

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

Plaintiff In Pro Per,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MATTHEW R. WALSH
Plaintiff In Pro Per,
vs.

ROKOKO ELECTRONICS
(AND DOES 1 THROUGH 50,
INCLUSIVE)

Defendant

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

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

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

**DECLARATION OF MATTHEW R.
WALSH re: DEFAMATION ON
THE RECORD**

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.

1 1. The Defendant has claimed repeatedly throughout this case, both outside of
2 the Courtroom and within it, that Plaintiff's claims and evidence are
3 fabricated. It is true that Counsel may criticize pleadings, however, the
4 criticism must be grounded, it is not.

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7 2. Defendants refused to admit, deny or clarify any of their accusations:

8 3. **REQUEST FOR ADMISSION NO. 1.** Admit that when Defendants
9 represented to the Court that Plaintiff's exhibits were fabricated, Defendants
10 had not undertaken any effort to authenticate those exhibits, including but
11 not limited to verifying metadata, reviewing audit logs, or consulting with
12 any qualified expert.
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15 a. **RESPONSE TO REQUEST FOR ADMISSION NO. 1.** In
16 addition to the General Objections set forth above, Rokoko objects to
17 the extent that this Request is compound, vague and ambiguous, and
18 overbroad as to scope and time. Rokoko further objects to the extent
19 that this Request seeks information protected by the attorney-client
20 privilege and/or work-product doctrine. Rokoko further objects to the
21 extent that this Request is vague and ambiguous with respect to the
22 term "Plaintiff's exhibits". Rokoko further objects to the extent that
23 this Request seeks information that is irrelevant to any claims or
24 defenses of any party to this action. Rokoko further objects to the
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1 extent the Request calls for a legal conclusion or is the subject of
2 premature expert discovery. Subject to and without waiving any of its
3 objections, Rokoko responds as follows: Denied.
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5 4. **REQUEST FOR ADMISSION NO. 30.** Admit that when you stated
6 Plaintiff's allegations were fanciful, fabricated, or part of a harassment
7 campaign, those statements were rhetorical in nature and not supported by
8 any factual investigation.
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11 a. **RESPONSE TO REQUEST FOR ADMISSION NO. 30.** In
12 addition to the General Objections set forth above, Rokoko objects to
13 the extent that this Request is overbroad as to scope and time. Rokoko
14 further objects that this Request is vague and ambiguous insofar as it
15 fails to provide enough specificity to identify the source of the quoted
16 language. Rokoko further objects to the extent that this Request seeks
17 information protected by the work-product and/or attorney client
18 privilege. Rokoko further objects to the extent that this Request is
19 vague and ambiguous with respect to the terms "rhetorical in nature"
20 and "supported". Rokoko further objects to the extent this Request
21 seeks an admission regarding Plaintiff's characterization of statements
22 made in litigation, which is completely unrelated to any claims or
23 defenses by any party to this action.
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1 5. **REQUEST FOR ADMISSION NO. 31.** Admit that Counsel Emily Graue,
2 Katherine J. Ellena, Michael Galibois and Heather Valencia do not possess
3 the technical capability to interpret or reproduce the forensic evidence
4 Plaintiff has placed before this Court.
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6 a. **RESPONSE TO REQUEST FOR ADMISSION NO. 31**
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8 In addition to the General Objections set forth above, Rokoko objects
9 that this Request is improperly compound insofar as it seeks an
10 admission regarding the ambiguously described capabilities of four
11 separate individuals. Rokoko further objects to the extent that this
12 Request is vague and ambiguous with respect to the terms “technical
13 capability”, “interpret”, and “reproduce”. Rokoko further objects that
14 this Request fails to identify the evidence Plaintiff has placed before
15 the Court with sufficient specificity for Rokoko to admit in good faith.
16 Rokoko further objects to the extent this Request is overbroad as to
17 scope and time. Rokoko further objects to the extent that this Request
18 seeks information protected by the work-product doctrine and/or
19 attorney-client privilege. Rokoko further objects that information
20 regarding the interpretation of facts and evidence by Reed Smith LLP
21 employees is not relevant to any claims or defenses of any party in
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1 this action and protected by the work-product and/or attorney-client
2 privilege
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4 6. **REQUEST FOR ADMISSION NO. 33.** Admit that Counsel Emily Graue,
5 Katherine J. Ellena, Michael Galibois, and Heather Valencia do not possess
6 the technical expertise to conduct or analyze cybersecurity methods,
7 including but not limited to man-in-the-middle (MITM) captures, packet
8 sniffing, proxy redirection, metadata extraction, or multi-protocol
9 communication analysis.
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12 a. **RESPONSE TO REQUEST FOR ADMISSION NO. 33.** In
13 addition to the General Objections set forth above, Rokoko objects
14 that this Request is improperly compound insofar as it seeks
15 information regarding the ambiguously defined expertise of four
16 separate individuals. Rokoko further objects that this Request is vague
17 and ambiguous with respect to the terms “technical expertise”,
18 “conduct”, and “analyze”. Rokoko further objects to the extent that
19 this Request is vague and ambiguous with respect to the litany of
20 undefined technical terms contained within. Rokoko further objects
21 that this Request is overbroad as to scope and time. Rokoko further
22 objects that information regarding the interpretation of facts and
23 evidence by Reed Smith LLP employees is not relevant to any claims
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1 or defenses of any party in this action and protected by the work-
2 product and/or attorney-client privilege. Rokoko further objects to the
3 extent that this Request is duplicative of Request Nos. 31 and 32.
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5 **7. REQUEST FOR ADMISSION NO. 34** Admit that no attorney at Reed
6 Smith has performed any cybersecurity analysis of Plaintiff's evidence in
7 this case.
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9 a. **RESPONSE TO REQUEST FOR ADMISSION NO. 34.** In
10 addition to the General Objections set forth above, Rokoko further
11 objects that this Request is vague and ambiguous with respect to the
12 terms performed, and analysis. Rokoko further objects that this
13 Request is overbroad, vague, and ambiguous insofar as it fails to
14 sufficiently identify the Plaintiff's evidence referenced. Rokoko
15 further objects that this Request is overbroad as to scope and time,
16 particularly with the usage of the terms "no attorney" and "any . . .
17 analysis". Rokoko further objects that information regarding the
18 interpretation of facts and evidence by Reed Smith LLP employees is
19 not relevant to any claims or defenses of any party in this action and
20 protected by the work-product and/or attorney-client privilege.
21 Rokoko further objects to the extent that this Request is duplicative of
22 Request Nos. 31, 32, and 33.
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1 8.

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

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6 Executed this 10th day of November, 2025, in Santa Clarita, California.
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11 Matthew R. Walsh
12 Plaintiff In Pro Per
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