

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

**SUPPLEMENTAL Declaration of  
Matthew R. Walsh re: Defendant's  
Amended RFA Responses**

**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 and  
11 would 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 1. The Court must be made aware that Defendants have falsely presented  
15 their amended responses as simple, compliant admit/deny answers in the  
16 joint table.
- 17 2. The responses shown in the table are not the responses actually served. In  
18 reality, every response was accompanied by a litany of boilerplate  
19 objections.
- 20 3. Yet, in the table, Defendants reduced those responses to bare “Admit” or  
21 “Deny” entries. That representation is inaccurate.
- 22 4. The Court should instead rely on Defendants’ actual responses provided  
23 herein and consider disregarding the table entries as “no answer  
24 provided” as they are improper third attempt to reshape their positions  
25 and assert new objections while misleading the Court .
- 26 5. Their actual responses are included herein under Exhibit 1.

27  
28 I declare under penalty of perjury under the laws of the United States of America  
29 that the foregoing is true and correct.

30  
31 Executed this March 26, 2026, in Santa Clarita, California.

32 

Matthew R. Walsh  
Plaintiff In Pro Per

33

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# EXHIBIT 1

1 Katherine J. Ellena (SBN 324160)  
kellena@reedsmith.com  
2 REED SMITH LLP  
515 South Flower Street, Suite 4300  
3 Los Angeles, CA 90071-1514  
Telephone: +1 213 457 8000  
4 Facsimile: +1 213 457 8080

5 Michael B. Galibois (*pro hac vice*)  
mgalibois@reedsmith.com  
6 Emily Graue (*pro hac vice*)  
egraue@reedsmith.com  
7 REED SMITH LLP  
10 South Wacker Drive, 40th Floor  
8 Chicago, IL 60606-7507  
Telephone: +1 312.207 1000  
9 Facsimile: +1 312.207 6400

10 *Attorneys for Defendant,*  
Rokoko Electronics, *et al.*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MATTHEW R. WALSH,  
15 Plaintiff,  
16 vs.  
17 ROKOKO ELECTRONICS, and  
18 DOES 1 through 50, inclusive,  
19 Defendant

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

Before: Hon. Otis D. Wright II  
Courtroom 5D

**DEFENDANT ROKOKO  
ELECTRONICS' SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF'S FIRST SET OF  
REQUESTS FOR ADMISSION**

State Court Action Filed: May 12, 2025  
Removal Date: June 12, 2025  
Trial Date: March 9, 2027

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: ONE (1)

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure Rule  
5 Defendant, Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the  
6 following supplemental responses (“Responses”) to Plaintiff Matthew R. Walsh’s  
7 (“Plaintiff”) First Set of Requests for Admission.

8 **PRELIMINARY STATEMENT**

9 Defendant has not fully completed its investigation of the facts and circumstances  
10 relating to this case. Defendant’s Responses herein are based only upon current  
11 information and documents known to Defendant and disclose only those contentions  
12 which presently occur to Defendant. It is anticipated that further discovery, independent  
13 investigation, legal research, and analysis will supply additional facts, add meaning to  
14 known facts, as well as establish entirely new factual conclusions and legal contentions,  
15 all of which may lead to substantial additions to, change in and variations from the  
16 contentions set forth herein.

17 The following Responses are given without prejudice to Defendant’s right to  
18 produce evidence of any subsequently discovered fact or facts which Defendant may  
19 later obtain or recall. Rokoko accordingly reserves its right to change, supplement,  
20 amend, or modify any and all Responses herein as additional facts are ascertained,  
21 analyses are made, legal research is completed, and contentions are made. Since  
22 discovery, investigation and trial preparation are currently in progress and have not yet  
23 been completed, the foregoing Responses shall in no way be construed to prohibit or  
24 limit this answering party from producing new or additional documents, facts or  
25 evidence or producing new or additional facts, contentions or theories at subsequent  
26 hearings or at the time of trial if such new or additional information later becomes  
27 available.

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1 The Responses contained herein are made in good faith effort to supply as much  
2 factual information and as much specification of legal contentions as are presently  
3 known, but should in no way be to the prejudice of the Defendant in relation to further  
4 discovery, research, or analysis.

