

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 22, 2026
Time: 10:00 AM
Department/Judge: Hon. Oliver,

Defendant

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

State Court Action Filed: May 12, 2025
Removal Date: June 12, 2025
Discovery Cutoff: August 10, 2026
Trial Date: March 9, 2027

8
9 I, Matthew R. Walsh, declare I am the Plaintiff in this matter. I have
10 personal knowledge of the following facts and if called as a witness I could
11 and would testify competently hereto. All text, images and exhibits herein

12 are true and accurate copies which I have received or have made and I am
13 authenticating all of them under the penalty of perjury.

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

- 20 • **Exhibit 2** is Plaintiff's provided discovery production to the Defendants.
- 21 • **Exhibit 3** is an e-mail from Feb 23, 2026 in which Plaintiff continues to
22 notify the Defendants they have not issued a privilege log, nor a statement of
23 withholding.
- 24 • **Exhibit 4** is the only document production by the Defendants, non-
25 compliant with the request.
- 26 • **Exhibit 5** - The Defendant destroyed the metadata from the draft
27 agreements, despite a Court order that they produce them in native format
28 with the metadata intact.
- 29 • **Exhibit 6** – Jakob Balslev's own self-signed document effective July 10,
30 2024 – July 10, 2025 clearly states he is the CEO, CFO and Secretary. It was

31 denied by the Defendants as the Motion to Strike Removal was pending and
32 could affect the nerve-center argument.

- 33 • **Exhibit 7** – Defendants said DENIED that the MTD was filed within hours
34 of the 7-3 conference. The record and their own statements prove otherwise.

35
36 I declare under penalty of perjury under the laws of the United States of America
37 that the foregoing is true and correct.

38
39 Executed this March 26, 2026, in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff In Pro Per

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EXHIBIT 1

48 Defendant's precise wording is continually referenced in Federal Cases as
49 unacceptable.

nextwestlaw.com/Document/1b2064db653d4119b17ee4cd604a702/View/FullText.html?navigationPath=Search%2Fv1%2Fresults%2Fnavigation...

THOMSON REUTERS WESTLAW 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

Return to 4 of 20 results Hide Highlights

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

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

- 4 -

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THOMSON REUTERS WESTLAW 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

Return to 4 of 20 results Hide Highlights

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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 offer any evidence or affidavits in support of these objections. See *Elienne v. Wolverine Tube, Inc.*, 185 F.R.D. 653, 656 (D.Kan.1999) (stating that a party resisting discovery on the grounds that a request is overly broad, including any objection to the temporal scope of the request, has the burden to support its objection, unless the request is overly broad on its face); accord *Hill v. SFC, Inc.*, 170 F.R.D. 182, 186 (D.Kan.1997).

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

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."

- 8 -

DECLINED TO RESPOND TO CFC'S REQUESTS FOR ADMISSION NO. 12 AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION

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EXHIBIT 2

56 Plaintiff's discovery production as provided to the Defendants.

-  ATTACHMENTS
-  EXIF
-  HTML
-  METADATA
-  NATIVES
-  ORIGINALS
-  PDF
-  TEXT
-  TIFF
-  _Privelage Log.csv
-  _concordance_lexis_load_file.dat
-  _coverLetterLatest.txt
-  _fileList.txt
-  _fileMap.xml
-  _OPT_load_file.opt
-  _relativity_load_file.lfp
-  index.csv
-  indexRespons__2019.csv
-  indexRespons__2020.csv
-  indexRespons__2021.csv
-  indexRespons__2022.csv
-  indexRespons__2023.csv
-  indexRespons__2024.csv
-  indexRespons__2025.csv
-  indexRespons__Alexis; Mincolla; Wasserman; Celebrities; Celebrity; Grendel; 3teeth; Aries; 8mm; Saturne; derr.csv
-  indexRespons__confidential.csv
-  indexRespons__contract; agreement; terms.csv
-  indexRespons__Discount.csv
-  indexRespons__failure.csv
-  indexRespons__firmware.csv
-  indexRespons__hollywood; live event.csv
-  indexRespons__intellectual property; misappropriation; sublicense; anonymize.csv
-  indexRespons__investor; fraud; misrepresentation.csv
-  indexRespons__legal; lawsuit.csv
-  indexRespons__Momentum.csv
-  indexRespons__Nintendo; Sony; Google.csv
-  indexRespons__parts; repair; song-beverly; refund; replacement.csv
-  indexRespons__sensor; wires; hub; gloves; 180mm.csv
-  indexRespons__soundtrack; music.csv
-  indexRespons__testifying expert; expert witness; forensic investigat; radke.csv
-  indexRespons__The Next World; New Terra; THE NOTHING; nothingcanstopyounow; thenextworldvideogame.csv
-  indexRespons__Third-party contracts.csv
-  indexRespons__videos; trailer; mp4; avi; mkv; mpg; mpeg.csv
-  indexRespons__voice acting; vox.csv
-  indexRespons__Your order; RKK#; YOYO SPIN; A shipment; on the way.csv

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59 Plaintiff provided a privilege log:

A	B	C	D	E	F	G	H	
1	Start Dates	End Dates	RFP No.	Privileged?	Confidential?	Custodian	Description	Privilege or Confidentiality asserted
2			25	YES	YES	Plaintiff	Nintendo Licensing Agreement(s)	Confidential Commercial Information, NDA, Confidential License Agreements, Trade Secret Protection
3			26	YES	YES	Plaintiff	Nintendo Communications	Stored Communications Act, Confidential Commercial Information, NDA, Confidential License Agreements
4			27	YES	YES	Plaintiff	Sony Licensing Agreement(s)	Confidential Commercial Information, NDA, Confidential License Agreements, Trade Secret Protection
5			28	YES	YES	Plaintiff	Sony Communications	Stored Communications Act, Confidential Commercial Information, NDA, Confidential License Agreements
6			45	YES	YES	Plaintiff	Communications with private investigators	Work product

