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A limited liability partnership formed in the State of Delaware

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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]*

**AMENDED DECLARATION OF
GERARDO V. GOROSPE IN
SUPPORT OF ROKOKO'S REPLY
TO PLAINTIFF'S RESPONSE TO
ORDER TO SHOW CAUSE**

*[Concurrently filed with Reply to
Plaintiff's Response to Order to Show
Cause]*

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

DECLARATION OF GERARDO V. GOROSPE

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 Reply to Plaintiff’s Response to Order to Show Cause (“Response”) filed by Plaintiff Matthew R. Walsh (“Plaintiff,” and together with Rokoko, “Parties”).

3. On June 26, 2026, I accessed the public Facebook page for The Next World through an internet browser. I scrolled through the posts on The Next World’s Facebook page until I came to a post dated September 6, 2020. The Facebook page can be found at: <https://www.facebook.com/thenextworldvideogame/>.

4. The September 6, 2020 Facebook post is a name change announcement for Plaintiff’s game The Nothing. In the post, Plaintiff states that due to a trademark issue, he has decided to change the name of the video game to The Next World. The Facebook post is attached hereto as **Exhibit A**.

5. On June 29, 2026, I accessed Plaintiff’s productions and reviewed the materials. Part of Plaintiff’s productions to Rokoko included a “making of The Next World” booklet, describing the development of his video game. (“Booklet”). A true and correct copy of the cover of the Booklet produced in this action as WALSH002563¹ is attached hereto as **Exhibit B**.

6. A true and correct copy of a page of the Booklet, which includes game development screenshots watermarked “NOTHING” and described as “Circa September 2017” and produced in this action as WALSH002567, is attached hereto as **Exhibit C**.

¹ Plaintiff’s document productions in this action assign Bates numbers by file name, rather than by Bates-stamping on the page. Exhibits B-F are attached as produced by Plaintiff to Rokoko in this action, *i.e.*, without Bates stamps.

1 7. A true and correct copy of a page of the Booklet, which ascribes the name
2 “Dresden v2.5” to the same character from the cover of the Booklet and produced in
3 this action as WALSH002576, is attached hereto as **Exhibit D**.

4 8. A true and correct copy of a page from the Booklet, detailing Walsh’s
5 onboarding of Ron Wasserman as the game’s composer and Kathy Fisher
6 (Wasserman’s wife) as a voice actress on the project, produced in this action as
7 WALSH002568, is attached hereto as **Exhibit E**.

8 9. A true and correct copy of a page from the Booklet, showing Walsh’s 2018
9 introduction to and onboarding of Alexis Mincolla as the “villain” of his game,
10 produced in this action as WALSH002578, is attached hereto as **Exhibit F**.

11 10. On May 28, 2026, my colleague Katherine J. Ellena and I attended the
12 deposition of Mikkel Overby taken by Plaintiff. Uncertified rough transcript excerpts
13 of the deposition of Mikkel Overby are lodged under seal as **Exhibit G**. A rough
14 transcript is being lodged at this time because Plaintiff’s Response cites to and
15 characterizes the rough transcript, and Rokoko’s Reply is due within the Court’s seven-
16 day deadline as per ECF No. 198.

17 11. On April 22, 2026, Rokoko served Plaintiff with its Third Set of Requests
18 for Production, including RFP No. 93, which requested the production of all documents
19 submitted by Plaintiff to the U.S. Copyright Office in connection with his copyright
20 registration number Pau 4-279-489. A true and correct copy of Rokoko’s Third Set of
21 Requests for Production is attached hereto as **Exhibit H**.

22 12. On May 27, 2026, Plaintiff served his responses and objections to
23 Rokoko’s Third Set of Requests for Production. A true and correct copy of Plaintiff’s
24 responses and objections to Rokoko’s Third Set of Requests for Production, which were
25 served on Rokoko as a plain-text file, are attached hereto as **Exhibit I**.