5 **GENERAL OBJECTIONS**

6 Each of the following Responses is subject to all objections as to relevance,  
7 materiality, propriety, and admissibility and any and all objections and ground that  
8 would result in the exclusion of any statement therein if the Requests were asked of, or  
9 any statement or omission contained herein was made by, a witness present and  
10 testifying in court. Rokoko reserves the right to assert all objections and grounds against  
11 the admissibility of any Response, in whole or in part, that may be asserted at the time  
12 of trial.

13 To the extent any Request may be construed as seeking the disclosure of  
14 privileged or immune information, including without limitation, information subject to  
15 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
16 claims such privileges and/or immunities and objects to the Requests on those grounds.  
17 Further, Rokoko objects to any Request to the extent it calls for information that is  
18 subject to any other statutory and/or common-law privilege. Inadvertent disclosure of  
19 information subject to any privilege does not waive the privilege as to other information  
20 and/or documents regarding the same subject or content and does not waive Rokoko's  
21 right to object to the introduction of such privileged information and/or documents  
22 regarding the same subject or content and does not waive Rokoko's right to object to  
23 the introduction of such privileged information and/or documents into evidence.

24 To the extent these Requests demand the disclosure of information concerning  
25 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
26 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko's  
27 attorneys.

28

1 **SUPPLEMENTAL RESPONSES TO PLAINTIFF’S REQUESTS FOR**  
2 **ADMISSION**  
3 **REQUEST FOR ADMISSION NO. 4.**

4 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics share common  
5 ownership.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 4.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is vague and ambiguous with respect the term “common  
9 ownership.” Rokoko further objects that this Request is overbroad and not limited in  
10 time, scope or subject matter. Rokoko further objects that this Request seeks  
11 information not relevant to any claim or defense of any party to this action.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 4.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent that this Request is vague and ambiguous with respect the term “common  
15 ownership.” Rokoko further objects that this Request is overbroad and not limited in  
16 time, scope or subject matter. Rokoko further objects that this Request seeks  
17 information not relevant to any claim or defense of any party to this action.

18 Subject to and without waiver of the foregoing objections, Rokoko responds as  
19 follows: **Admitted** insofar as the only shared owners of Rokoko Electronics and Coco  
20 Care are minority shareholders of Rokoko Electronics with less than 2% ownership.  
21 **Denied** as to the remainder of the Request.

22 **REQUEST FOR ADMISSION NO. 5.**

23 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics have held joint or  
24 overlapping board meetings.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 5.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is compound, and based on speculation lacking factual basis.  
28 Rokoko further objects to the extent that this Request is overly broad and not limited in

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1 time, scope or subject matter. Rokoko objects to the extent that this request is vague and  
2 ambiguous with respect the terms “joint” and “overlapping”. Rokoko further objects to  
3 the Request to the extent it seeks confidential or proprietary business information in  
4 which Rokoko and/or third parties have trade secret and/or privacy rights.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 5.**

6 In addition to the General Objections set forth above, Rokoko objects to the  
7 extent that this Request is compound, and based on speculation lacking factual basis.  
8 Rokoko further objects to the extent that this Request is overly broad and not limited in  
9 time, scope or subject matter. Rokoko objects to the extent that this request is vague and  
10 ambiguous with respect the terms “joint” and “overlapping”. Rokoko further objects to  
11 the Request to the extent it seeks confidential or proprietary business information in  
12 which Rokoko and/or third parties have trade secret and/or privacy rights.

13 Subject to and without waiver of the foregoing objections, Rokoko responds as  
14 follows: **Denied.**

15 **REQUEST FOR ADMISSION NO. 6.**

16 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics share assets.

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

18 In addition to the General Objections set forth above, Rokoko objects to the  
19 extent that this Request is overly broad and not limited in time, scope or subject matter.  
20 Rokoko objects to the extent that this request is vague and ambiguous with respect the  
21 term “assets.” Rokoko further objects to the Request to the extent it seeks confidential  
22 or proprietary business information in which Rokoko and/or third parties have trade  
23 secret and/or privacy rights. Rokoko further objects to the extent that this Request seeks  
24 information not relevant to any claim or defense of any party to this action.

