

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: FORGED
SIGNATURES**

8
9

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

15

16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35

1. As demonstrated in **(Exhibit 1)**, Emily Graue forged Katherine J. Ellena’s signature and authored documents on her behalf with no pro hac vice admission and even after being removed from docket.

2. **(Exhibit 2)** demonstrates that this has been the case across multiple filings.

3. **NOTICE OF NON-OPPOSITION:** This evidence has never been disputed, controverted or disproved in the six months this case has been active. Defendant’s did not deny it in the RFA’s provided to them (Dkt #80-2), in fact, they provided the following objection:
 - a. **REQUEST FOR ADMISSION NO. 2.** Admit that attorney Emily Graue affixed the typed signature /s/ Katherine J. Ellena to one or more PDF filings in this action.
 - i. *“In addition to the General Objections set forth above, Rokoko further objects to the extent that the information sought by this Request is not relevant to the claims of either party. Rokoko further objects to the extent that this Request seeks information protected by attorney-client privilege, work product doctrine, or another applicable privilege. Rokoko further objects to the*

36
37
38
39
40
41
42
43
44
45

extent that this Request is vague and ambiguous as to which PDF filings Plaintiff is referring.”

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

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



Matthew R. Walsh
Plaintiff In Pro Per

46

47

48

49

50

51

EXHIBIT 1

52 Evidence of signature forgery, ghostwriting by Emily Graue and placing the
53 signature of Katherine J. Ellena.

54

55 Step 1: extract the PDF metadata.

```

Command Prompt
Microsoft Windows [Version 10.0.19045.6332]
(c) Microsoft Corporation. All rights reserved.

C:\Users\Matt>chdir C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata

C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata>exiftool -a -G -s "Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.pdf"
[ExifTool] ExifToolVersion : 13.31
[File] FileName : Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.pdf
[File] Directory : .
[File] FileSize : 2.4 MB
[File] ZoneIdentifier : Exists
[File] FileModifyDate : 2025:06:20 12:53:02-07:00
[File] FileAccessDate : 2025:09:15 14:51:02-07:00
[File] FileCreateDate : 2025:06:20 12:53:02-07:00
[File] FilePermissions : -rw-rw-rw-
[File] FileType : PDF
[File] FileTypeExtension : pdf
[File] MIMEType : application/pdf
[PDF] PDFVersion : 1.7
[PDF] Linearized : No
[PDF] HasXFA : No
[PDF] PageCount : 4
[PDF] CreateDate : 2025:06:12 16:29:15-04:00
[PDF] ModifyDate : 2025:06:12 17:35:00-04:00
[PDF] Creator : Aspose Ltd.
[PDF] Producer : Aspose.PDF for .NET 22.6.0
[XMP] Format : application/pdf
[XMP] CreateDate : 2025:06:12 16:29:15-04:00
[XMP] ModifyDate : 2025:06:12 14:06:20-07:00
[XMP] MetadataDate : 2025:06:12 14:06:20-07:00
[XMP] DocumentID : uuid:829740b1-222b-4a73-96b8-7c2bfe583510
[XMP] InstanceID : uuid:57fef664-970b-4812-b5e8-0d5354529551
[XMP] HistoryAction : editedScannedDoc
[XMP] HistoryWhen : 2025:06:12 14:06:20-07:00
[XMP] HistoryParameters : Page:1

C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata>

```

56

57

58

59

60 Step 2: analyze and notice the last edits were in -04:00 timezone (Eastern/Chicago)
 61 this was found in all documents bearing Katherine J. Ellena's signature; which
 62 would be impossible if *she* was the signer as her timezone is -07:00 (Pacific/Los
 63 Angeles)
 64

