Unicast	Category Internet Technology	District Copenhagen Municipality
AS Number 44034	AS Name Hi3G Access AB	Hosted Domain -
Proxy	Proxy Provider	Fraud Score
Weather View Weather	Time Zone Europe/Copenhagen	Local Time 2025-09-15T21:55:29+02:00
Address Type Unicast	Category Internet Technology	District Copenhagen Municipality



Source: Google Maps

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