25 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 6.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is overly broad and not limited in time, scope or subject matter.  
28 Rokoko objects to the extent that this request is vague and ambiguous with respect the

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1 term “assets.” Rokoko further objects to the Request to the extent it seeks confidential  
2 or proprietary business information in which Rokoko and/or third parties have trade  
3 secret and/or privacy rights. Rokoko further objects to the extent that this Request seeks  
4 information not relevant to any claim or defense of any party to this action.

5 Subject to and without waiver of the foregoing objections, Rokoko responds as  
6 follows: **Denied.**

7 **REQUEST FOR ADMISSION NO. 10.**

8 Admit that Defendants represented in filings with this Court that Rokoko had no  
9 business ties to California.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 10.**

11 In addition to the General Objections set forth above, Rokoko objects to this  
12 Request the extent that the phrase “business ties” is vague and ambiguous. Rokoko  
13 further objects to this Request on grounds that it seeks information that is not relevant  
14 to a claim or defense of any party and/or not reasonably calculated to lead to the  
15 discovery of admissible evidence. In his Notice of Partial Withdrawal of Motion,  
16 Plaintiff withdrew Motion to Strike as it pertained to jurisdiction and acquiesced to the  
17 jurisdiction of this Court.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 10.**

19 In addition to the General Objections set forth above, Rokoko objects to this  
20 Request the extent that the phrase “business ties” is vague and ambiguous. Rokoko  
21 further objects to this Request on grounds that it seeks information that is not relevant  
22 to a claim or defense of any party and/or not reasonably calculated to lead to the  
23 discovery of admissible evidence. In his Notice of Partial Withdrawal of Motion,  
24 Plaintiff withdrew Motion to Strike as it pertained to jurisdiction and acquiesced to the  
25 jurisdiction of this Court.

26 Subject to and without waiver of the foregoing objections, Rokoko responds as  
27 follows: **Denied.**

28

1 **REQUEST FOR ADMISSION NO. 16.**

2 Admit that before March 2025, your terms of service never granted you the rights  
3 to use or resell user animations.

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

5 In addition to the General Objections set forth above, Rokoko objects to the  
6 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent  
7 that this Request lacks any temporal limitation, and is therefore unlimited as to scope  
8 and time, impermissibly broad, and unduly burdensome. Rokoko further objects to the  
9 extent that this Request is vague and ambiguous with respect to the terms “terms of  
10 service,” “rights,” “use,” and “resell,” such that Rokoko is unable to formulate a  
11 response or otherwise admit in good faith.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 16.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent  
15 that this Request lacks any temporal limitation, and is therefore unlimited as to scope  
16 and time, impermissibly broad, and unduly burdensome. Rokoko further objects to the  
17 extent that this Request is vague and ambiguous with respect to the terms “terms of  
18 service,” “rights,” “use,” and “resell,” such that Rokoko is unable to formulate a  
19 response or otherwise admit in good faith.

20 Subject to and without waiver of the foregoing objections, Rokoko responds as  
21 follows: **Denied.**

22 **REQUEST FOR ADMISSION NO. 17.**

23 Admit that after March 2025, your terms of service were changed to grant you  
24 the right to “anonymize” animations and resell them to third parties.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 17.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent  
28 that this Request is overbroad as to scope. Rokoko further objects to the extent that this

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1 Request is duplicative of Request for Admission No. 16. Rokoko further objects to the  
2 extent that this Request is vague and ambiguous with respect to the terms “changed,”  
3 “anonymize,” and “resell.”

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 17.**

5 In addition to the General Objections set forth above, Rokoko objects to the  
6 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent  
7 that this Request is overbroad as to scope. Rokoko further objects to the extent that this  
8 Request is duplicative of Request for Admission No. 16. Rokoko further objects to the  
9 extent that this Request is vague and ambiguous with respect to the terms “changed,”  
10 “anonymize,” and “resell.”

11 Subject to and without waiver of the foregoing objections, Rokoko responds as  
12 follows: **Denied.**

13 **REQUEST FOR ADMISSION NO. 20.**

14 Admit that your animations contain CMI including but not limited to (authors  
15 name, unique serial numbers, other unique identifiers).