26 13. On June 11, 2026, I met and conferred with Plaintiff regarding his
27 responses and objections to Rokoko’s Third Set of Requests for Production. Plaintiff
28 stated that he would stand on his objections to RFP No. 93 and that he would not

1 produce responsive documents absent a Court order compelling him to do so. A true
2 and correct copy of June 11, 2026 email correspondence memorializing the meet and
3 confer discussions between the Parties is attached hereto as **Exhibit J**.

4
5 I declare under penalty of perjury under the laws of the United States of America
6 that the foregoing is true and correct. Executed on this 30th day of June 2026, in Los
7 Angeles, California.

8
9 *Gerardo Valentino Gorospe IV*
10 Gerardo Valentino Gorospe IV

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EXHIBIT A

The Next World | Facebook

facebook.com/thenextworldvideogame/

facebook

Email or phone

Password

Log In

Forgot Account?



The Next World

...

Intro

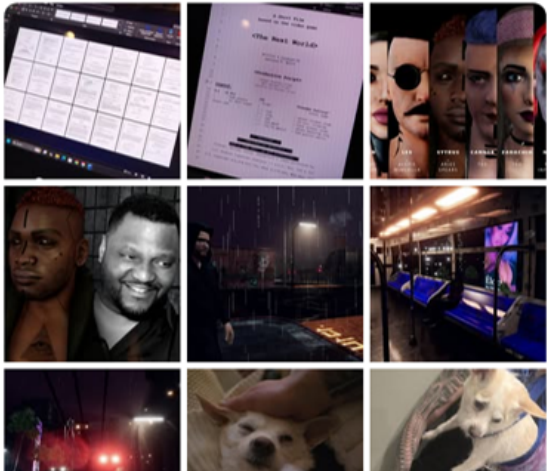
 Page · Video Game

 [winteryeargames](#)

 [winteryear.com](#)

Photos

[See all photos](#)





The Next World

September 6, 2020 · 🌐

MASSIVE ANNOUNCEMENT

Not the one you want though.
Without going into too much detail....

I was once young, dumb, and naive and came across a trademark holder while originally registering the game in 2016; USPTO told me to contact him and work it out. He had registered "NOTHING" for only website development, so, me being naive at the time --- said "Hey guy! I'm another guy! I make games! I'm registering THE NOTHING and will not infringe on you!"

First thing that guy did? Challenge me at the trademark office and then consult an attorney and retroactively register "THE NOTHING" as an extension to his "NOTHING" trademark. The class he registered? --- Video games. His response was "I might want to make video games one day"

Yep, sure buddy.

So... for the last 4 years I was in a "fuck this guy" mood, since legally he can't do ANYTHING as I was using the name prior to his mark.... BUTTTTTT.... The court of public opinion, and the processes involved in having your FB and IG pages pulled due to trademark issues, having your game pulled out of every online store until it's resolved... My limited predictive capabilities tell me that can/will be detrimental as the game nears/exceeds release.

The Next World | Facebook

facebook.com/thenextworldvideogame/

facebook

Email or phonePasswordLog InForgot Account?

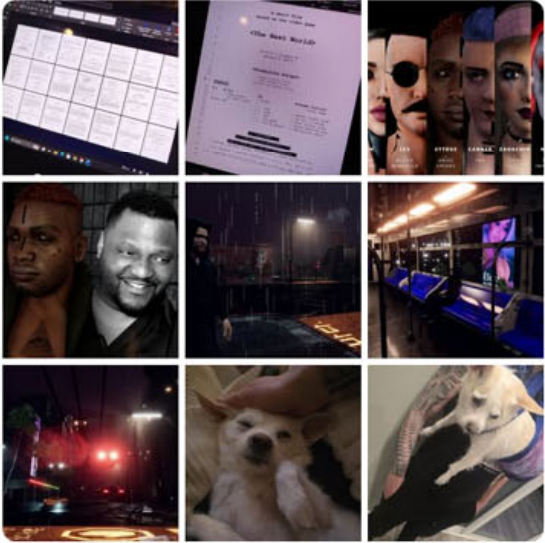
The Next World

 [winteryeargames](#)

 [winteryear.com](#)

Photos

See all photos



game nears/exceeds release.