<p>Ellena Declaration ISO Ex Parte.txt - Notepad</p> <pre> File Edit Format View Help Create Date : 2025:06:16 17:44:16-07:00 Metadata Date : 2025:06:16 18:04:27-07:00 Document ID : uuid:fb7503a3-9f07-4746-898 Instance ID : uuid:2ca74679-ee1f-43d6-860 Page Count : 10 Embedded Image Color Space : DeviceRGB Embedded Image Filter : DCTDecode Embedded Image Height : 373 Embedded Image Width : 1846 Embedded Image : (Binary data 34930 bytes, use File Type : JPEG File Type Extension : jpg MIME Type : image/jpeg JFIF Version : 1.01 Resolution Unit : inches X Resolution : 96 Y Resolution : 96 Image Width : 1846 Image Height : 373 Encoding Process : Baseline DCT, Huffman coding Bits Per Sample : 8 Color Components : 3 Y Cb Cr Sub Sampling : YCbCr4:2:0 (2 2) Embedded Image Color Space : DeviceGray Embedded Image Filter : FlateDecode Embedded Image Height : 5 Embedded Image Width : 5 File Type : (unsupported) Embedded Image Color Space : Indexed, DeviceRGB, 255 Embedded Image Filter : FlateDecode Embedded Image Height : 40 Embedded Image Width : 180 File Type : (unsupported) Create Date : 2025:06:16 17:44:16-07:00 Modify Date : 2025:06:16 21:26:52-04:00 Creator : Aspose Ltd. Producer : Aspose.PDF for .NET 22.6.0 Image Size : 1846x373 Megapixels : 0.689 </pre>	<p>Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.txt - Notepad</p> <pre> File Edit Format View Help File Type Extension : jpg MIME Type : image/jpeg DCT Encode Version : 100 APP14 Flags 0 : (none) APP14 Flags 1 : (none) Color Transform : Unknown (RGB or CMYK) Image Width : 1275 Image Height : 1650 Encoding Process : Baseline DCT, Huffman coding Bits Per Sample : 8 Color Components : 1 Embedded Image Color Space : DeviceGray Embedded Image Filter : DCTDecode Embedded Image Height : 88 Embedded Image Width : 400 Embedded Image : (Binary data 4009 bytes, use -b op File Type : JPEG File Type Extension : jpg MIME Type : image/jpeg DCT Encode Version : 100 APP14 Flags 0 : (none) APP14 Flags 1 : (none) Color Transform : Unknown (RGB or CMYK) Image Width : 400 Image Height : 88 Encoding Process : Baseline DCT, Huffman coding Bits Per Sample : 8 Color Components : 1 Embedded Image Color Space : Indexed, DeviceRGB, 255 Embedded Image Filter : FlateDecode Embedded Image Height : 40 Embedded Image Width : 180 File Type : (unsupported) Create Date : 2025:06:12 16:29:15-04:00 Modify Date : 2025:06:12 17:35:00-04:00 Creator : Aspose Ltd. Producer : Aspose.PDF for .NET 22.6.0 Image Size : 1275x1650 Megapixels : 2.1 </pre>
---	--

Ellena Declaration ISO Ex Parte

Civil Cover Sheet bearing Katherine's signature

65

<p>Ex Parte Motion for Extension of Time.txt - Notepad</p> <pre> File Edit Format View Help ExifTool Version Number : 13.31 File Name : Ex Parte Motion for Extension Directory : . File Size : 212 kB Zone Identifier : Exists File Modification Date/Time : 2025:06:20 15:31:52-07:00 File Access Date/Time : 2025:06:20 15:43:57-07:00 File Creation Date/Time : 2025:06:20 15:31:52-07:00 File Permissions : -rw-rw-rw- File Type : PDF File Type Extension : pdf MIME Type : application/pdf PDF Version : 1.6 Linearized : Yes Create Date : 2025:06:16 17:26:27-07:00 Modify Date : 2025:06:16 21:26:52-04:00 Creator : Aspose Ltd. Producer : Aspose.PDF for .NET 22.6.0 Has XFA : No Create Date : 2025:06:16 17:26:27-07:00 Modify Date : 2025:06:16 17:56:48-07:00 Metadata Date : 2025:06:16 17:56:48-07:00 Format : application/pdf Document ID : uuid:1122b6c7-e29b-4ea8-b309-d Instance ID : uuid:9722d856-8257-4aa9-a0d3-d Page Count : 8 Embedded Image Color Space : Indexed, DeviceRGB, 255 Embedded Image Filter : FlateDecode Embedded Image Height : 40 Embedded Image Width : 180 File Type : (unsupported) </pre>	<p>Rokoko - 2025-06-12 Notice of Removal - AS FILED.txt - Notepad</p> <pre> File Edit Format View Help Embedded Image Color Space : DeviceRGB Embedded Image Filter : DCTDecode Embedded Image Height : 148 Embedded Image Width : 150 Embedded Image : (Binary data 17960 bytes, use File Type : JPEG File Type Extension : jpg MIME Type : image/jpeg JFIF Version : 1.02 Resolution Unit : None X Resolution : 100 Y Resolution : 100 Quality : 100% DCT Encode Version : 100 APP14 Flags 0 : [14], Encoded with Blend-1 dow APP14 Flags 1 : (none) Color Transform : YCbCr Image Width : 150 Image Height : 148 Encoding Process : Baseline DCT, Huffman coding Bits Per Sample : 8 Color Components : 3 Y Cb Cr Sub Sampling : YCbCr4:4:4 (1 1) Embedded Image Color Space : Indexed, DeviceRGB, 27 Embedded Image Filter : FlateDecode Embedded Image Height : 87 Embedded Image Width : 246 File Type : (unsupported) Embedded Image Color Space : Indexed, DeviceRGB, 255 Embedded Image Filter : FlateDecode Embedded Image Height : 40 Embedded Image Width : 180 File Type : (unsupported) Create Date : 2025:06:12 10:24:49-07:00 Modify Date : 2025:06:12 17:35:00-04:00 Creator : Aspose Ltd. Producer : Aspose.PDF for .NET 22.6.0 Image Size : 1105x1430 Megapixels : 1.6 </pre>
---	---

Ex-parte motion for extension of time

Notice of removal

66

69 Step 3: Analyze e-mail headers from the attorneys and see who matches that -04:00
70 timezone. Emily Graue (Chicago based) was the only match.
71

Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing - Message (HTML)

File Message Help

Delete Archive Reply Reply All Forward Respond All Apps

Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing

Graue, Emily H. <EGraue@reedsmith.com>
 To: matthew@winteryear.com
 Cc: Galibois, Michael B.; Ellena, Katherine J.
 You replied to this message on 6/16/2025 2:46 PM.

Mr. Walsh,

Defendant Rokoko Electronics, via counsel Reed Smith LLP pursuant to Local Rule 8-3. This was also indicated when we let us know if you have any questions or would like to discuss.

Best,

Emily Graue
 Associate
 Global Commerical Disputes
 She/Her/Hers

EGraue@reedsmith.com
 D: +1 312 207 2954
 M: +1 630 895 1773

Reed Smith
 10 South Wacker Drive

Properties

Settings: Importance: Normal, Sensitivity: Normal, Do not AutoArchive this item

Security: Encrypt message contents and attachments, Add digital signature to outgoing message, Request S/MIME receipt for this message

Tracking options: Request a delivery receipt for this message, Request a read receipt for this message

Delivery options: Have replies sent to, Expires after: None, 12:00 AM

Internet headers: (mail-westcentralusazon11023081.outbound.protection.outlook.com [40.93.201.81]) by relay.mimecast.com with ESMTP with STARTTLS (version=TLSv1.2, cipher=TLS_AES_256_GCM_SHA384) id us-mta-98-un4mOiQ5Me6DEWbYIKlqMg-2; Mon, 16 Jun 2025 17:14:59 -0400 X-MS-Exchange-Organization: un4mOiQ5Me6DEWbYIKlqMg-2 Received: from DS7PR03MB5607.namprd03.prod.outlook.com

72
73

74
75

Truncated e-mail header:

76
77

78
79

80
81

82
83

84
85

86
87

88
89
90

```

Return-Path: <egraue@reedsmith.com>
Delivered-To: matthew@winteryear.com
Received: from gator3161.hostgator.com
    by gator3161.hostgator.com with LMTP
    id IE7VG2OJUGhxJwgANiI7Wg
    (envelope-from <egraue@reedsmith.com>)
    for <matthew@winteryear.com>; Mon, 16 Jun 2025 16:15:15 -0500
Return-path: <egraue@reedsmith.com>
Envelope-to: matthew@winteryear.com
Delivery-date: Mon, 16 Jun 2025 16:15:15 -0500
Received: from us-smtp-delivery-164.mimecast.com ([170.10.133.164]:45523)
    by gator3161.hostgator.com with esmtps (TLS1.2) tls
    TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384
  
```

91 (Exim 4.98.1)
92 (envelope-from <egraue@reedsmith.com>)
93 id 1uRHAh-000000021IR-1EAK
94 for matthew@winteryear.com;
95 Mon, 16 Jun 2025 16:15:15 -0500
96 DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=reedsmith.com;
97 s=mimecast20171211; t=1750108503;
98 h=from:from:reply-to:subject:subject:date:date:message-id:message-id:
99 to:to:cc:cc:mime-version:mime-version:content-type:content-type;
100 bh=F36B5ycb/3sAzfpI/Pvc5kxaG7DE7kJ06Wr0VgGt6cM=;
101 b=AfwCTaVCvAMqknau97sCd+4HEbptBwreQpM2SjDUz8IJN3PaMI93Xb7IJXM5pqX8bMVyv
102 k
103 NRFZGMIS783RbS2dAuQcCumrNaIEY2xkZj1wbC3h/pYVdfsLVOgjESASNLQV5vAuOrFpQj
104 win6XCE11Gtyb1kfwyqCVsz6LgPEj92MA84BWZyi2rmqKsE8RzIBONeC/gS25P6EVqiic1
105 GGmi7KZ3Hrlp/PDw++SZ364n+lvjpnGVAR0hEkEkT3FW2cATx/oPAB1L9HXTb73oIfppqL
106 XFztuWe9K3DAY/A/FIm2aBBKzmeFP6aahokvWK8fKE3SUdCQvrfmCZhcWVY2Kw==
107 Received: from CY3PR05CU001.outbound.protection.outlook.com
108 (mail-westcentralusazon11023081.outbound.protection.outlook.com
109 [40.93.201.81]) by relay.mimecast.com with ESMTP with STARTTLS
110 (version=TLSv1.3, cipher=TLS_AES_256_GCM_SHA384) id
111 us-mta-98-un4mOiQ5Me6DEWbYIKIqMg-2; **Mon, 16 Jun 2025 17:14:59 -0400**
112 X-MC-Unique: un4mOiQ5Me6DEWbYIKIqMg-2
113 X-Mimecast-MFC-AGG-ID: un4mOiQ5Me6DEWbYIKIqMg_1750108498
114 Received: from DS7PR03MB5607.namprd03.prod.outlook.com (2603:10b6:5:2ce::21)
115 by CO1PR03MB5875.namprd03.prod.outlook.com (2603:10b6:303:90::21) with
116 Microsoft SMTP Server (version=TLS1_2,
117 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8835.29; Mon, 16 Jun
118 2025 21:14:54 +0000
119 Received: from DS7PR03MB5607.namprd03.prod.outlook.com
120 ([fe80::a0e4:2ab9:62a7:6eb1]) by DS7PR03MB5607.namprd03.prod.outlook.com
121 ([fe80::a0e4:2ab9:62a7:6eb1%5]) with mapi id 15.20.8835.025; Mon, 16 Jun
122 2025
123 21:14:53 +0000
124 From: "Graue, Emily H." <EGraue@reedsmith.com>
125 To: "matthew@winteryear.com" <matthew@winteryear.com>
126 CC: "Galibois, Michael B." <MGalibois@reedsmith.com>, "Ellena, Katherine J."
127 <Kellena@reedsmith.com>
128 Subject: Notice - Ex Parte Application for Additional Time to Respond to the
129 Complaint Filing
130 Thread-Topic: Notice - Ex Parte Application for Additional Time to Respond to
131 the Complaint Filing
132 Thread-Index: AdvfA5Uklv7cx5VoQcyLq5hhadjj1w==
133 Date: Mon, 16 Jun 2025 21:14:53 +0000