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

17 In addition to the General Objections set forth above, Rokoko objects to the  
18 extent that this Request is vague and ambiguous with respect to the term “CMI.”  
19 Rokoko further objects that the Request is compound, vague, and ambiguous as  
20 phrased, such that Rokoko is unable to formulate a response or otherwise admit in good  
21 faith. Rokoko further objects to the extent that this Request seeks confidential or  
22 proprietary information protected by trade secret, the right to privacy, or any other  
23 applicable right or privilege.

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

25 In addition to the General Objections set forth above, Rokoko objects to the  
26 extent that this Request is vague and ambiguous with respect to the term “CMI.”  
27 Rokoko interprets “CMI” to mean industry standard data saved with any animations.  
28 Rokoko further objects that the Request is compound, vague, and ambiguous as

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1 phrased, such that Rokoko is unable to formulate a response or otherwise admit in good  
2 faith. Rokoko further objects to the extent that this Request seeks confidential or  
3 proprietary information protected by trade secret, the right to privacy, or any other  
4 applicable right or privilege. Rokoko further objects to the Request to the extent it seeks  
5 a legal conclusion as to what constitutes “CMI”.

6 Subject to and without waiver of the foregoing objections, Rokoko responds as  
7 follows: **Admit** insofar as Rokoko can view unique serial numbers associated with a  
8 user’s device when the user is connected to Rokoko software. **Denied** as to the  
9 remainder of the Request.

10 **REQUEST FOR ADMISSION NO. 25.**

11 Admit that your claim of having “teams” at offices worldwide was inaccurate.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 25.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent that the Request seeks information that is not relevant to any claim or defense in  
15 this action. Rokoko further objects to the extent that this Request is impermissibly  
16 overbroad and unlimited in scope and time.

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 25.**

18 In addition to the General Objections set forth above, Rokoko objects to the  
19 extent that the Request seeks information that is not relevant to any claim or defense in  
20 this action. Rokoko further objects to the extent that this Request is impermissibly  
21 overbroad and unlimited in scope and time.

22 Subject to and without waiver of the foregoing objections, Rokoko responds as  
23 follows: **Denied.**

24 **REQUEST FOR ADMISSION NO. 29.**

25 Admit you made the following statement “*We will therefore offer to send you*  
26 *what you have listed below on the condition that this closes the case immediately.*” --  
27 “*we are willing to go further and help you get quickly back to your projects*” -- “*That*  
28 *will allow both you and us to go back to work, which ultimately should be the goal.*”

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 29.**

2 In addition to the General Objections set forth above, Rokoko objects that this  
3 Request is ambiguous insofar as it fails to identify where the quoted language comes  
4 from, such that Rokoko is unable to admit in good faith. Rokoko further objects to the  
5 extent that this Request is vague, ambiguous, and improperly compound insofar as it  
6 seeks an admission to several statements.

7 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 29.**

8 In addition to the General Objections set forth above, Rokoko objects that this  
9 Request is ambiguous insofar as it fails to identify where the quoted language comes  
10 from, such that Rokoko is unable to admit in good faith. Rokoko further objects to the  
11 extent that this Request is vague, ambiguous, and improperly compound insofar as it  
12 seeks an admission to several statements.

13 Subject to and without waiver of the foregoing objections, Rokoko responds as  
14 follows: **Admit** that Mikkel Overby made the statements referenced in RFA No. 29 by  
15 email dated May 7, 2025, which email must be read as a whole.

16 **REQUEST FOR ADMISSION NO. 36.**

17 Admit you stated to customers *“By continuing to use Rokoko products after*  
18 *march 22, 2025, you’ll be agreeing to the updated terms”*

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

20 In addition to the General Objections set forth above, Rokoko objects to the  
21 extent that this Request fails to provide enough specificity to identify the source of the  
22 quoted language, such that the Request is vague and ambiguous. Rokoko further objects  
23 to the extent that this Request is overbroad as to scope and time.

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

25 In addition to the General Objections set forth above, Rokoko objects to the  
26 extent that this Request fails to provide enough specificity to identify the source of the  
27 quoted language, such that the Request is vague and ambiguous. Rokoko further objects  
28 to the extent that this Request is overbroad as to scope and time.

