

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

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

Plaintiff In Pro Per,

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

vs.

ROKOKO ELECTRONICS
(AND DOES 1 THROUGH 50,
INCLUSIVE)

Hearing Date: February 18, 2026
Time: 10:00 AM
Department/Judge: Hon. Oliver,
Courtroom 590

Defendant

**PERSONAL DECLARATION OF
MATTHEW R. WALSH re:
EVIDENTIARY PACKAGE**

8
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.
14

15 **Exhibit 1** is an image showing that the Defendant’s objections are the de facto
16 standard, almost word for word, for what Federal Courts determined is
17 ‘boilerplate’ and tantamount to no objection at all.

18
19 I declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct.

21
22 I declare under penalty of perjury under the laws of the United States of America
23 that the foregoing is true and correct.

24
25 Executed this January 16, 2026, in Santa Clarita, California.

26 

Matthew R. Walsh
Plaintiff In Pro Per

27

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32

EXHIBIT 1

33 Defendant's precise wording is continually referenced in Federal Cases as
34 unacceptable.

nextwestlaw.com/Document/1b2064d653d4119b17ee4cd604a702/View/FullText.html?navigationPath=Search%2Fv1%2Fresults%2Fnavigation...

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All Content "ODW-RAO" & "boilerplate" & "objection"

St. Paul Reinsurance Co., Ltd. v. Commercial Financial Corp.
United States District Court, N.D. Iowa, Western Division November 22, 2000 198 F.R.D. 508 48 Fed.R.Serv.3d 1232 (Approx. 17 pages)

Document Filings (1) Negative Treatment (0) History (4) Citing References (2,564) Table of Authorities Powered by KeyCite

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DOCUMENT REQUEST NO 1: All documents identified, or relied on, in your answers to Counterclaim Plaintiff's First Set of Interrogatories Directed to Counterclaim Defendant.

OBJECTIONS TO DOCUMENT REQUEST NO. 1: St. Paul objects to this request on the ground that the request is oppressive, burdensome and harassing. St. Paul further objects to this request on the ground that it is vague, ambiguous and unintelligible. St. Paul further objects that the request is overbroad and without reasonable limitation in scope or time frame. St. Paul further objects that the request seeks information that is protected from disclosure by the attorney-client privilege, the attorney work product doctrine and/or the joint interest or joint defense privilege. St. Paul further objects to this request on the ground that the request seeks information and documents equally available to the propounding parties from their own records or from records which are equally available to the propounding parties. St. Paul further objects that this request fails to designate the documents to be produced with reasonable particularity.²

6 In every respect these objections are text-book examples of what federal courts have routinely deemed to be improper objections. Indeed, an individual examination of the above-mentioned objections is instructive. ⁵13 The first objection asserted by the plaintiffs to CFC's "Document Request No. 1" is that it is oppressive, burdensome and harassing. Plaintiffs assert these objections, however, without explaining, much less substantiating, how CFC's request is oppressive, burdensome and harassing. See *Redland Soccer Club, Inc. v. Department of the Army*, 55 F.3d 827, 856 (3d Cir.1995) (stating that the mere statement by a party that the interrogatory was overly broad, burdensome, oppressive and irrelevant is not adequate to voice a successful objection to an interrogatory and that instead, the party resisting discovery must show specifically how each interrogatory is not relevant or how each question is overly broad, burdensome or oppressive) (citation omitted); see also *McLeod, Alexander, Powell & Apffel, P.C. v. Quarles*, 894 F.2d 1482, 1485 (5th Cir.1990) (stating that the "party resisting discovery must show specifically how ... each interrogatory is not relevant or how each question is overly broad, burdensome or oppressive" and then stating that "[w]e see no reason to distinguish the standards governing responses to interrogatories from those that govern responses to production requests.") (citation omitted). Plaintiffs next object that CFC's document request is vague, ambiguous and unintelligible. Similarly, plaintiffs assert these boilerplate objections and fail to substantiate how CFC's request is vague, ambiguous and unintelligible. *Paulsen v. Case Corp.*, 168 F.R.D. 285, 289 (C.D.Cal.1996); see also *Burns v. Imagine Films Entertainment, Inc.*, 164 F.R.D. 589, 592-93 (W.D.N.Y.1996) (general objections that discovery request was overbroad, vague and unduly burdensome were not sufficiently specific to allow court to ascertain objectionable character of discovery request and were improper); *Chubb Integrated Sys. Ltd. v. National Bank of Washington*, 103 F.R.D. 52, 58 (D.D.C.1984) ("General objections are not useful to the court ruling on a discovery motion. Nor does a general objection fulfill [a party's] burden to explain its objections."). The plaintiffs' third objection to CFC's request is based on the ground that it is overbroad and without reasonable limitation in scope or time frame. Once again, plaintiffs fail to

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DOCUMENT REQUEST NO 1: All documents identified, or relied on, in your answers to Counterclaim Plaintiff's First Set of Interrogatories Directed to Counterclaim Defendant.