60 Plaintiff's detailed indexes:

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	
1	Start Dates	End Dates	RFP No.	Privileged?	Confidential?	Custodian	Description	Date	From	To	CC	BCC	Subject	Text File	PDF File	HTML File	Native File	Metadata	DXF	Attachment	Keyword	SHA256			
2	1					WALSH	Mocap 85/ 850 Animations/Mocap 850 animations files 2.png	#####						Mocap 850 animatio	PDF\WALSH000001.p	NATIVES\WALSH000001.png									
3	4					WALSH	Mocap 85/ 850 Animations/Mocap 850 animations files.png	#####						Mocap 850 animatio	PDF\WALSH000002.p	NATIVES\WALSH000002.png									
4	5					WALSH	AI - web 2. AI training\AI - web 2.png	#####						AI - web 2	PDF\WALSH000003.p	NATIVES\WALSH000003.png									
5	6					WALSH	AI - web.p AI training\AI - web.png	#####						AI - web	PDF\WALSH000004.p	NATIVES\WALSH000004.png									
6	7					WALSH	AI infringe AI training\AI infringing.png	#####						AI infringing	PDF\WALSH000005.p	NATIVES\WALSH000005.png									
7	8					WALSH	AI training AI training\AI training 1.png	#####						AI training 1	PDF\WALSH000006.p	NATIVES\WALSH000006.png									
8	9					WALSH	AI training AI training\AI training 2.png	#####						AI training 2	PDF\WALSH000007.p	NATIVES\WALSH000007.png									
9	10					WALSH	AI training AI training\AI training 3.png	#####						AI training 3	PDF\WALSH000008.p	NATIVES\WALSH000008.png									
10	11					WALSH	(Correctio IAI Rokoko Emails)(Correction) We're going live in 8 hours.me5/16/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						Correctio	TEXT\WAL	PDF\WALSH000009.m	NATIVES\WALSH000009.m								
11	12					WALSH	(Invitation IAI Rokoko Emails)(Invitation) Live Rokoko event this week 6/11/2022 hi@rokoko:Matthew Walsh <matthew@wv	#####						Invitation	TEXT\WAL	PDF\WALSH000011.m	NATIVES\WALSH000011.m								
12	13					WALSH	(Invite on IAI Rokoko Emails)(Invite only) Conquer character animation 10/14/2022 hi@rokoko:WINTERYEAR Studios Los Ang	#####						Invite on IAI	TEXT\WAL	PDF\WALSH000013.m	NATIVES\WALSH000013.m								
13	14					WALSH	(Invite on IAI Rokoko Emails)(Invite only) Live workshop with Rokoko Vi 2/7/2023 hi@rokoko:WINTERYEAR Studios Los Ang	#####						Invite on IAI	TEXT\WAL	PDF\WALSH000017.m	NATIVES\WALSH000017.m								
14	15					WALSH	(Product IAI Rokoko Emails)(Product Launch) Introducing the Heading 7/25/2023 hi@rokoko:Matthew Walsh <matthew@wv	#####						Product I	TEXT\WAL	PDF\WALSH000020.m	NATIVES\WALSH000020.m								
15	16					WALSH	(Studio Be IAI Rokoko Emails)(Studio Beta Update) We're removing all a:5/5/2022 9 hi@rokoko:Matthew Walsh <matthew@wv	#####						Studio Be	TEXT\WAL	PDF\WALSH000024.m	NATIVES\WALSH000024.m								
16	17					WALSH	(Webinar IAI Rokoko Emails)(Webinar Invitation) Master mocap work! 4/9/2024 8 hi@rokoko:Matthew Walsh <matthew@wv	#####						Webinar	TEXT\WAL	PDF\WALSH000027.m	NATIVES\WALSH000027.m								
17	18					WALSH	(Webinar IAI Rokoko Emails)(Webinar Invite) How to dominate animati 10/14/2022 hi@rokoko:WINTERYEAR Studios Los Ang	#####						Webinar	TEXT\WAL	PDF\WALSH000029.m	NATIVES\WALSH000029.m								
18	19					WALSH	(Webinar IAI Rokoko Emails)(Webinar this Thursday) Mastering pro mc 13/1/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						Webinar	TEXT\WAL	PDF\WALSH000031.m	NATIVES\WALSH000031.m								
19	20					WALSH	(Your Invt IAI Rokoko Emails)(Your Invitation) Future of Real-Time Mocap 2/12/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						Your Invt	TEXT\WAL	PDF\WALSH000034.m	NATIVES\WALSH000034.m								
20	21					WALSH	\$1,915 for IAI Rokoko Emails \$1,915 for you + the webinar recording 2/23/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						\$1,915 fo	TEXT\WAL	PDF\WALSH000036.m	NATIVES\WALSH000036.m								
21	22					WALSH	2 weeks le IAI Rokoko Emails 2 weeks left for Indie Creator Bundle disco 9/18/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						2 weeks le	TEXT\WAL	PDF\WALSH000039.m	NATIVES\WALSH000039.m								
22	23					WALSH	3 example IAI Rokoko Emails 3 examples of the power of Unreal paired 1/16/2023 hi@rokoko:Matthew Walsh <matthew@wv	#####						3 example	TEXT\WAL	PDF\WALSH000041.m	NATIVES\WALSH000041.m								
23	24					WALSH	30 minute IAI Rokoko Emails 30 minutes till we go live! a few spots 4/15/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						30 minute	TEXT\WAL	PDF\WALSH000045.m	NATIVES\WALSH000045.m								
24	25					WALSH	30 minute IAI Rokoko Emails 30 minutes till we go live! equip stud 5/8/2024 1 hi@rokoko:Matthew Walsh <matthew@wv	#####						30 minute	TEXT\WAL	PDF\WALSH000047.m	NATIVES\WALSH000047.m								
25	26					WALSH	30 mins t IAI Rokoko Emails 30-mins till we're live Winbush showc 6/12/2024 hi@rokoko:Matthew Walsh <matthew@wv	#####						30 mins t	TEXT\WAL	PDF\WALSH000049.m	NATIVES\WALSH000049.m								

63 Plaintiff's Concordance load file:



65 Plaintiff's OPT load file:

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WALSH000002,WALSH,,TIFF\TIFF\WALSH000002.tiff,1
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WALSH000047,WALSH,,TIFF\TIFF\WALSH000047.tiff,2
Ln 10, Col 48 100% Windows (CRLF) UTF-8

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67 Plaintiff's Relativity load file:

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IM,IMAGEID,VOLUME,IMAGEPATH,FLAGS,,,PAGECOUNT
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IM,WALSH000002,WALSH,TIFF\TIFF\WALSH000002.tiff,Y,,,1
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IM,WALSH000004,WALSH,TIFF\TIFF\WALSH000004.tiff,Y,,,1
IM,WALSH000005,WALSH,TIFF\TIFF\WALSH000005.tiff,Y,,,1
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IM,WALSH000024,WALSH,TIFF\TIFF\WALSH000024.tiff,Y,,,3
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IM,WALSH000029,WALSH,TIFF\TIFF\WALSH000029.tiff,Y,,,2
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IM,WALSH000034,WALSH,TIFF\TIFF\WALSH000034.tiff,Y,,,2
IM,WALSH000036,WALSH,TIFF\TIFF\WALSH000036.tiff,Y,,,3
IM,WALSH000039,WALSH,TIFF\TIFF\WALSH000039.tiff,Y,,,2
IM,WALSH000041,WALSH,TIFF\TIFF\WALSH000041.tiff,Y,,,4
IM,WALSH000045,WALSH,TIFF\TIFF\WALSH000045.tiff,Y,,,2
IM,WALSH000047,WALSH,TIFF\TIFF\WALSH000047.tiff,Y,,,2
Ln 10, Col 54 100% Windows (CRLF) UTF-8

```

68

69 Plaintiff's custom created load file:

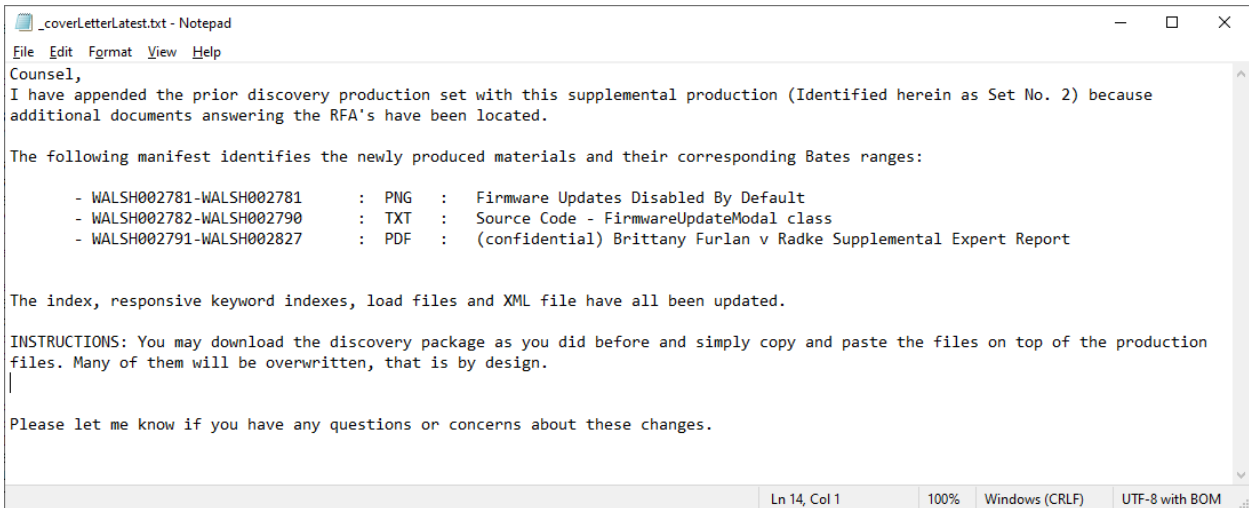
```

▼<WALSH002791>
  <originalFilename>(confidential) Brittany Furlan v Radke Supplemental Expert Report.pdf</originalFilename>
  <originalPathname>\Testifying Expert\confidential) Brittany Furlan v Radke Supplemental Expert Report.pdf</originalPathname>
  <fileType>pdf</fileType>
  <sha256>b1948757c5c37fcd9dfed8e96a871565d348d1dd90c5bfd8ea239e1f74d62021</sha256>
  <textFile>TEXT\WALSH002791.txt</textFile>
  <pdfFile>PDF\WALSH002791.pdf</pdfFile>
  <htmlFile/>
  <nativeFile>NATIVES\WALSH002791.pdf</nativeFile>
  <metaFile/>
  <exifFile/>
  ▼<responsiveKeywords>
    <keyword>Alexis; Mincolla; Wasserman; Celebrities; Celebrity; Grendel; 3teeth; Aries; 8mm; Saturne; derr</keyword>
    <keyword>videos; trailer; mp4; avi; mkv; mpg; mpeg</keyword>
    <keyword>soundtrack; music</keyword>
    <keyword>contract; agreement; terms</keyword>
    <keyword>testifying expert; expert witness; forensic investigat; radke</keyword>
    <keyword>2025</keyword>
    <keyword>2023</keyword>
  </responsiveKeywords>
  ▼<batesRange>
    <range>WALSH002791-WALSH002827</range>
    <start>WALSH002791</start>
    <end>WALSH002827</end>
    <startNum>2791</startNum>
    <endNum>2827</endNum>
    <pageCount>37</pageCount>
  </batesRange>
  ▼<productionSetAppendInformation>
    <date>2026-03-10</date>
    <appendReason>additional documents answering the RFA's have been located</appendReason>
    <productionSetNo>2</productionSetNo>
  </productionSetAppendInformation>
  </WALSH002791>
</walshFileMapFormat>

```

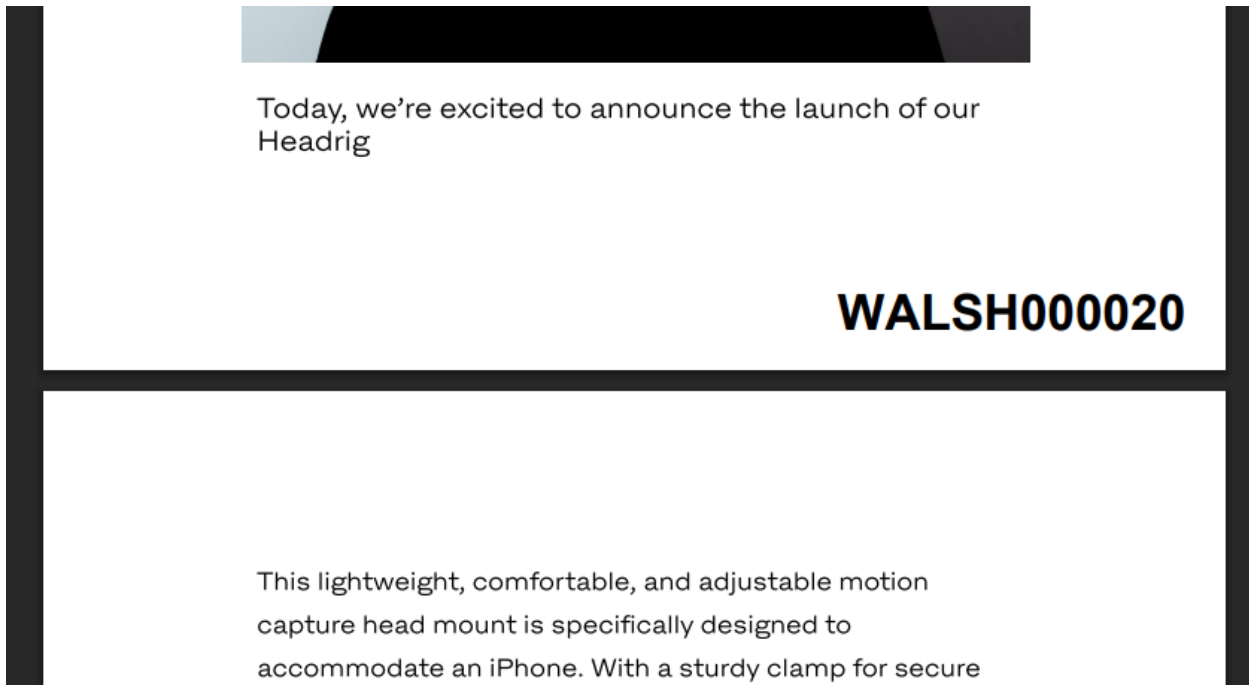
70

71 Plaintiff's automated cover letter including for delta updates:



72

73 Plaintiff's high resolution bates stamped TIFF files and PDF's:



74 This lightweight, comfortable, and adjustable motion capture head mount is specifically designed to accommodate an iPhone. With a sturdy clamp for secure

75 Plaintiff provided even EXIF metadata extractions for all files:

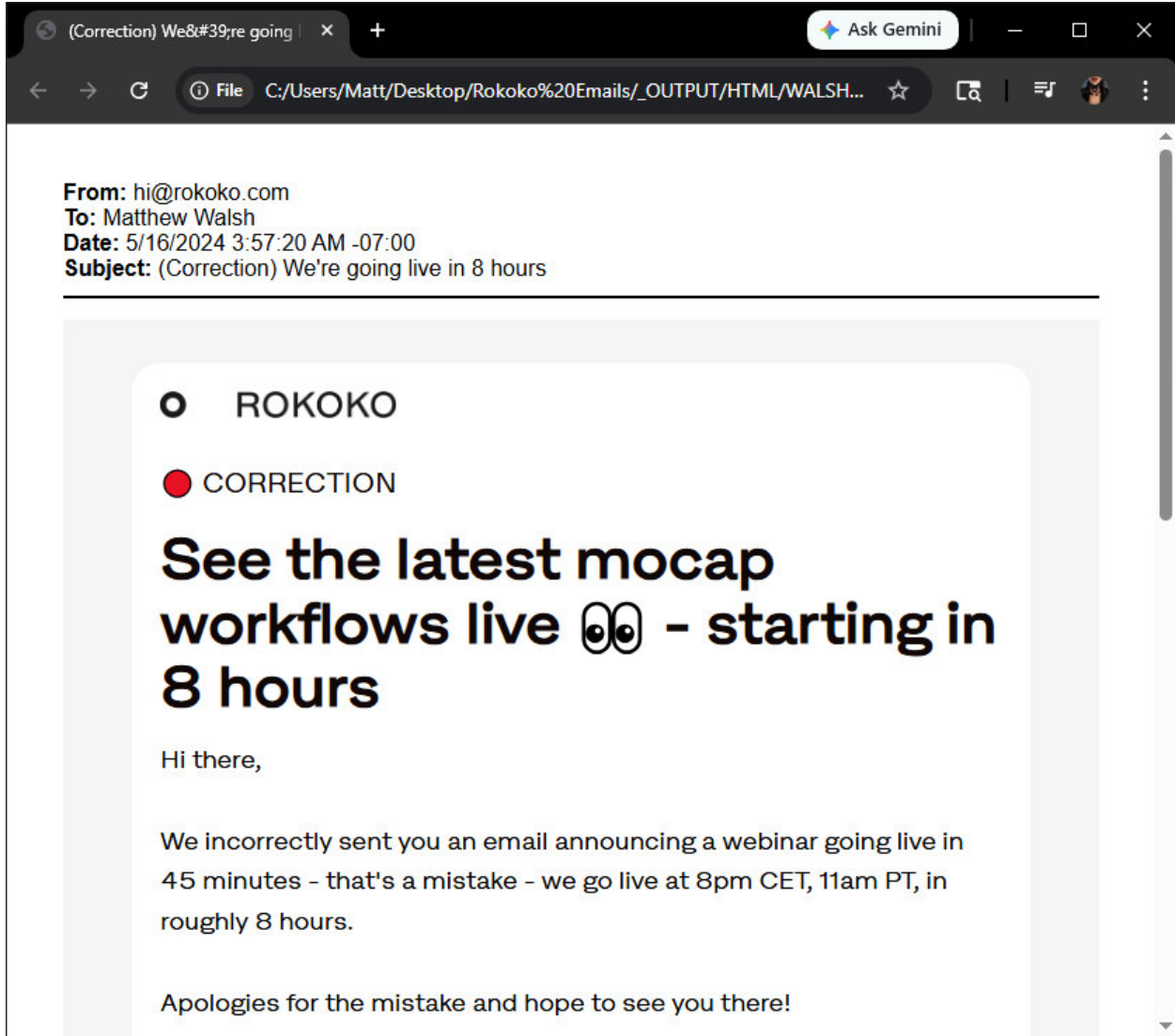
```

WALSH000099-att1.txt - Notepad
File Edit Format View Help
|---- ExifTool ----
ExifTool Version Number      : 13.31
---- System ----
File Name                    : WALSH000099-1---Walsh v Rokoko Civil.pdf
Directory                   : C:/Users/Matt/Desktop/Rokoko Emails/_OUTPUT/ATTACHMENTS
File Size                    : 1986 kB
File Modification Date/Time  : 2026:03:06 10:57:06-08:00
File Access Date/Time       : 2026:03:06 10:57:06-08:00
File Creation Date/Time     : 2026:03:06 10:57:06-08:00
File Permissions            : -rw-rw-rw-
---- File ----
File Type                    : PDF
File Type Extension         : pdf
MIME Type                   : application/pdf
---- PDF ----
PDF Version                  : 1.7
Linearized                  : Yes
Author                      : Matt
Create Date                 : 2025:05:04 21:35:44-07:00
Creator                     : Microsoft® Word for Microsoft 365
Modify Date                 : 2025:05:04 21:38:09-07:00
Producer                    : Microsoft® Word for Microsoft 365
Title                       : COMPLAINT FOR DAMAGES..(Fraud, Intellectual Property Theft, Breach of Warranty, and Related Claims)
Language                    : en
Tagged PDF                  : Yes
Page Count                  : 65
---- XMP-x ----
XMP Toolkit                  : Adobe XMP Core 9.1-c001 79.675d0f7, 2023/06/11-19:21:16
---- XMP-pdf ----
Producer                    : Microsoft® Word for Microsoft 365
---- XMP-dc ----
Format                      : application/pdf
Title                       : COMPLAINT FOR DAMAGES..(Fraud, Intellectual Property Theft, Breach of Warranty, and Related Claims)
Creator                     : Matt
---- XMP-xmp ----
Ln 1, Col 1      100%  Windows (CRLF)  UTF-8

```

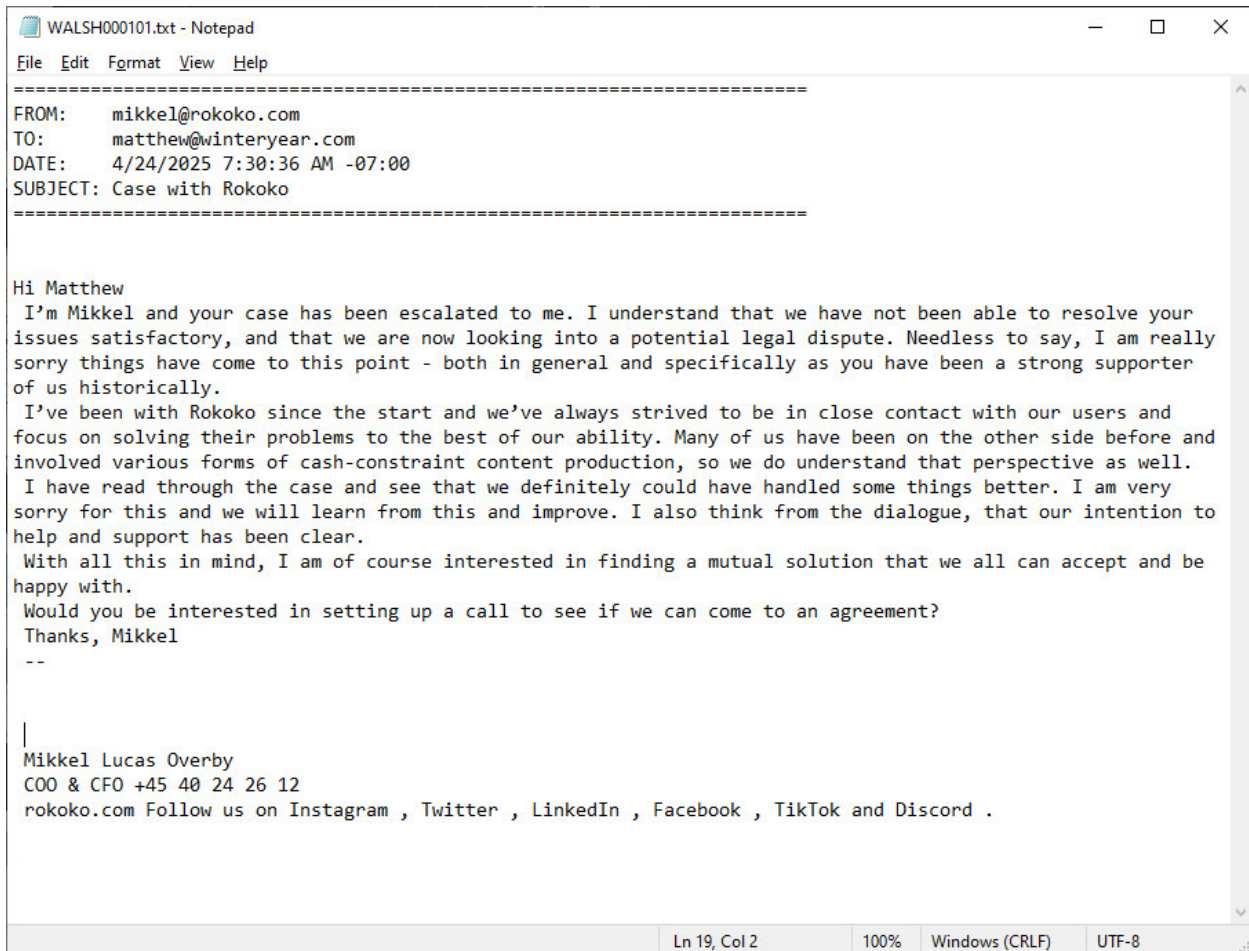
76

77 Plaintiff converted all e-mails also to HTML for web-browser viewing (and also to
78 see any hidden code in the e-mails)



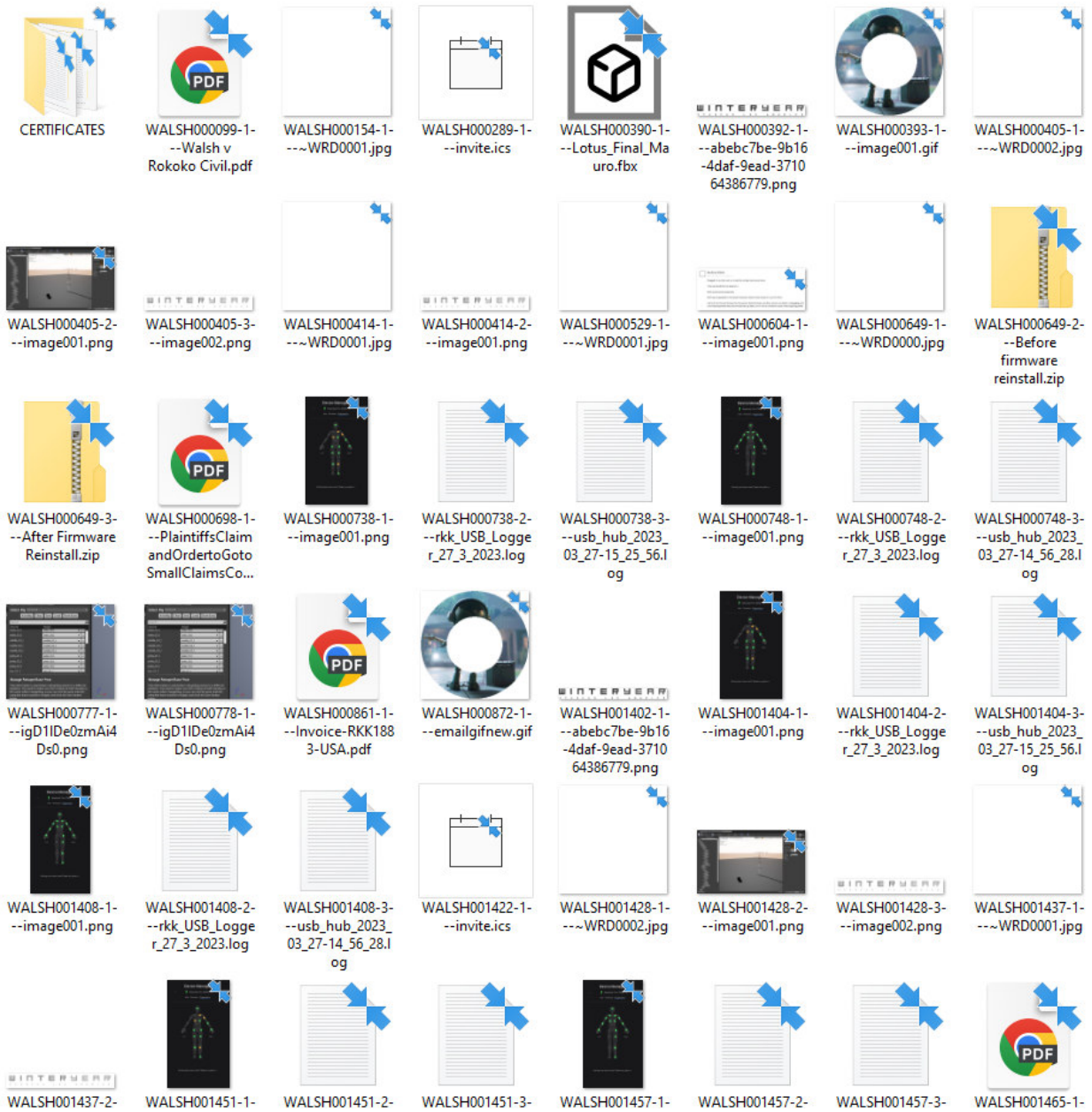
79

80 Plaintiff converted all e-mails and documents also to scannable text:



81

82 Plaintiff extracted all attachments from the e-mails:



83

84

85

86 Plaintiff provided SHA256 certificates for *all files*; as Defendant was concerned
87 with tampering:



88

89

90 Plaintiff provided extracted e-mail header metadata for all messages:



91

92 All from a system he custom built to comply with the FRCP, the Court and the
93 Defendants' needs while taking into account cost-saving measures for them:



94 Processing file: C:\Users\Matt\Desktop\Rokoko Emails_INPUT\AI training\AI - web 2.png (png)

95

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EXHIBIT 3

104


105 An e-mail from Feb 23, 2026 in which Plaintiff continues to notify the Defendants
106 they have not issued a privilege log, nor a statement of withholding.

RE: Rule 37 / RFP's

 matthew@winteryear.com
To: 'Ellena, Katherine J.'; 'Gorospe, Valentino'; 'Graue, Emily H.'
Cc: 'Galibois, Michael B.'

 Reply  Reply All  Forward 

Mon 2/23/2026 6:35 PM

 You replied to this message on 2/23/2026 6:37 PM.

have anything to do with ReedSmith and were created prior to your retention.
v. Not confidential as there is a protective order in place

7.
d. Please confirm for each request:

- i. Whether responsive documents exist;
- ii. Whether they are being withheld;
- iii. The custodians searched;
- iv. The applicable time limitation applied.
- v. III. Production Timeline

PROTECTIVE ORDER

1. For RFP No. 1, Defendant indicated documents would be produced following entry of a Protective Order. The Protective Order has now been entered.
2. Please provide a date certain for production of responsive documents for RFP No. 1 and identify whether rolling production will begin for any other RFPs.

PRIVILEGE LOG

1. No privilege log has been received as of today, if you are claiming privilege, you must submit a privilege log.

CONCLUSION

Now that you have the list, please respond to the above within 7 days. Separately, I would like to meet and confer as I intend to move the Court to compel the production and responses of these and others under Rule 34(b)(2)(C) and ask the Court to impose a production schedule. If responses are once again evasive, I will seek other remedies.

Thanks
Matthew R. Walsh

107
108 No statement of withholding:

RE: Rule 37 / RFP's



matthew@winteryear.com

To: 'Ellena, Katherine J.'; 'Gorospe, Valentino'; 'Graue, Emily H.'
Cc: 'Galibois, Michael B.'

Reply Reply All Forward

Mon 2/23/2026 6:35 PM

You replied to this message on 2/23/2026 6:37 PM.

OVERALL ISSUES

1. Failure to State Whether Documents Are Being Withheld (Rule 34(b)(2)(C))
2. For Requests for Production Nos. 2–21, Defendant asserts numerous objections but does not state whether responsive documents are being withheld on the basis of those objections.
3. Rule 34(b)(2)(C) requires a responding party to state whether any responsive materials are being withheld.

Please clarify, for each RFP, whether responsive documents exist and are being withheld pursuant to the asserted objections.

BOILERPLATE OBJECTIONS