1 Subject to and without waiver of the foregoing objections, Rokoko responds as  
2 follows: **Admit** that Rokoko’s 2025 Terms, which must be read as a whole, contain the  
3 quoted statement in RFA No. 36.

4 **REQUEST FOR ADMISSION NO. 47.**

5 Admit some or all of your senior staff lives and works in or around Tranbjerg.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 47.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
9 this Request is unduly burdensome and harassing insofar as it seeks private and personal  
10 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
11 Request to the extent that it seeks information that is not relevant to a claim or defense  
12 of any party and/or not reasonably calculated to lead to the discovery of admissible  
13 evidence.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 47.**

15 In addition to the General Objections set forth above, Rokoko objects to the  
16 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
17 this Request is unduly burdensome and harassing insofar as it seeks private and personal  
18 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
19 Request to the extent that it seeks information that is not relevant to a claim or defense  
20 of any party and/or not reasonably calculated to lead to the discovery of admissible  
21 evidence.

22 Subject to and without waiver of the foregoing objections, Rokoko responds as  
23 follows: **Denied.**

24 **REQUEST FOR ADMISSION NO. 48.**

25 Admit some or all of your senior staff lives and works in or around Fyn.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 48.**

27 In addition to the General Objections set forth above, Rokoko objects to the  
28 extent that this Request is overbroad as to scope and time. Rokoko further objects that

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1 this Request is unduly burdensome and harassing insofar as it seeks private and personal  
2 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
3 Request to the extent that it seeks information that is not relevant to a claim or defense  
4 of any party and/or not reasonably calculated to lead to the discovery of admissible  
5 evidence.

6 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 48.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
9 this Request is unduly burdensome and harassing insofar as it seeks private and personal  
10 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
11 Request to the extent that it seeks information that is not relevant to a claim or defense  
12 of any party and/or not reasonably calculated to lead to the discovery of admissible  
13 evidence.

14 Subject to and without waiver of the foregoing objections, Rokoko responds as  
15 follows: **Denied.**

16  
17 DATED: March 20, 2026

REED SMITH LLP

18  
19 By: /s/ Katherine J. Ellena  
20 Katherine J. Ellena  
Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

21 *Attorneys for Defendant*  
22 *Rokoko Electronics*  
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**CERTIFICATE OF SERVICE**


I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On March 20, 2026, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS’ SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on March 20, 2026 at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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1 Katherine J. Ellena (SBN 324160)  
kellena@reedsmith.com  
2 REED SMITH LLP  
515 South Flower Street, Suite 4300  
3 Los Angeles, CA 90071-1514  
Telephone: +1 213 457 8000  
4 Facsimile: +1 213 457 8080

5 Michael B. Galibois (*pro hac vice*)  
mgalibois@reedsmith.com  
6 Emily Graue (*pro hac vice*)  
egraue@reedsmith.com  
7 REED SMITH LLP  
10 South Wacker Drive, 40th Floor  
8 Chicago, IL 60606-7507  
Telephone: +1 312.207 1000  
9 Facsimile: +1 312.207 6400

10 *Attorneys for Defendant,*  
Rokoko Electronics, *et al.*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MATTHEW R. WALSH,  
15 Plaintiff,

16 vs.

17 ROKOKO ELECTRONICS, and  
18 DOES 1 through 50, inclusive,  
19 Defendant

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

Before: Hon. Otis D. Wright II  
Courtroom 5D

**DEFENDANT ROKOKO  
ELECTRONICS' SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF'S SECOND SET OF  
REQUESTS FOR ADMISSION**

State Court Action Filed: May 12, 2025  
Removal Date: June 12, 2025  
Trial Date: March 9, 2027

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: TWO (2)

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure Rule  
5 Defendant, Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the  
6 following supplemental responses (“Responses”) to Plaintiff Matthew R. Walsh’s  
7 (“Plaintiff”) Second Set of Requests for Admission.

8 **PRELIMINARY STATEMENT**

9 Defendant has not fully completed its investigation of the facts and circumstances  
10 relating to this case. Defendant’s Responses herein are based only upon current  
11 information and documents known to Defendant and disclose only those contentions  
12 which presently occur to such Defendant. It is anticipated that further discovery,  
13 independent investigation, legal research, and analysis will supply additional facts, add  
14 meaning to known facts, as well as establish entirely new factual conclusions and legal  
15 contentions, all of which may lead to substantial additions to, change in and variations  
16 from the contentions set forth herein.

