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2025 JUN 17 PM 3:52

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

BY:

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

8 MATTHEW R. WALSH  
9 19197 GOLDEN VALLEY RD #333  
10 SANTA CLARITA, CA 91387,

11 Plaintiff In Pro Per,

12 vs.

13 ROKOKO ELECTRONICS  
14 (AND DOES 1 THROUGH 50, INCLUSIVE)  
15 31416 AGOURA RD STE 118  
16 WESTLAKE VILLAGE, CA  
17 91361

18 Defendant

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

**SUPPLEMENTAL DECLARATION OF  
MATTHEW R. WALSH IN SUPPORT OF  
PLAINTIFF'S MOTION TO STRIKE  
DEFENDANT'S EX PARTE  
APPLICATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

**SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF  
PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S EX PARTE APPLICATION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

20 I, Matthew R. Walsh, declare as follows:

- 21
- 22 1. I am the Plaintiff in the above-captioned matter. I submit this supplemental declaration in
- 23 further support of my Motion to Strike Defendant's Ex Parte Application for Extension of
- 24 Time to Respond to the Complaint. I have personal knowledge of the facts set forth
- 25 herein and, if called to testify, could and would competently do so.
- 26
- 27 2. On June 15, 2025, the Court issued a **Notice of Pro Hac Vice Application Due** (Dkt.
- 28 Nos. 7, 8) as to **Emily Graue** and **Michael Galibois**, stating that both attorneys had been

1           **removed as counsel of record** for failure to file the required Pro Hac Vice applications  
2           and would not be added back to the docket until properly admitted.

- 3
- 4           3. Despite this removal, on **June 16, 2025**, Ms. Graue continued to communicate with me  
5           by telephone and by email **as if she remained authorized counsel of record**, issuing  
6           procedural instructions and her intentions to continue acting as counsel regarding their  
7           forthcoming Ex Parte Application and oppositions and stating that I must respond within  
8           24 hours. A true and correct copy of this correspondence is attached hereto as (**Exhibit**  
9           **A, B**).
- 10           4. The ex parte application Ms. Graue referenced was filed **later that same day** (Dkt. No.  
11           15), and she is listed on the docket as filing attorney despite lacking admission or  
12           standing to act as counsel in this Court at the time.
- 13
- 14           5. Defendant's June 16 filing is signed by one admitted attorney and two non-admitted  
15           individuals, with the notation 'PHV forthcoming.' This is a tacit admission that the filing  
16           was **procedurally defective** and executed by attorneys without standing before this  
17           Court, in direct violation of L.R. 83-2.1.3.4. (Exhibit C)
- 18
- 19           6. The conduct described above appears to violate this Court's June 15 removal notices and  
20           Local Rules governing attorney admission. It also directly undermines the procedural  
21           legitimacy of Defendant's Ex Parte Application.
- 22           7. I respectfully request that the Court take judicial notice of this irregularity, disregard any  
23           filing submitted by unauthorized counsel, and consider striking Defendant's Ex Parte  
24           Application in its entirety as procedurally improper and filed by attorneys lacking  
25           standing before this Court.
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 17th day of June, 2025, in Santa Clarita, California.



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Matthew R. Walsh  
Plaintiff In Pro Per

1 **EXHIBIT A**

2 Defendant's counsel Emily Graue continued to practice law despite the Court notifying her she  
3 has no Pro Hac Vice status and has been removed from the docket.

4 Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



5 Graue, Emily H. <EGraue@reedsmith.com>  
6 To matthew@winteryear.com  
Cc Galibois, Michael B; Ellena, Katherine J.

7 < Reply << Reply All -> Forward ...

8 Mon 6/16/2025 2:15 PM

9 ⓘ You replied to this message on 6/16/2025 2:46 PM.

10 Mr. Walsh,

11 Defendant Rokoko Electronics, via counsel Reed Smith LLP, will be filing an Ex Parte Application for Additional Time to Respond to the Complaint  
12 today, June 16, 2025, pursuant to Local Rule 8-3. This was also indicated when we spoke on the phone earlier. If you wish to oppose this motion,  
13 you must respond within 24 hours. Please let us know if you have any questions or would like to discuss further.

14 Best,

15 **Emily Graue**  
16 Associate  
17 Global Commerical Disputes  
18 *She/Her/Hers*

19 EGraue@reedsmith.com  
20 D: +1 312 207 2954  
21 M: +1 630 895 1773

22 **Reed Smith**  
23 10 South Wacker Drive  
24 Chicago, IL 60606-7507  
25 T: +1 312 207 1000  
26 F: +1 312 207 6400  
27 reedsmith.com

28 This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of  
its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes,  
or disclose its contents to any other person. Thank you for your cooperation.

**EXHIBIT B**

Defendant’s counsel Emily Graue continued to practice law despite the Court notifying her she has no Pro Hac Vice status and has been removed from the docket.

RE: Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



Graue, Emily H. <EGraue@reedsmith.com>  
To matthew@winteryear.com  
Cc Galibois, Michael B.; Ellena, Katherine J.

Reply Reply All Forward

Mon 6/16/2025 3:32 PM

Thanks for your note, Mr. Walsh. We understand you’re not inclined to agree with any points of law or fact we offer. That’s ok. Both sides can agree to disagree. Not uncommon at all—we can let the court to decide. But as you asked for our position, it is clear that removal divests the state court of jurisdiction until your remand motion is decided in federal court. The state court equally will understand this point. So, we intend to oppose your remand motion. If remand is denied (which is our position it clearly should be), then the matter will proceed in federal court. If remand is granted (as is your position), the matter would be remanded to proceed then in state court.

Hope this is helpful at least in confirming our position.

In the interim, with respect to electronic service in federal court, please see C.D. Cal. Local Rule 5-3 and note that the parties are required to follow this rule. Separately, any state court filing is improper for the reasons set forth above and so we do not consent to electronic service.

Best,

Emily Graue  
Associate  
Global Commerical Disputes  
She/Her/Hers

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F: +1 312 207 6400  
[reedsmith.com](http://reedsmith.com)



1 **PROOF OF SERVICE**

2 I, Matthew R. Walsh, declare:

3 I am a resident of the State of California, over the age of eighteen years, and a party to this  
4 action. My business address is 19197 Golden Valley Rd #333, Santa Clarita, CA 91387.

5 On June 17, 2025, I served the following document(s):

6 **SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF**  
7 **PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S EX PARTE APPLICATION FOR**  
8 **EXTENSION OF TIME TO RESPOND TO COMPLAINT**

9  by transmitting a true copy via electronic mail to the following email address(es):

10 **Reed Smith LLP (Counsel for Defendant)**

11 Heather Valencia, Esq.

12 Hvalencia@reedsmith.com

13  By placing a true and correct copy in a sealed envelope, with first-class postage fully prepaid,  
14 and depositing it in the United States Mail at Santa Clarita, California, addressed as follows:

15 **Reed Smith LLP (Counsel for Defendant)**

16 Heather Valencia, Esq.

17 515 South Flower Street, Suite 4300

18 Los Angeles, CA 90071

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

21 Executed on June 17, 2025

22 Santa Clarita, California



23 \_\_\_\_\_  
24 Matthew R. Walsh  
25 Plaintiff In Pro Per  
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27  
28