OBJECTIONS TO DOCUMENT REQUEST NO. 1: St. Paul objects to this request on the ground that the request is oppressive, burdensome and harassing. St. Paul further objects to this request on the ground that it is vague, ambiguous and unintelligible. St. Paul further objects that the request is overbroad and without reasonable limitation in scope or time frame. St. Paul further objects that the request seeks information that is protected from disclosure by the attorney-client privilege, the attorney work product doctrine and/or the joint interest or joint defense privilege. St. Paul further objects to this request on the ground that the request seeks information and documents equally available to the propounding parties from their own records or from records which are equally available to the propounding parties. St. Paul further objects that this request fails to designate the documents to be produced with reasonable particularity.²

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7 8 The plaintiffs' fourth objection to CFC's request is based on the ground that it seeks information that is unrelated from

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1 **RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1.**

3 Admit that the metadata provided by Plaintiff of the PDF documents filed by

4 Defendants in this action reflects that the documents were last modified in the Eastern

5 Time Zone.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 1.**

7 In addition to the General Objections set forth above, Rokoko objects to the

8 extent that this Request is vague and ambiguous as to which "PDF documents" Plaintiff

9 is referring. Rokoko further objects to the extent that the information sought by this

10 Request is not relevant to the claims of either party. Rokoko further objects to the extent

11 that this Request seeks information protected by attorney-client privilege, work product

12 doctrine, or another applicable privilege.

13 **REQUEST FOR ADMISSION NO. 2.**

14 Admit that attorney Emily Graue affixed the typed signature "/s/ Katherine J.

15 Ellena" to one or more PDF filings in this action.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2.**

17 In addition to the General Objections set forth above, Rokoko further objects to

18 the extent that the information sought by this Request is not relevant to the claims of

19 either party. Rokoko further objects to the extent that this Request seeks information

20 protected by attorney-client privilege, work product doctrine, or another applicable

21 privilege. Rokoko further objects to the extent that this Request is vague and ambiguous

22 as to which "PDF filings" Plaintiff is referring.

23 **REQUEST FOR ADMISSION NO. 3.**

24 Admit that in Defendants' filings concerning jurisdiction, Defendants did not

25 disclose the property located at 44 Tehama Street, San Francisco, California.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 3.**

27 In addition to the General Objections set forth above, Rokoko further objects to

28 this Request to the extent that it seeks information that is not relevant to a claim or

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2 follows: **Admitted** that Jakob Balslev is Rokoko's CEO.

3 **REQUEST FOR ADMISSION NO. 12.**

4 Admit that attorney from Reed Smith LLP assisted in drafting Mikkel Overby's

5 declaration in this action.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12.**

7 In addition to the General Objections set forth above, Rokoko objects to the

8 extent that this Request seeks information protected by the attorney-client privilege,

9 work product doctrine, and other applicable privileges. Rokoko further objects to the

10 extent that this Request seeks information that is not relevant to any claim or defense

11 by any party. Rokoko further objects to the extent that this Request's attempt to pry into

12 the mental impressions or litigation strategy of Rokoko's counsel is inappropriate,

13 irrelevant to the any claims or defenses, unduly burdensome, and harassing. Rokoko

14 further objects that this Request is vague and ambiguous with respect to the undefined

15 term "assisted."

16 **REQUEST FOR ADMISSION NO. 13.**

17 Admit that attorney Emily Graue assisted in drafting Katherine J. Ellena's

18 declaration in this action.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 13.**

20 In addition to the General Objections set forth above, Rokoko objects to the

21 extent that this Request seeks information protected by the attorney-client privilege,

22 work product doctrine, and other applicable privileges. Rokoko further objects to the

23 extent that this Request seeks information that is not relevant to any claim or defense

24 by any party. Rokoko further objects to the extent that this Request's attempt to pry into

25 the mental impressions or litigation strategy of Rokoko's counsel is irrelevant to the any

26 claims or defenses, unduly burdensome, and harassing. Rokoko further objects to the

27 extent that this Request is vague and ambiguous with respect to the undefined term

28 "assisted."

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DECLINED TO RESPOND TO CFC'S REQUESTS FOR ADMISSION AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION