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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; Hon. Rozella A. Oliver,
Courtroom 590]*

**DECLARATION OF RICARDO
TOBON IN SUPPORT OF
DEFENDANT ROKOKO
ELECTRONICS' MOTION FOR
SUMMARY JUDGMENT**

*[Concurrently Filed With Motion for
Summary Judgment; Separate Statement
of Uncontroverted Facts; Declaration of
Jakob Balslev; Declaration of Mikkel
Overby; Declaration of Gerardo V.
Gorospe; Compendium of Evidence;
Application to File Under Seal;
Declaration of Gerardo V. Gorospe ISO
App. to Seal; [Proposed] Order]*

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

Hearing Date: September 28, 2026
Time: 1:30 p.m.
Place: Courtroom 5D

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DECLARATION OF RICARDO TOBON

I, Ricardo Tobon, declare:

1. I have been retained by Reed Smith LLP on behalf of its client, Defendant Rokoko Electronics (“Rokoko”), as an expert in the field of motion capture and animation for video games in connection with the above-captioned action. 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 for Summary Judgment brought against Plaintiff Matthew R. Walsh (“Plaintiff,” and together with Rokoko, the “Parties”).

3. On July 2, 2026, I prepared and signed my Expert Report in this action, which was served on Plaintiff that same day. Attached hereto as **Exhibit A** is a true and correct copy of my Expert Report, dated July 2, 2026, including Exhibit A thereto (my curriculum vitae).

4. The opinions set forth in my Expert Report are my own and were prepared by me. They are based on my review of the materials identified in the report, my education and training, and my professional experience in motion capture and animation, and they are stated to a reasonable degree of professional certainty. The report also sets forth my compensation and the other disclosures required by Federal Rule of Civil Procedure 26(a)(2)(B).

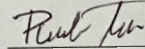
5. As part of my analysis of the motion capture data files in Rokoko’s possession generated by Plaintiff’s use of the cloud-style version of Rokoko Studio (the “MoCap Data”), I was provided with those files in a format exportable as “.fbx” so that they could be reviewed in third-party software such as MotionBuilder, Maya, or Blender. Because those native files cannot be viewed without such specialized software, I converted the MoCap Data files provided to me into “.mp4” video files so that they could be reviewed by the Court and submitted as exhibits. I performed the conversion myself using standard, commercially available software, and the conversion

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1 did not alter, edit, enhance, or otherwise modify the underlying motion data in any way;
2 it renders the same motion data in a viewable video format. Attached hereto as **Exhibit**
3 **B** is a .zip file containing true and correct copies of those “.mp4” files, each of which
4 fairly and accurately depicts the corresponding MoCap Data files I reviewed in
5 connection with my Expert Report.

6 6. The .fbx files I reviewed in connection with my report were produced to
7 Plaintiff as TOBON_0000001 through TOBON_0000047. The file names of the .mp4
8 files that comprise Exhibit B have been edited to correspond with the .fbx files produced
9 to Plaintiff.

10
11 I declare under penalty of perjury under the laws of the United States of America
12 that the foregoing is true and correct. Executed on this 23 day of August 2026, in
13 Los Angeles, California.

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