

REED SMITH LLP
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Katherine J. Ellena (SBN 324160)
kellena@reedsmith.com
Gerardo V. Gorospe IV (SBN 352854)
vgorospe@reedsmith.com
REED SMITH LLP
515 South Flower Street, Suite 4300
Los Angeles, CA 90071-1514
Telephone: +1 213 457 8000
Facsimile: +1 213 457 8080

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

Attorneys for Defendant,
Rokoko Electronics

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MATTHEW R. WALSH

Plaintiff,

vs.

ROKOKO ELECTRONICS, and
DOES 1 through 50, inclusive,

Defendant.

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

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

**DECLARATION OF GERARDO V.
GOROSPE IN SUPPORT OF
DEFENDANT ROKOKO
ELECTRONICS' APPLICATION TO
FILE UNDER SEAL LIMITED
EXCERPTS OF DEPOSITION
TESTIMONY IN SUPPORT OF ITS
REPLY TO PLAINTIFF'S
RESPONSE TO ORDER TO SHOW
CAUSE**

*[Concurrently filed with Application to
Seal; Proposed Order]*

Fact Discovery Closes: August 10, 2026
Trial Date: March 9, 2027

DECLARATION OF GERARDO VALENTINO GOROSPE IV

I, Gerardo Valentino Gorospe IV, 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 Application to File Under Seal Limited Portions (“Application”) of Its Reply (“Reply”) to Plaintiff Matthew R. Walsh’s (“Plaintiff,” and together with Rokoko, “Parties”) Response to Order to Show Cause (“Response”).

3. Plaintiff’s Response cites and characterizes testimony from the May 28, 2026 deposition of Mikkel Overby. I attended the May 28, 2026 deposition of Mikkel Overby taken by Plaintiff. Counsel for Rokoko designated the deposition transcript confidential.

4. Rokoko’s Reply addresses Plaintiff’s characterization of Mr. Overby’s deposition testimony. Exhibit G to the Declaration of Gerardo V. Gorospe in support of Rokoko’s Reply, lodged concurrently with this motion, consists of relevant excerpts of the rough transcript of Mr. Overby’s deposition.

5. As of the filing of Rokoko’s Reply and this Application, the parties have not yet received the official certified transcript of Mr. Overby’s deposition. Rokoko is lodging the rough excerpt because Plaintiff cited and characterized Mr. Overby’s testimony in his Response, and Rokoko’s Reply is due within the seven-day period set by the court. Rokoko will provide the certified excerpt if the Court requests it or if the certified transcript materially differs from the rough excerpt lodged with Rokoko’s Reply.

6. The concurrently lodged excerpt includes testimony concerning a confidential agreement between Rokoko and a third party. The testimony consists of confidential commercial and business information of the type recognized by the

1 Protective Order entered in this action (ECF No. 149) and was designated by Rokoko
2 as Confidential pursuant to the Protective Order.

3 7. Consistent with the Stipulated Protective Order in this action (ECF No.
4 149), Rokoko seeks a limited sealing to protect Rokoko's confidential and proprietary
5 information, trade secrets, valuable research and development information, commercial
6 information, confidential business information, information implicating third-party
7 privacy rights, and information protected from disclosure by applicable legal principles.

8 8. Based on my review of the materials to be filed, the requested sealing is
9 limited to Exhibit G of the Gorospe Declaration and the targeted Reply passages
10 necessary to respond to Plaintiff's characterization of Mr. Overby's deposition
11 testimony. The public versions of Rokoko's filings do not disclose the confidential
12 substance of the sealed transcript excerpts.

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14 I declare under penalty of perjury under the laws of the United States of America
15 that the foregoing is true and correct. Executed on this 30th day of June 2026, in Los
16 Angeles, California.

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19 Gerardo Valentino Gorospe IV
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