17 The following Responses are given without prejudice to Defendant’s right to  
18 produce evidence of any subsequently discovered fact or facts which Defendant may  
19 later obtain or recall. Rokoko accordingly reserves its right to change, supplement,  
20 amend, or modify any and all Responses herein as additional facts are ascertained,  
21 analyses are made, legal research is completed, and contentions are made. Since  
22 discovery, investigation and trial preparation are currently in progress and have not yet  
23 been completed, the foregoing Responses shall in no way be construed to prohibit or  
24 limit this answering party from producing new or additional documents, facts or  
25 evidence or producing new or additional facts, contentions or theories at subsequent  
26 hearings or at the time of trial if such new or additional information later becomes  
27 available.

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1 The Responses contained herein are made in good faith effort to supply as much  
2 factual information and as much specification of legal contentions as are presently  
3 known, but should in no way be to the prejudice of the Defendant in relation to further  
4 discovery, research, or analysis.

5 **GENERAL OBJECTIONS**

6 Each of the following Responses is subject to all objections as to relevance,  
7 materiality, propriety, and admissibility and any and all objections and ground that  
8 would result in the exclusion of any statement therein if the requests were asked of or  
9 any statement or omission contained herein was made by a witness present and  
10 testifying in court. The Defendant reserves the right to assert all objections and grounds  
11 against the admissibility of any Response, in whole or in part, that may be asserted at  
12 the time of trial.

13 To the extent any Request may be construed as seeking the disclosure of  
14 privileged or immune information, including without limitation, information subject to  
15 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
16 claims such privileges and/or immunities and objects to the Requests on those grounds.  
17 Further, Rokoko objects to any Request to the extent it calls for information that is  
18 subject to any other statutory and/or common-law privilege. Inadvertent disclosure of  
19 information subject to any privilege does not waive the privilege as to other information  
20 and/or documents regarding the same subject or content and does not waive Rokoko's  
21 right to object to the introduction of such privileged information and/or documents  
22 regarding the same subject or content and does not waive Rokoko's right to object to  
23 the introduction of such privileged information and/or documents into evidence.

24 To the extent these Requests demand the disclosure of information concerning  
25 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
26 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko's  
27 attorneys.

28

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**SUPPLEMENTAL RESPONSES TO PLAINTIFF’S REQUESTS FOR  
ADMISSION**

**REQUEST FOR ADMISSION NO. 9.**

Admit that Defendant or it’s subsidiaries has an interest in the Delaware LLC: Rokoko, LLC.

**RESPONSE TO REQUEST FOR ADMISSION NO. 9.**

In addition to the General Objections set forth above, Rokoko objects to the extent this Request is vague and ambiguous with respect to the terms “subsidiaries” and “interest,” such that Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko further objects to the extent this Request is overbroad as to scope and time. Rokoko further objects to the extent this Request is improperly compound insofar as it seeks and admission regarding both “Defendant” and “it’s subsidiaries.”

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 9.**

In addition to the General Objections set forth above, Rokoko objects to the extent this Request is vague and ambiguous with respect to the terms “subsidiaries” and “interest,” such that Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko further objects to the extent this Request is overbroad as to scope and time. Rokoko further objects to the extent this Request is improperly compound insofar as it seeks and admission regarding both “Defendant” and “it’s subsidiaries.”

Subject to and without waiving the foregoing objections, Rokoko responds as follows: **Denied.**

**REQUEST FOR ADMISSION NO. 11.**

Admit you have less than 30 employees.

**RESPONSE TO REQUEST FOR ADMISSION NO. 11.**

In addition to the General Objections set forth above, Rokoko further objects to the extent this Request is overbroad as to scope and time. Rokoko further objects to the extent this Request seeks information that is not relevant to any claims or defenses of any party to this action, and that this Request is unduly burdensome and harassing.

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1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 11.**

2 In addition to the General Objections set forth above, Rokoko further objects to  
3 the extent this Request is overbroad as to scope and time. Rokoko further objects to the  
4 extent this Request seeks information that is not relevant to any claims or defenses of  
5 any party to this action, and that this Request is unduly burdensome and harassing.

