

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

*[Hon. Rozella A. Oliver, Courtroom  
590]*

Hearing Date: February 4, 2025  
Hearing Time: 10:00 AM

**DECLARATION OF MATTHEW R.  
WALSH re: TERMS AND  
CONDITIONS RFA's**

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.

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16 1. **REQUEST FOR ADMISSION NO. 16.** Admit that before March 2025,  
17 your terms of service never granted you the rights to use or resell user  
18 animations.

19 a. **RESPONSE:** “In addition to the General Objections set forth above,  
20 Rokoko objects to the extent that this Request **calls for a legal**  
21 **conclusion.** Rokoko further objects to the extent that this Request  
22 lacks any temporal limitation, and is therefore unlimited as to scope  
23 and time, impermissibly broad, and unduly burdensome. Rokoko  
24 further objects to the extent that this Request is vague and ambiguous  
25 with respect to the terms “terms of service”, “rights”, “use”, and  
26 “resell”, such that Rokoko is unable to formulate a response or  
27 otherwise admit in good faith.

28 2. **REQUEST FOR ADMISSION NO. 17.** Admit that after March 2025, your  
29 terms of service were changed to grant you the right to “anonymize”  
30 animations and resell them to third parties.

31 a. **RESPONSE:** In addition to the General Objections set forth above,  
32 Rokoko objects to the extent that this Request **calls for a legal**  
33 **conclusion.** Rokoko further objects to the extent that this Request is  
34 overbroad as to scope. Rokoko further objects to the extent that this  
35 Request is duplicative of Request for Admission No. 16. Rokoko

36 further objects to the extent that this Request is vague and ambiguous  
37 with respect to the terms “changed”, “anonymize”, and “resell”.

38 3. **REQUEST FOR ADMISSION NO. 21.** Admit that Plaintiff does not have  
39 an active “Teams” subscription and has never purchased one.

40 a. **RESPONSE:** In addition to the General Objections set forth above,  
41 Rokoko objects to the extent that this Request seeks information that is  
42 not relevant to any claim or defense in this action. Rokoko further  
43 objects to the extent that this Request is unduly burdensome and  
44 **harassing**. Rokoko further objects to the extent that this Request seeks  
45 information outside of Rokoko’s knowledge. Subject to and without  
46 waiving any of its objections, Rokoko responds as follows: **Whether**  
47 **Plaintiff has a “Teams” subscription is outside of “Rokoko’s”**  
48 **knowledge** and therefore Rokoko **lacks sufficient information** to admit  
49 or deny.

50 4. **REQUEST FOR ADMISSION NO. 35.** Admit you have modified the terms  
51 of service without notification to customers.

52 a. **RESPONSE:** In addition to the General Objections set forth above,  
53 Rokoko objects to the extent that this Request is vague and ambiguous  
54 with respect to the terms “modified” and “notification”. Rokoko  
55 further objects to the extent that this Request is overbroad as to scope

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*and time. Rokoko further objects to the extent that this Request is*

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*based on speculation rather than fact. Rokoko further objects to*

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*Plaintiff's mischaracterization of the facts.*

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I declare under penalty of perjury under the laws of the United States of America

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that the foregoing is true and correct.

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Executed this 16th day of December, 2025, in Santa Clarita, California.

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Matthew R. Walsh  
Plaintiff In Pro Per