

FILED

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

2025 JUN 13 PM 2:22

Plaintiff In Pro Per,

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
BY *Ryo*

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

MATTHEW R. WALSH  
19197 GOLDEN VALLEY RD #333  
SANTA CLARITA, CA 91387,

Case No.: 2:25-CV-5340 · *ODW(RAOx)*

Plaintiff In Pro Per,

**NOTICE OF MOTION AND MOTION TO  
SHORTEN TIME TO HEAR PLAINTIFFS  
MOTION TO REMAND**

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50, INCLUSIVE)  
31416 AGOURA RD STE 118  
WESTLAKE VILLAGE, CA  
91361

Defendant

**NOTICE OF MOTION AND MOTION TO SHORTEN TIME TO HEAR  
PLAINTIFFS MOTION TO REMAND**

TO ALL PARTIES AND TO THE COURT:

**PLEASE TAKE NOTICE** that Plaintiff MATTHEW R. WALSH hereby moves the Court to shorten the time for hearing Plaintiff's pending Motion to Remand.

1 Plaintiff respectfully requests that the Court schedule the hearing on the Motion to  
2 Remand as soon as possible, or alternatively, take the motion under submission without oral  
3 argument pursuant to Local Rule 7-15.

4  
5 This motion is made pursuant to Local Rule 6-1 and is based on this notice, the  
6 attached memorandum of points and authorities, the record in this case, and such evidence and  
7 argument as may be presented.

8  
9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10  
11 **INTRODUCTION**

12  
13 Plaintiff respectfully requests that the Court shorten the time for hearing  
14 Plaintiff's Motion to Remand due to prejudice that will result from delays. Plaintiff is facing  
15 deadlines related to dispositive motions and discovery, and jurisdictional uncertainty interferes  
16 with Plaintiff's ability to comply.

17 **LEGAL STANDARDS**

18  
19 Under Local Rule 6-1 and the Court's authority to manage its docket, the Court  
20 may shorten time for good cause shown. Courts routinely do so where delay would cause  
21 prejudice or procedural unfairness.

22  
23 **1. GOOD CAUSE EXISTS TO SHORTEN TIME**

24 Plaintiff's Motion to Remand addresses significant jurisdictional, factual and potentially  
25 sanctionable defects. Until the Court resolves that motion, Plaintiff is:

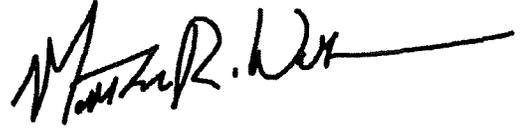
- 26 **a.** Unable to proceed in state court;

- 1           **b.** Subject to conflicting or inappropriate federal deadlines; and
- 2
- 3           **c.** Facing potential loss of procedural rights under state court rules.
- 4
- 5           **d.** There is ongoing tortious interference with economic harm, which is a major
- 6           cause of action in the Case. Each delay harms and damages Plaintiff
- 7           incrementally.
- 8
- 9           **e.** In the state matter, Defendant has generally appeared and has been engaged in
- 10           legal/settlement discussions since about September 2024, over 200 days of
- 11           attempted mutual resolution; alone enough to satisfy *H.F. Livermore Corp. v.*
- 12           *Aktiengesellschaft Gebruder Loepfe*, 432 F.2d 689, 692 (D.C.Cir.1970) which
- 13           found “75 days of settlement discussions constitute appearance”
- 14           **f.** Defendant waited until the 30<sup>th</sup> day from personal service, 45<sup>th</sup> day from general
- 15           appearance after filing no responsive pleading, no objections and no dispositive
- 16           motions in that case, despite being served continuously in the matter and engaging
- 17           in bidirectional case-related discussions and settlement discussions.
- 18           **g.** Plaintiff has propounded discovery (unanswered), filed a Motion for Summary
- 19           Judgment in Lieu of Default (unopposed) and the Court has calendared that
- 20           hearing for September 11, 2025. Plaintiff is concerned that uncertainty regarding
- 21           jurisdiction will undermine the validity or timing of that motion, along with
- 22           related discovery deadlines and unfairly prejudice Plaintiff and the case he has
- 23           built.

24           **2. CONCLUSION**

1 For these reasons, Plaintiff respectfully requests that the Court shorten the time to  
2 hear the Motion to Remand or take it under submission as soon as briefing is complete.

3  
4 Dated this 12<sup>th</sup> of June, 2025

5  
6 

7  
8 \_\_\_\_\_  
9 Matthew R. Walsh  
10 Plaintiff In Pro Per