134

135

136

137

138

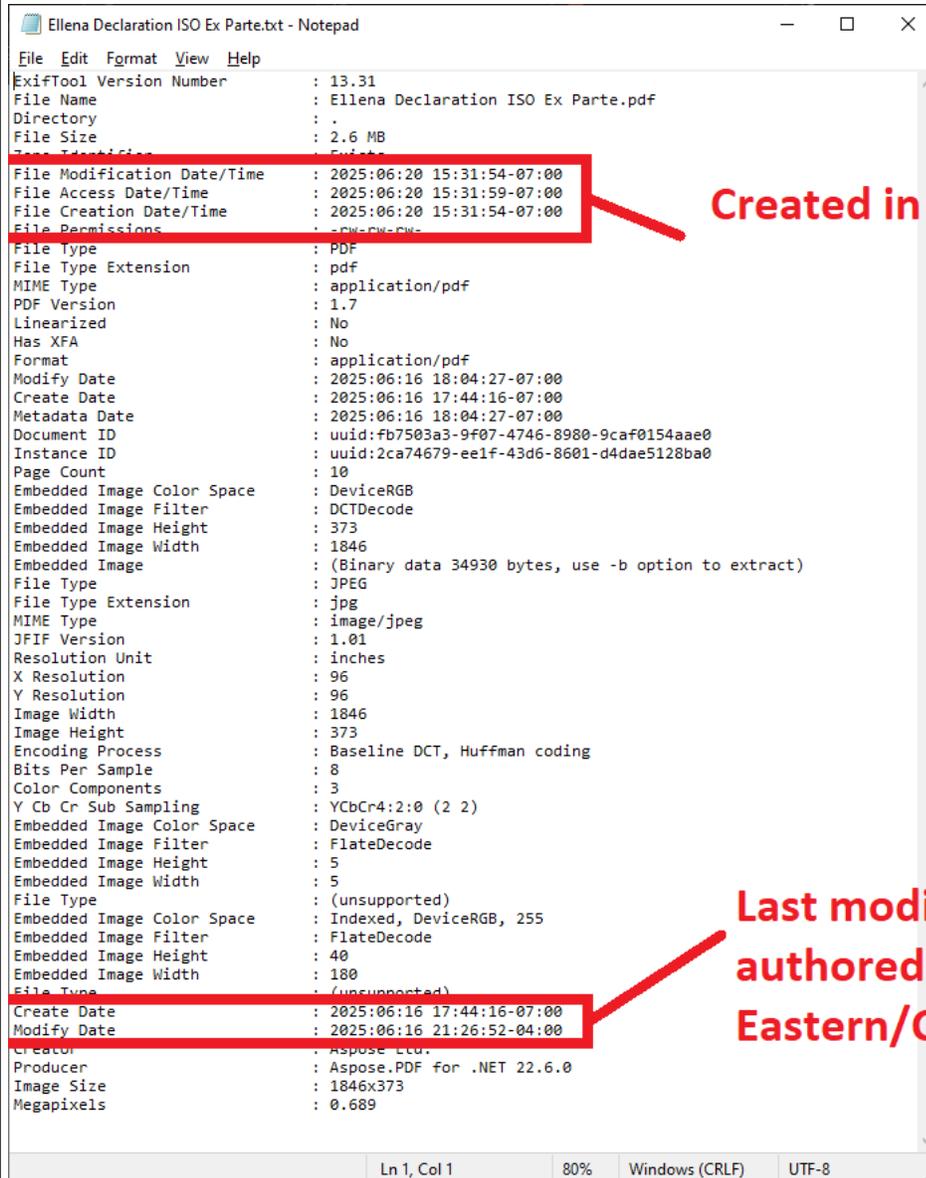
139

140

EXHIBIT 2

141

142 Katherine J. Ellena’s personal declaration was drafted by Emily Graue with no pro
143 hac vice status and Katherine J. Ellena’s signature placed by her.



Created in Los Angeles