6 Subject to and without waiving the foregoing objections, Rokoko responds as  
7 follows: **Denied.**

8 **REQUEST FOR ADMISSION NO. 20.**

9 Admit that you have more customers in California than Denmark.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

11 In addition to the General Objections set forth above, Rokoko objects to the  
12 extent that this Request is vague and ambiguous with respect to the term “customers.”  
13 Rokoko further objects that this Request is overbroad as to scope and time. Rokoko  
14 further objects to the extent that this Request seeks information that is not relevant the  
15 claims or defenses of any party to this action.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

17 In addition to the General Objections set forth above, Rokoko objects to the  
18 extent that this Request is vague and ambiguous with respect to the term “customers.”  
19 Rokoko further objects that this Request is overbroad as to scope and time. Rokoko  
20 further objects to the extent that this Request seeks information that is not relevant the  
21 claims or defenses of any party to this action.

22 Subject to and without waiving the foregoing objections, Rokoko responds as  
23 follows: **Admit.**

24 **REQUEST FOR ADMISSION NO. 35.**

25 Admit that Mikkel Overby’s initial declaration contains a handwritten signature  
26 placed by him.

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**RESPONSE TO REQUEST FOR ADMISSION NO. 35.**

In addition to the General Objections set forth above, Rokoko objects that this Request fails to identify the “initial declaration” with sufficient particularity, rendering the the Request is vague and ambiguous such that Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko further objects that this Request is overbroad as to time and scope. Rokoko further objects that the methods by which Rokoko drafts litigation documents is not relevant to any claim or defense of any party to this action.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 35.**

In addition to the General Objections set forth above, Rokoko objects that this Request fails to identify the “initial declaration” with sufficient particularity, rendering the Request vague and ambiguous such that Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko further objects that this Request is overbroad as to time and scope. Rokoko further objects that the methods by which Rokoko drafts litigation documents is not relevant to any claim or defense of any party to this action.

Subject to and without waiving the foregoing objections, Rokoko responds as follows: **Admit** that the June 11, 2025 declaration of Mikkell Overby contains Mr. Overby’s digital handwritten signature.

**REQUEST FOR ADMISSION NO. 36.**

Admit that Mikkell Overby’s second declaration contains a DocuSign signature because it was drafted by ReedSmith and sent to him for signature.

**RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

In addition to the General Objections set forth above, Rokoko objects that this Request fails to identify the “second declaration” with sufficient particularity, rendering the Request vague and ambiguous such that Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko further objects that this Request is improperly compound and overbroad as to time and scope. Rokoko further objects that to the extent that this Request seeks information protected by the work product doctrine, attorney-

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1 client privilege, or any other applicable privilege. Rokoko further objects that the  
2 methods by which Rokoko drafts litigation documents is not relevant to any claim or  
3 defense of any party to this action.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

5 In addition to the General Objections set forth above, Rokoko objects that this  
6 Request fails to identify the “second declaration” with sufficient particularity, rendering  
7 the Request vague and ambiguous such that Rokoko is unable to formulate a response  
8 or otherwise admit in good faith. Rokoko further objects that this Request is improperly  
9 compound and overbroad as to time and scope. Rokoko further objects that to the extent  
10 that this Request seeks information protected by the work product doctrine, attorney-  
11 client privilege, or any other applicable privilege. Rokoko further objects that the  
12 methods by which Rokoko drafts litigation documents is not relevant to any claim or  
13 defense of any party to this action.

14 Subject to and without waiving the foregoing objections, Rokoko responds as  
15 follows: **Admit** that the July 28, 2025 declaration of Mikkel Overby was signed through  
16 DocuSign. **Denied** as to the remainder of RFA No. 36.

19 DATED: March 20, 2026

REED SMITH LLP

21 By: /s/ Katherine J. Ellena  
Katherine J. Ellena  
22 Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

23 *Attorneys for Defendant*  
24 *Rokoko Electronics*

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**CERTIFICATE OF SERVICE**


I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On March 20, 2026, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS’ SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO PLAINTIFF’S  
SECOND SET OF REQUESTS FOR ADMISSION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on March 20, 2026 at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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