So...

It's with a heavy heart, but also, with a huge sigh of relief that I announce the new name of the game...

"THE NEXT WORLD"

The chapter of the game will be known as: THE NOTHING.

As probably everyone knows, the entire story of the game -- the premise -- is the main character encountering a hidden world between the connected minds of all humans on earth implanted with a cybernetic NeuroLink device -- the hidden world is known as "The Nothing"; so it seems fitting still that the name bears witness while becoming transcendent.

Ideologically, this opens the story line and maybe the characters, depending on how they are received, up to additional chapters and expansions.

Comment, question, flame, punch, kick, spit or congratulate in the comments.

Either way, it's trademarked, it's secure, and we can continue without anyone (especially the players) really losing anything or getting tied up in legal bullshit that could impact the gaming experience. [See less](#)



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The Next World | Facebook

facebook.com/thenextworldvideogame/

facebook

Email or phone

Password

Log In

Forgot Account?

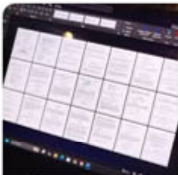
The Next World

winteryeargames

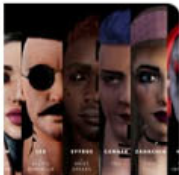
winteryear.com

Photos

See all photos

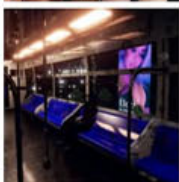


















Comment, question, flame, punch, kick, spit or congratulate in the comments.

Either way, it's trademarked, it's secure, and we can continue without anyone (especially the players) really losing anything or getting tied up in legal bullshit that could impact the gaming experience. [See less](#)



141

60

1

Like

Comment

View more comments

Dimitri Roux

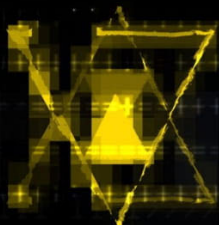
What doesn't kill us makes us stronger .