Last modified and
authored over hours in
Eastern/Chicago

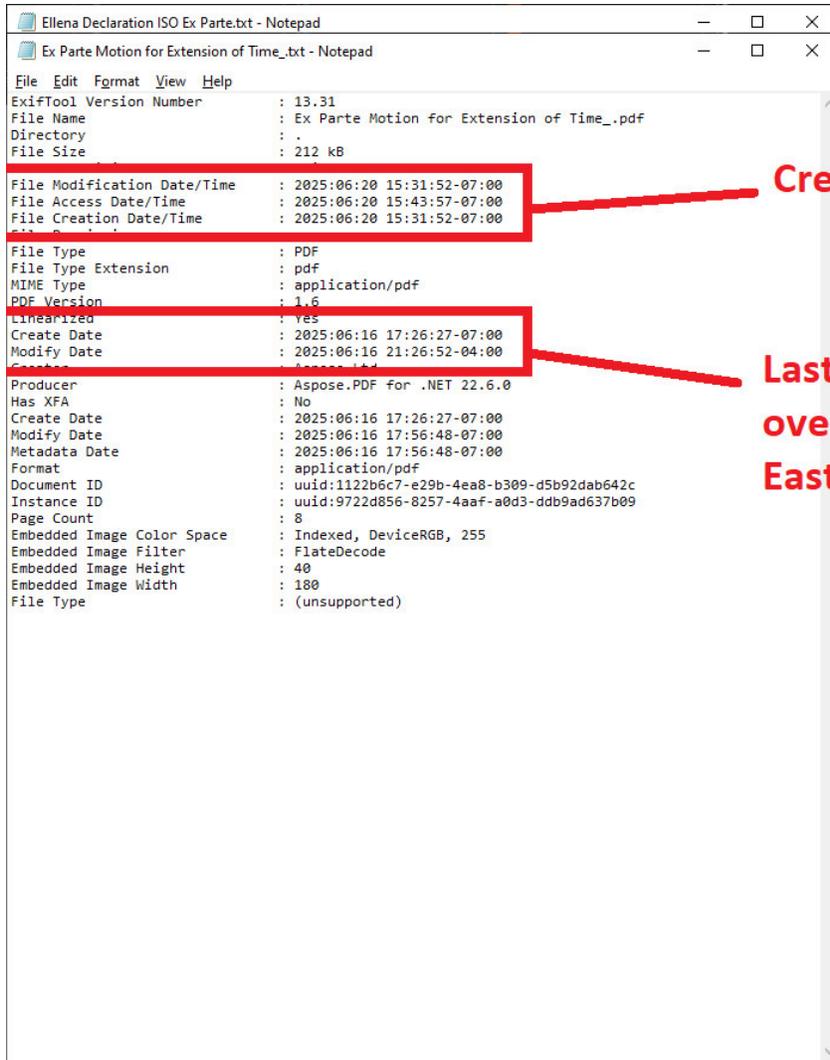
144

145

146

147

148 The Ex-Parte Motion for Extension of Time was drafted by Emily Graue with no
149 pro hac vice status and Katherine J. Ellena's signature placed by her.



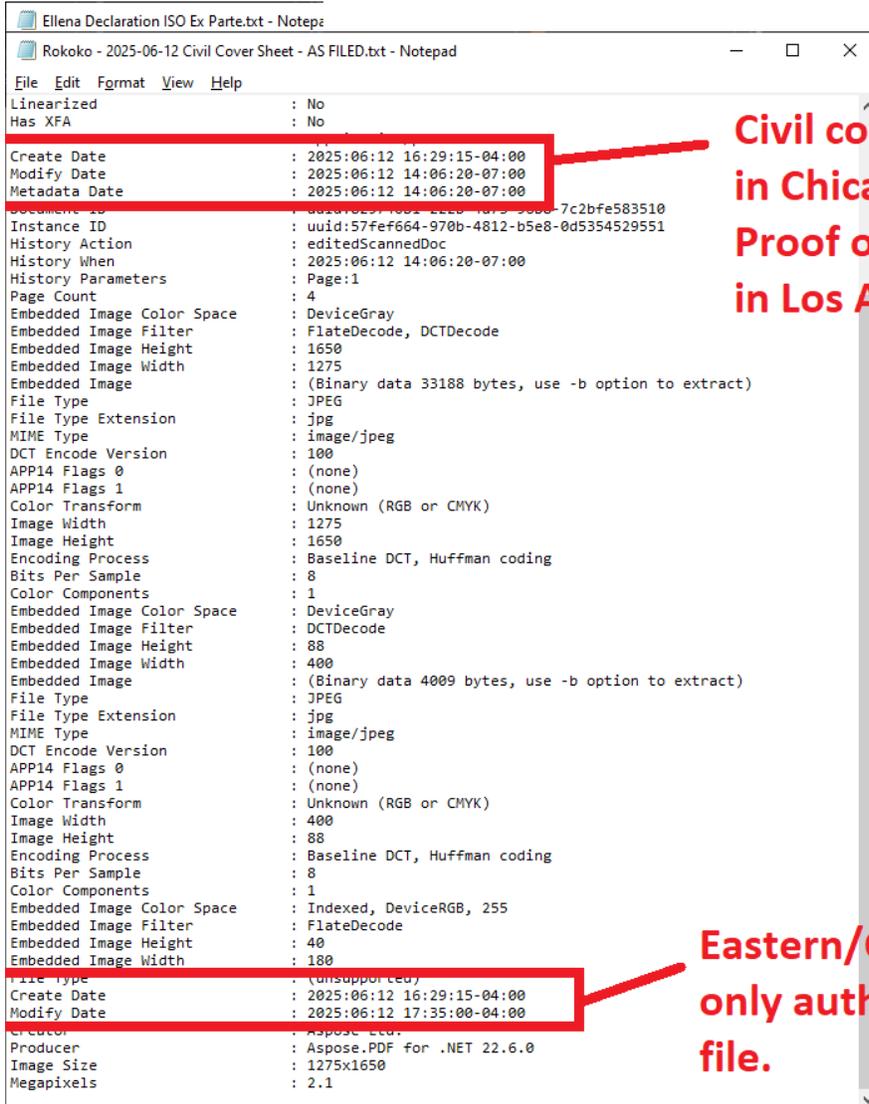
Created in Los Angeles

**Last modified and written
over hours in
Eastern/Chicago**

150

151

152 Civil Cover sheet for Removal to Federal Court was authored by Emily Graue (no
153 pro hac vice); who placed Michael Galibois' name on the file (no pro hac vice) and
154 then signed Katherine J. Ellena's name.



Civil cover sheet authored in Chicago
Proof of service scanned in Los Angeles then filed.

Eastern/Chicago was the only author/changes to the file.

155

156

157 Notice of Removal to Federal Court was authored by Emily Graue (no pro hac
158 vice); who then signed Katherine J. Ellena’s name.



**Notice of removal
created in Los Angeles
but then sent to
Eastern/Chicago and
finished over hours.**

159