1. Defendant repeatedly asserts objections such as:
 1.
 - a. "Overbroad"
 - b. "Vague and ambiguous"
 - c. "Not reasonably calculated to lead to admissible evidence"
 - d. "Unduly burdensome"
 - e. "Harassing"

109

110

111

Defendant outright refused to provide a statement of withholding or privilege log, regardless of how many times it was asked:

RE: Rule 37 / RFP's



matthew@winteryear.com

To: 'Ellena, Katherine J.'; 'Gorospe, Valentino'; 'Graue, Emily H.'
Cc: 'Galibois, Michael B.'

Reply Reply All Forward

Mon 2/23/2026 6:45 PM

You replied to this message on 2/27/2026 3:04 PM.

And again, I am stating Rule 34(b)(2)(C) requires I receive written responses as to document withholding with your objections. I did not receive those, so I am asking for them.

Are you refusing to provide those responses?

From: Ellena, Katherine J. <KEllena@reedsmith.com>

Sent: Monday, February 23, 2026 6:42 PM

To: matthew@winteryear.com; Gorospe, Valentino <VGorospe@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>

Cc: Galibois, Michael B. <MGalibois@reedsmith.com>

Subject: RE: Rule 37 / RFP's

Matt –

Again, we are available to discuss Rokoko's written objections to your RFPs and Interrogatories if you wish. We are also willing to explore where the parties can narrow and/or compromise on some of the requests. If you would like to discuss, please let us know your availability.

Katherine J. Ellena | Partner

kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:

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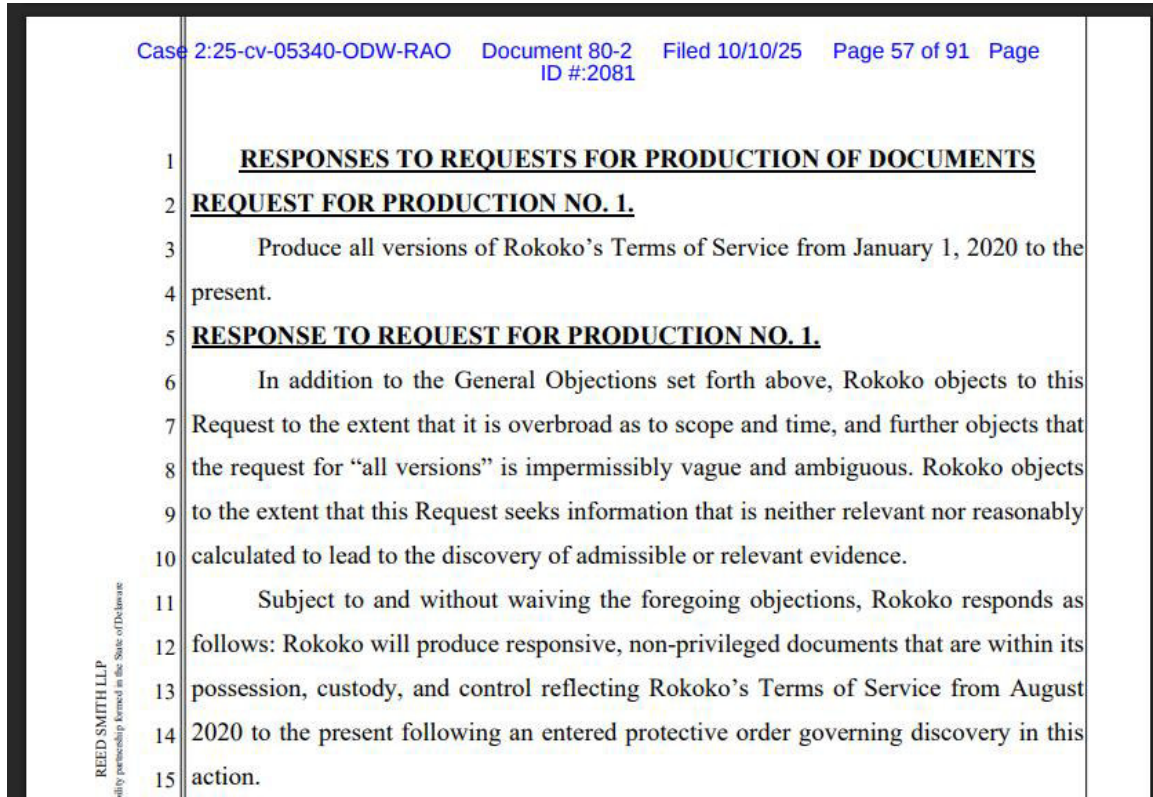
117

118

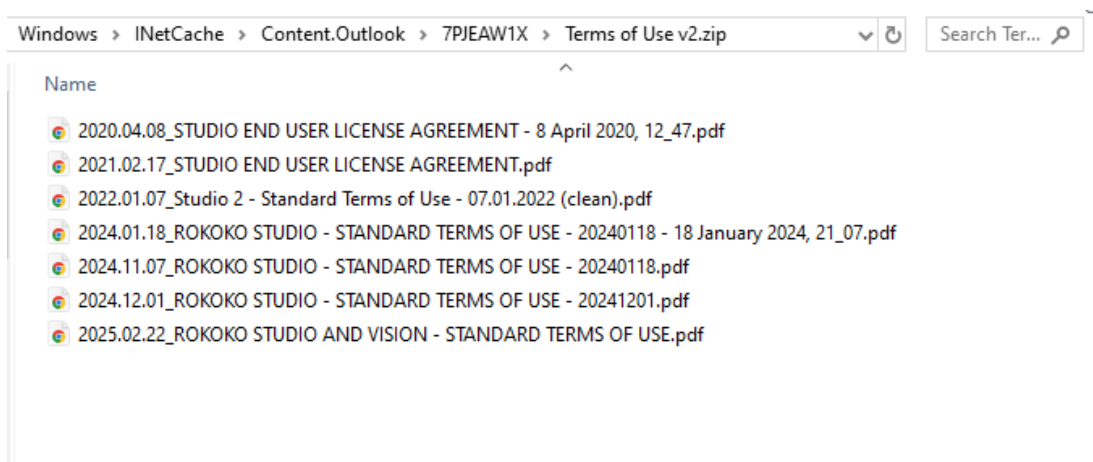
119

EXHIBIT 4

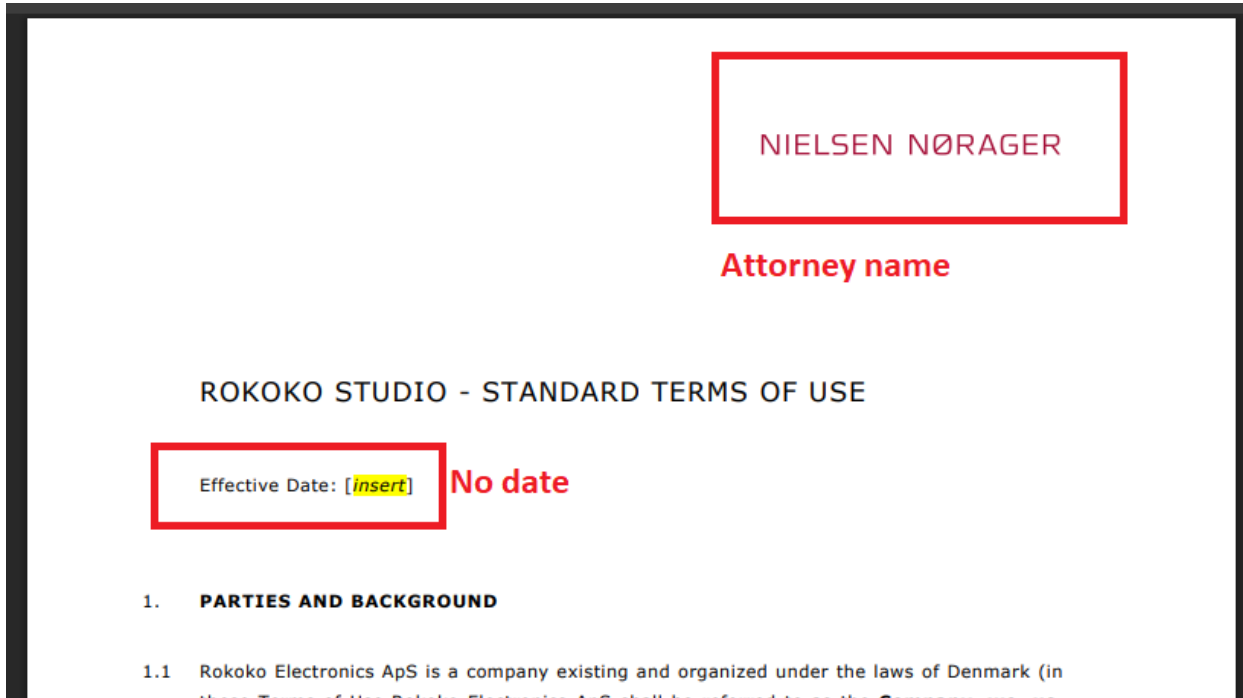
120 Defendant’s only document production is not what was asked.



121
122 The Defendant instead delivered only unused, unpublished, non-operative attorney
123 drafts rather than even one of the three operative agreements. All of these are
124 drafts:



126

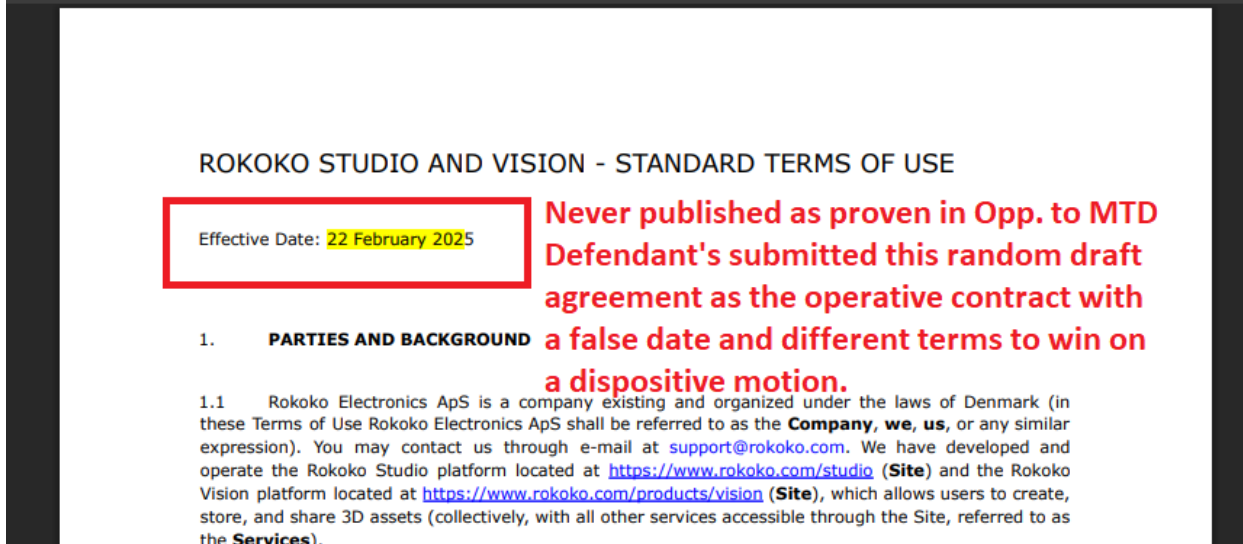
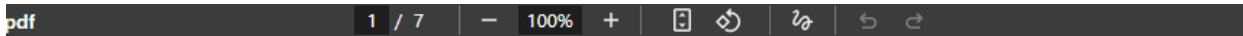


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The same exact document Defendants told the Court was operative is not only an unpublished attorney draft, it came a year after Plaintiff was even a user.



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EXHIBIT 5

136 The Defendant destroyed the metadata from the draft agreements, despite a Court
137 order that they produce them in native format with the metadata intact.

138

139 **The 'Production Letter' from ReedSmith is the sample for comparison:**

```

C:\> Command Prompt - "exiftool(-k).exe" -a -u -g1 -ee -api RequestAll=3 "Walsh - 2026-003-03 PROD1 Production Letter.pdf"
-g1 -ee -api RequestAll=3 "Walsh - 2026-003-03 PROD1 Production Letter.pdf"
---- ExifTool ----
ExifTool Version Number      : 13.53
Now                          : 2026:03:26 12:21:14-07:00
New GUID                     : 20260326-1221-1400-CC04-B12E919B6B15
File Sequence                : 0
Processing Time               : 0.0627 s
---- System ----
File Name                    : Walsh - 2026-003-03 PROD1 Production Letter.pdf
Base Name                    : Walsh - 2026-003-03 PROD1 Production Letter
Directory                    : .
File Path                    : C:/Users/Matt/Desktop/Rokoko Case Files/Discovery Responses/Terms o
f Use v2/Walsh - 2026-003-03 PROD1 Production Letter.pdf
File Size                    : 206 kb
Zone Identifier              : Exists
File Modification Date/Time   : 2026:03:26 12:20:59-07:00
File Access Date/Time        : 2026:03:26 12:20:59-07:00
File Creation Date/Time      : 2026:03:26 12:20:59-07:00
File Permissions             : -rw-rw-rw-
File Attributes              : Regular; (none); Archive, Compressed
File Device Number           : 0
File Inode Number            : 0
File Hard Links              : 1
File User ID                 : 0
File Group ID                : 0
File Device ID               : 0.0
File Block Size              :
File Block Count             :
---- File ----
File Type                    : PDF
File Type Extension          : pdf
MIME Type                    : application/pdf
File Type                    : (unsupported)
File Type                    : (unsupported)
---- PDF ----
PDF Version                  : 1.6
Linearized                   : Yes
Create Date                  : 2026:03:03 16:18:04-08:00
Modify Date                  : 2026:03:03 19:30:29-05:00
Creator                      : Aspose Ltd.
Producer                     : Aspose.PDF for .NET 22.6.0
Page Count                   : 1
Embedded Image Color Space   : DeviceRGB
Embedded Image Filter        : FlateDecode
Embedded Image Height        : 165
Embedded Image Width         : 423
Embedded Image Color Space   : Indexed, DeviceRGB, 255
Embedded Image Filter        : FlateDecode
Embedded Image Height        : 187
Embedded Image Width         : 615
Has XFA                      : No
---- XMP-dc ----
Format                       : application/pdf
---- XMP-xmp ----
Modify Date                  : 2026:03:03 16:18:04-08:00
Create Date                  : 2026:03:03 16:18:04-08:00
---- XMP-xmpMM ----
Document ID                  : uuid:7a2e83f7-0ad2-4664-8429-a3e09dba673a
Instance ID                  : uuid:54aafe11-d3f7-4db7-838c-157413797ddf
-- press ENTER --

```

Pacific Timezone/Los Angeles

ReedSmith uses Aspose for all of their PDF work.

140

141 The 2020 draft agreement shows it was edited over 23 minutes by ReedSmith in
142 March, 2026. All of the PDF's show Aspose.PDF editing.

```

Command Prompt - "exiftool(-k).exe" -a -u -g1 -ee -api RequestAll=3 "2020.04.08_STUDIO END USER LICENSE AGREEMENT...
-- press ENTER --
C:\Users\Matt\Desktop\Rokoko Case Files\Discovery Responses\Terms of Use v2>"exiftool(-k).exe" -a -u
-g1 -ee -api RequestAll=3 "2020.04.08_STUDIO END USER LICENSE AGREEMENT - 8 April 2020, 12_47.pdf"
---- ExifTool ----
ExifTool Version Number      : 13.53
Now                          : 2026:03:26 12:23:50-07:00
New GUID                     : 20260326-1223-5000-C7E8-17085AACB708
File Sequence                : 0
Processing Time              : 0.0336 s
---- System ----
File Name                    : 2020.04.08_STUDIO END USER LICENSE AGREEMENT - 8 April 2020, 12_47.
pdf
Base Name                   : 2020.04.08_STUDIO END USER LICENSE AGREEMENT - 8 April 2020, 12_47
Directory                   : .
File Path                   : C:/Users/Matt/Desktop/Rokoko Case Files/Discovery Responses/Terms o
f Use v2/2020.04.08_STUDIO END USER LICENSE AGREEMENT - 8 April 2020, 12_47.pdf
File Size                   : 647 kB
Zone Identifier              : Exists
File Modification Date/Time  : 2026:03:26 12:13:30-07:00
File Access Date/Time       : 2026:03:26 12:10:57-07:00
File Creation Date/Time     : 2026:03:03 18:07:16-08:00
File Permissions             : -rw-rw-rw-
File Attributes              : Regular; (none); Archive, Compressed
File Device Number          : 0
File Inode Number           : 0
File Hard Links              : 1
File User ID                : 0
File Group ID               : 0
File Device ID              : 0.0
File Block Size             :
File Block Count            :
---- File ----
File Type                   : PDF
File Type Extension         : pdf
MIME Type                   : application/pdf
---- PDF ----
PDF Version                 : 1.4
Linearized                  : No
Has XFA                     : No
Language                    : en_GB
Tagged PDF                  : Yes
Page Count                  : 6
Create Date                 : 2026:03:03 19:07:15-05:00
Modify Date                 : 2026:03:03 19:30:29-05:00
Creator                     : Aspose Ltd.
Producer                    : Aspose.PDF for .NET 22.6.0
---- XMP-uc ----
Format                      : application/pdf
---- XMP-xmp ----
Modify Date                 : 2026:03:03 19:07:15-05:00
Create Date                 : 2026:03:03 19:07:15-05:00
Metadata Date               : 2026:03:03 19:07:15-05:00
---- XMP-xmpMM ----
Document ID                 : uuid:c800f8d8-9f2f-4ccf-9f6c-746ab7365c2e
Instance ID                 : uuid:40170fe3-6075-414f-9500-ec9cf7c7d387
-- press ENTER --

```

2020 agreement...
created March 3/2026?

Edited over 23 minutes by
Emily Graue in
Central/Chicago -05:00

ReedSmith's PDF editing
tool

143

144 Plaintiff then demanded the natives:

RE: Walsh v. Rokoko Electronics



matthew@winteryear.com

To: 'Valencia, Heather R.'

Cc: 'Ellena, Katherine J.'; 'Gorospe, Valentino'; 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Thu 3/26/2026 12:18 PM

Counsel,

As the Court ordered, you must produce the native files where I request them.

These files are not native, they were modified for some reason by you as the metadata shows; destroying the original metadata.

Provide me with the native files within 3 days.

Thank you

Matthew R. Walsh

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EXHIBIT 6

151 Jakob Balslev’s own self-signed document effective July 10, 2024 – July 10, 2025
152 clearly states he is the CEO, CFO and Secretary. It was denied by the Defendants
153 as the Motion to Strike Removal was pending and could affect the nerve-center
154 argument.

STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION CORPORATION
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only
-FILED-
File No.: BA20241277973
Date Filed: 7/10/2024

B2878-8695 07/10/2024 2:47 PM Received by California Secretary of State

Entity Details			
Corporation Name	ROKOKO ELECTRONICS, INCORPORATED		
Entity No.	3890148		
Formed In	DELAWARE		
Street Address of Principal Office of Corporation Principal Address	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Mailing Address of Corporation Mailing Address	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Attention			
Street Address of California Office of Corporation Street Address of California Office	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Officers			
Officer Name	Officer Address	Position(s)	
JAKOB BALSLEV	Denmark MOERDRUPVEJ 15 A 1 4 ESPERGAERDE, 3060	Chief Executive Officer, Secretary, Chief Financial Officer	
Additional Officers			
Officer Name	Officer Address	Position	Stated Position
None Entered			

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EXHIBIT 7

162 Defendants said DENIED that the MTD was filed within hours of the 7-3
163 conference. The record and their own statements prove otherwise.

DECLARATION OF KATHERINE ELLENA

I, Katherine Ellena, declare:

1. I am an attorney with Reed Smith LLP and counsel for Defendant Rokoko Electronics (“Rokoko”). I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration in support of Rokoko’s Motion to Dismiss Plaintiff’s Complaint (the “Motion”).

3. On June 13, 2025, Plaintiff informed my colleague, Emily Graue, on the telephone that he “is going to oppose pretty much everything” filed by Rokoko.

4. In light of Plaintiff’s statement on June 19, 2025, I sent an email to Plaintiff setting forth the bases for Rokoko’s Motion so as to have a thorough, written record of Rokoko’s meet and confer efforts. In response, Plaintiff stated “Best of luck arguing that in front of a judge.” Attached hereto as **Exhibit A** is a true and correct copy of my email communication and Plaintiff’s response.

5. On June 25, 2025, I exchanged further emails with Plaintiff regarding the Motion. Attached hereto as **Exhibit B** is a true and correct copy of those emails.

6. On June 26, 2025, I further met and conferred with Plaintiff by telephone for more than one hour regarding the Motion.

7. As of the filing of this Motion, having engaged in thorough meet and confer discussions regarding the Motion, I have been unable to reach a resolution with the Plaintiff as to the issues raised in the Motion.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this declaration was executed on June 26, 2025, in Los Angeles, California.

/s/ Katherine J. Ellena
Katherine J. Ellena

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

164