5y

1

Privacy · Consumer Health Privacy · Terms · Advertising · Ad

EXHIBIT B



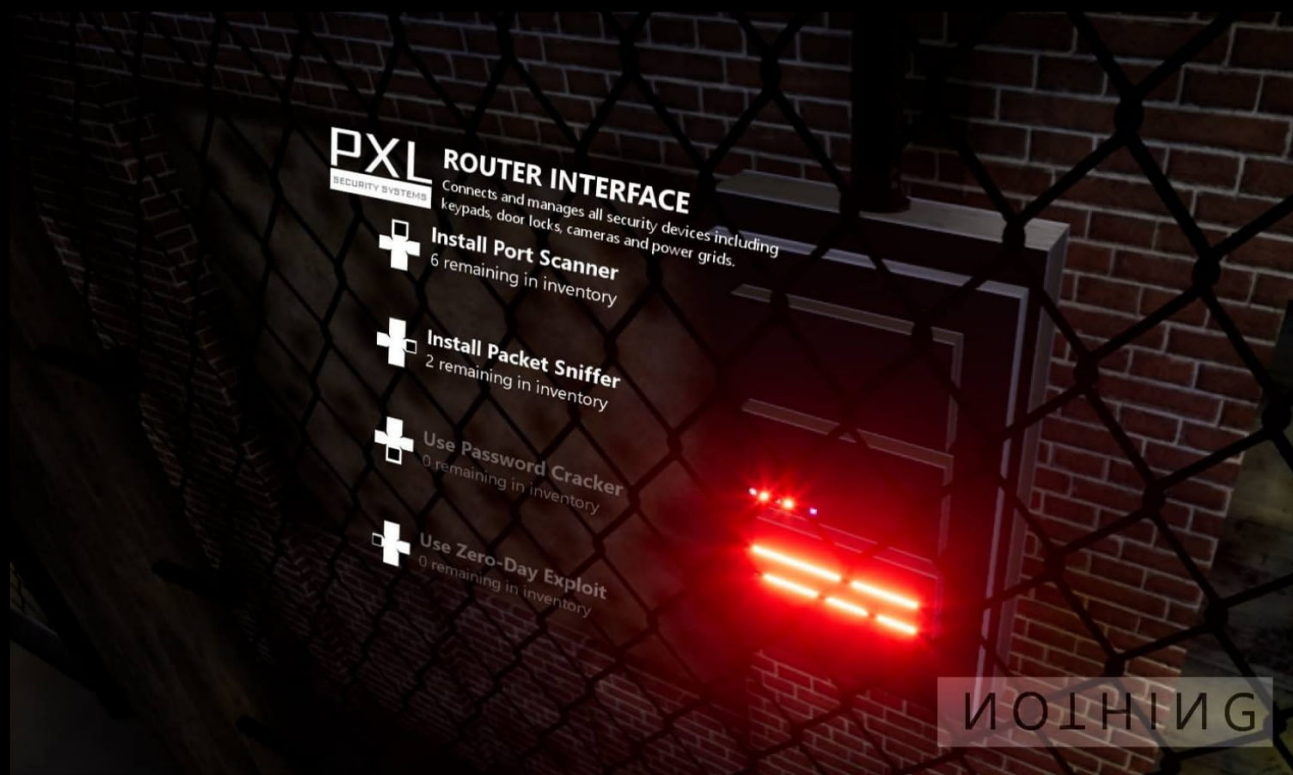
the making of

T H E N E X T W O R L D

EXHIBIT C

```
<trace[log]> The Making of {THE NEXT WORLD}:PAGE 18;</trace>
```

As I continued with the game, I knew I wanted hacking to be an element of it. I wanted to incorporate ideas where the hacking felt *real* or *as real as can be*. So I used concepts of real principals and tools in the design of the hacking mechanisms.



The idea was that hacking tools would be saved in inventory and used when needed -- Circa September 2017



"Hack Lines" show what devices the router connects to -- Circa September 2017

EXHIBIT D

Dresden v2.5



Our skin shaders improved greatly in a short amount of time, as did the general look and feel of our graphics and lighting. With every iteration we were getting closer and closer to a respectable product.



EXHIBIT E

ORIGINAL SOUNDTRACK SCORE
BY
RON WASSERMAN

Meeting Ron Wasserman and Getting Him On Board

Ron's wife at the time, Kathy Fisher was my favorite trance singer of all time. I found her on Facebook and said "I wonder if she's still making music". I friend requested her, told her I loved her music and then we never talked again.

I needed music for my game, badly. I had reached out to some artists we were close to like Grendel who did some music for the game, however, I needed a LOT of music. As I worked we came across a track by Tim Skold, ex-Marilyn Manson. I messaged him and we hit it off and talked for months I believe. We came up with an agreement where I'd pay him X per track and he'd do a full score. Then I made a monumental mistake – telling him I was interested in licensing his song 'The Devil You Know'. Unfortunately, I didn't realize that scenario might be far more lucrative and better for him financially and Skold simply didn't let go of this possibility no matter how much I tried to deflect and get it back on track for custom music. He then got Bicycle Music involved. That was the end of our relationship as Bicycle wanted \$100,000.00 per platform for use of that track. When I declined, the publisher of Bicycle and I had more than enough words with each other, severing Skold's willingness to work with me.

One of the many mistakes I made during this that I wish I could go back on. I was dumb and had no idea how any of this worked yet.

As I moved forward with Ron, he was finishing and sending a track a day and it was absolute gold.

Ron mentioned his wife is a voice actress and might be interested in a role. Are you kidding me? First the guy that soundtracked my entire childhood and now I get to work with my favorite trance singer ever?

God I love Los Angeles.

I cast her immediately as Eden. Production ramped up.



“I had too many people involved
to stop now. Even if I wanted to.”

EXHIBIT F

Getting Alexis Mincolla On Board

Sometime during the beginning of all of this madness in very early 2018, our friends Dino Cazares (Fear Factory) and his wife at the time Jennifer are out with a new up and coming band called 3TEETH. They invited us out, but there was no realistic way to make it in time. I don't recall the exact discussion at the time, but we had never heard of 3TEETH before and fell in love with their music, listening to it endlessly on loop while I worked on the game and I built my electric motorcycle.

As Dino and Jenn continued hanging out with 3TEETH, time and time again they were inviting us out, but we never made it. I messaged Lex one night about a year after discovering 3teeth saying something awkward along the lines of *"Hey, I'm friends with Jenn and Dino. They turned us onto your music and we love it. It's literally on loop while I work on my video game"*. After a brief conversation Lex replies with *"Do you have any spots in your game for someone who looks like me?"*

I mean, how wouldn't I??? I'm shocked, "No fucking way" I keep screaming as I literally fall down the stairs running as fast as I can to tell Britany what happened.

I finally figured out who my villain will be.

Again -- God, I love Los Angeles.

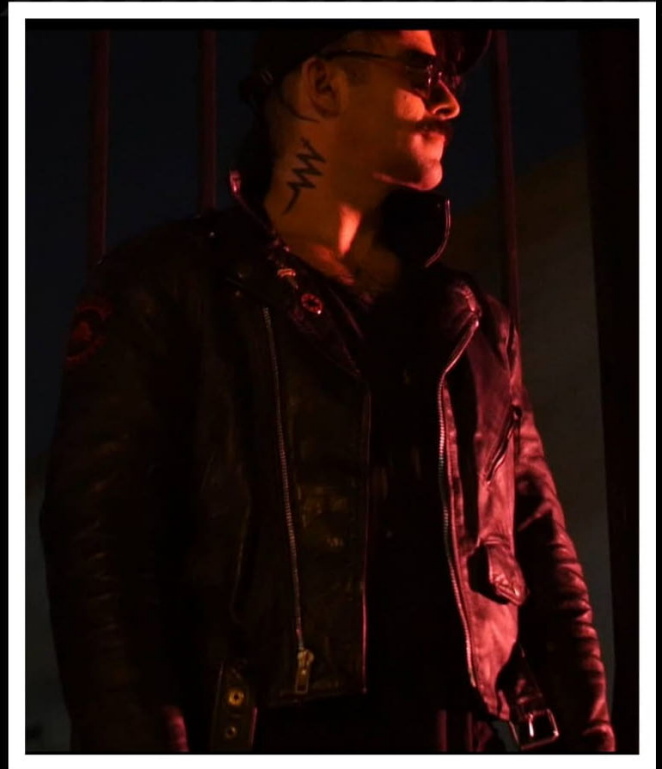


EXHIBIT G

Lodged Under Seal

EXHIBIT H

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A limited liability partnership formed in the State of Delaware

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9 Facsimile: +1 312.207 6400

10 *Attorneys for Defendant,*
Rokoko Electronics

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

14 MATTHEW R. WALSH

15 Plaintiff,

16 vs.

17 ROKOKO ELECTRONICS, and
DOES 1 through 50, inclusive,

18 Defendant.

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

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

19 **DEFENDANT ROKOKO**
20 **ELECTRONICS' THIRD SET OF**
21 **REQUESTS FOR PRODUCTION TO**
22 **PLAINTIFF MATTHEW R. WALSH**

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

26 PROPOUNDING PARTIES: Defendant ROKOKO ELECTRONICS

27 RESPONDING PARTIES: Plaintiff MATTHEW R. WALSH

28 SET: THREE (3)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Rokoko Electronics, by and through their attorneys, hereby requests that Plaintiff Matthew R. Walsh (“Plaintiff”) produce for inspection and copying the documents and things specified herein within thirty (30) days of the date of service, at the offices of Reed Smith LLP, located at 515 South Flower Street, Suite 4300, Los Angeles, California 90071.

DEFINITIONS

In responding to these Requests for Production of Documents (“Requests”), the following definitions will apply:

1. “You,” “Your,” or “Plaintiff” shall mean Plaintiff Matthew R. Walsh, including any employees, agents, individuals or entities acting on Your behalf.

2. “Rokoko” shall mean Defendant Rokoko Electronics, including any employees, directors, officers, agents, representatives, predecessors, successors, subsidiaries, individuals or entities acting on its behalf.

3. “March 8, 2026 Report” shall refer to the report submitted in connection with Plaintiff’s Motion for Partial Summary Judgment styled as “EXPERT REPORT and Testimony of Matthew R. Walsh,” dated March 8, 2026 (ECF NO. 167-2).

4. “Action” shall mean the above captioned lawsuit and all claims and defenses asserted therein.

5. “Document” or “Documents” shall mean all materials discoverable under Rules 26 and 34 of the Federal Rules of Civil Procedure, including without limitation “electronically stored information,” as that term is used in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

6. “Communication” or “Communications” shall mean any transmission or exchange of information, ideas, thought or sentiment between or among two or more Persons, orally or in writing, and include any conversation or discussion, whether face-

1 to-face or by means of a telephone, telegraph, telex, telecopier, facsimile transmission,
2 letter, e-mail, electronic or other medium.

3 7. "Person" or "Persons" shall mean, without limitation, any natural person,
4 company, firm, syndicate, sole proprietorship, partnership, corporation, limited liability
5 company, limited liability partnership, joint venture, association, trust, financial
6 institution, governmental body or agency, and all past and present officers, directors,
7 employees, partners, members, agents, and representatives, along with all other Persons
8 acting or purporting to act on such Person's behalf.

9 8. "Relating to," "Relate(s)," or "Related to," as used herein, shall mean
10 constituting, comprising, consisting of, setting forth, describing, discussing, citing,
11 regarding, pertaining to, mentioning, proposing, showing, disclosing, containing,
12 analyzing, explaining, summarizing, supporting, evidencing, authorizing, concerning,
13 embodying, reflecting, identifying, incorporating, considering, recommending,
14 continuing, enumerating, dealing with, commenting on, referring to directly or
15 indirectly, dealing with, or in any way pertaining to, in whole or in part.

16 9. Terms in the singular shall be deemed to include the plural and terms in
17 the plural shall be deemed to include the singular.

18 10. The Definitions contained herein shall apply without regard to
19 capitalization of defined words.

20 INSTRUCTIONS

21 1. If any Document called for by these Requests is withheld under a claim of
22 privilege, furnish a list at the time the Document is withheld setting forth the following
23 for each Document for which privilege is claimed: (a) the nature of the privilege
24 asserted; (b) the type of Document; (c) the general subject matter of the Document; (d)
25 the date of the Document; (e) the author of the Document; (f) all addressee(s) and
26 distributee(s); (g) all other Persons who have seen the Document or been informed of
27
28

1 its contents; and (h) such other information as is sufficient to identify the Document for
2 a subpoena duces tecum.

3 2. The Documents produced in response to these Requests shall be produced
4 as they are kept in the ordinary course of business and shall be organized so that Rokoko
5 can ascertain the files in which they were located, their relative order in such files, and
6 how such files were maintained.

7 3. Documents are to be produced in full and unexpurgated form without
8 abbreviation or redaction.

9 4. These Requests shall be deemed continuing to the fullest extent permitted
10 by Rule 26(e) of the Federal Rules of Civil Procedure, so that Plaintiff is required to
11 make a further and supplemental production if Plaintiff obtains additional responsive
12 Documents between the time of initial production and the time of trial.

13 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

14 **REQUEST FOR PRODUCTION NO. 93:**

15 All Documents submitted by You to the U.S. Copyright Office in connection with
16 Your application for copyright registration number Pau 4-279-489, including but not
17 limited to the deposit copy of Your work.

18 **REQUEST FOR PRODUCTION NO. 94:**

19 All Documents that you relied on in preparing Your March 8, 2026 Report.

20 **REQUEST FOR PRODUCTION NO. 95:**

21 All Communications with, or information received from, third parties that you
22 relied on in preparing and/or forming Your opinions in Your March 8, 2026 Report.

23 **REQUEST FOR PRODUCTION NO. 96:**

24 All Documents that You created in preparing Your March 8, 2026 Report,
25 including but not limited to work papers, scripts, workbooks, programming, etc.

26 **REQUEST FOR PRODUCTION NO. 97:**

27 All Documents that You relied on in support of Your Second Amended
28 Complaint (ECF No. 172).

1 **REQUEST FOR PRODUCTION NO. 98:**

2 All Documents You intend to rely on to demonstrate that You are qualified to
3 testify as an expert witness in this Action.

4 **REQUEST FOR PRODUCTION NO. 99:**

5 All Communications with third parties concerning the opinions in Your March 8,
6 2026 Report.

7 **REQUEST FOR PRODUCTION NO. 100:**

8 All Documents relating to discussions with third parties concerning the opinions
9 in Your March 8, 2026 Report.

10 **REQUEST FOR PRODUCTION NO. 101:**

11 Any other Documents, Communications, or information relied upon by You in
12 forming the opinions to the extent not disclosed in Your March 8, 2026 Report.

13
14 DATED: April 22, 2026

REED SMITH LLP

15 By /s/ Katherine Ellena

16 Katherine Ellena

17 Michael Galibois (*pro hac vice*)

18 Emily Graue (*pro hac vice*)

19 *Attorney for Defendant*

20 *Rokoko Electronics*

CERTIFICATE OF SERVICE

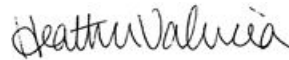
I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On April 22, 2026, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' THIRD SET OF
REQUESTS FOR PRODUCTION TO PLAINTIFF MATTHEW R. WALSH**

☒ 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 April 22, 2026 at Los Angeles, California.



Heather Valencia

EXHIBIT I

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Plaintiff objects to this Request on the grounds that it seeks documents that are equally available to Defendant from a third-party source, namely the U.S. Copyright Office, and therefore imposes an unnecessary and duplicative burden. Plaintiff further objects to the extent the Request seeks materials beyond those required under Federal Rule of Civil Procedure 26.

Subject to and without waiving these objections, Plaintiff states that the materials submitted in connection with the referenced copyright registration are publicly available through the U.S. Copyright Office and/or have already been disclosed or identified in prior productions. Plaintiff will not produce duplicative materials already in Defendant's possession, custody, or control or otherwise equally accessible to Defendant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Plaintiff objects to this Request to the extent it seeks documents beyond those actually relied upon in forming the opinions expressed in the March 8, 2026 Report, including materials not forming the basis of any opinion.

Subject to and without waiving these objections, Plaintiff states that, to the extent such materials exist, all materials actually relied upon in preparing the March 8, 2026 Report have already been produced in discovery and are expressly identified within the Report by Bates reference. Plaintiff did not rely on any undisclosed documents in forming the opinions set forth in the Report. Plaintiff will not produce duplicative materials already produced.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Plaintiff objects to this Request to the extent it seeks communications not relevant to the opinions expressed in the March 8, 2026 Report or not actually relied upon in forming those opinions.

Subject to and without waiving these objections, Plaintiff states that the opinions set forth in the March 8, 2026 Report are based solely on Plaintiff's own technical analysis of systems, software, logs, and data. Plaintiff did not rely on communications with any third parties in forming the opinions expressed in the Report and is not aware of any responsive communications.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Plaintiff objects to this Request on the grounds that it seeks materials protected from disclosure, including draft expert materials, internal analyses, and documents reflecting Plaintiff's mental impressions and litigation strategy developed in anticipation of this action.

Plaintiff further objects that the Request is overbroad because it is not limited to materials actually relied upon in forming the opinions expressed in the March 8, 2026 Report, and instead seeks all documents "created" in connection with its

preparation, including materials that do not form the basis of any opinion.

Subject to and without waiving these objections, Plaintiff states that all materials actually relied upon in forming the opinions expressed in the March 8, 2026 Report have already been produced in discovery and identified by Bates reference. Plaintiff will not produce draft materials, internal work product, or documents not relied upon in forming the opinions set forth in the Report.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Plaintiff objects to this Request on the grounds that it is overbroad and not proportional to the needs of the case. The Request is not limited to any specific claim, defense, or issue in dispute and instead seeks "all Documents" allegedly relied upon in support of the entire Second Amended Complaint, which encompasses multiple causes of action, time periods, and categories of allegations.

Plaintiff further objects that the phrase "relied on in support of" is vague in the context of a pleading, as it is not limited to materials forming the basis of any specific allegation and could be construed to include any document reviewed, considered, or related in any way to the claims.

Plaintiff further objects to the extent the Request seeks materials not actually relied upon, as well as materials already produced in discovery, rendering the Request duplicative.

Subject to and without waiving these objections, Plaintiff states that documents supporting the allegations in the Second Amended Complaint have already been produced in discovery to the extent required under the Federal Rules. Plaintiff will not produce duplicative materials or documents beyond those relevant and proportional to the claims and defenses at issue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Plaintiff objects to this Request to the extent it seeks documents beyond those that Plaintiff presently intends to rely upon to demonstrate his qualifications, including materials not relevant to his education, experience, or expertise.

Subject to and without waiving these objections, Plaintiff states that his qualifications are set forth in detail in the March 8, 2026 Report, including his professional background, experience, and prior work. To the extent Plaintiff intends to rely on documents to demonstrate his qualifications, such documents consist of materials reflecting his professional experience, prior work, and involvement in technical and forensic analysis, which have been disclosed and will be produced to the extent required under the Federal Rules.

Plaintiff will not produce duplicative materials already in Defendant's possession, custody, or control.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Plaintiff objects to this Request to the extent it seeks communications not relevant to the opinions expressed in the March 8, 2026 Report or not actually relied upon in forming those opinions.

Subject to and without waiving these objections, Plaintiff states that the opinions set forth in the March 8, 2026 Report are based solely on Plaintiff's own technical analysis of systems, software, logs, and data. Plaintiff did not rely on communications with any third parties in forming the opinions expressed in the Report and is not aware of any responsive communications.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Plaintiff objects to this Request on the grounds that it is overbroad and not proportional to the needs of the case. The Request seeks "all Documents relating to discussions with third parties," and, in light of Defendant's expansive definition of "Documents," encompasses any materials that merely reference or are tangentially connected to unspecified "discussions," without limitation to materials actually relied upon in forming any opinion in the March 8, 2026 Report.

Plaintiff further objects to the extent the Request seeks materials not relevant to any claim, defense, or specific opinion, or materials not actually relied upon in forming the opinions expressed in the Report.

Subject to and without waiving these objections, Plaintiff states that the opinions set forth in the March 8, 2026 Report are based solely on Plaintiff's own technical analysis of systems, software, logs, and data. Plaintiff did not rely on discussions with third parties in forming those opinions and is not aware of any responsive documents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Plaintiff objects to this Request to the extent it assumes the existence of additional documents, communications, or information relied upon that have not been disclosed, which is not the case.

Subject to and without waiving these objections, Plaintiff states that all materials relied upon in forming the opinions expressed in the March 8, 2026 Report have already been produced in discovery and are identified within the Report by Bates reference. Plaintiff did not rely on any undisclosed documents, communications, or information in forming the opinions set forth in the Report. Accordingly, Plaintiff is not aware of any responsive materials.

EXHIBIT J

Graue, Emily H.

From: Gorospe, Valentino
Sent: Thursday, June 11, 2026 1:42 PM
To: 'matthew@winteryear.com'
Cc: Galibois, Michael B.; Ellena, Katherine J.; Graue, Emily H.
Subject: June 11 Meet and Confer

Hi Mr. Walsh,

This email will act as a memorialization of our June 11 meet and confer regarding Rokoko's RFP Set 3.

You will stand on your objections to RFP Nos. 93, 94, and 96. Rokoko will move to compel.

You affirmed your expert report was completed without third-party assistance; as such, your obligations under RFP Nos. 95, 99, and 100 are satisfied.

You stated you would supplement RFP No. 98 with materials you intend to rely upon to demonstrate your qualifications to testify as a witness in this action.

Best,
Valentino

Gerardo Valentino Gorospe IV
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He/Him/His

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