

**ORIGINAL**

FILED

2025 JUN 17 PM 2:03

CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT 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

**PLAINTIFF'S EX PARTE APPLICATION  
FOR TEMPORARY RESTRAINING  
ORDER AND MOTION TO STAY  
PROCEEDINGS PENDING  
JURISDICTIONAL DETERMINATION**

19 **PLAINTIFF'S EX PARTE APPLICATION FOR**  
20 **TEMPORARY RESTRAINING ORDER AND NOTICE OF MOTION AND**  
21 **MOTION TO STAY PROCEEDINGS PENDING JURISDICTIONAL**  
22 **DETERMINATION**

23 TO THE HONORABLE COURT:

24 Plaintiff, MATTHEW R. WALSH, hereby applies ex-parte for a Temporary  
25 Restraining Order and requests that this Court stay all proceedings in the above-captioned  
26 matter until the Court rules on Plaintiff's pending Motion to Remand.  
27  
28

1 This application is made pursuant to Rule 65 of the Federal Rules of Civil  
2 Procedure and the inherent powers of this Court to manage its docket and prevent  
3 irreparable harm to parties.  
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5  
6 Plaintiff respectfully seeks this stay to prevent Defendant from manipulating  
7 Federal Rule 12 timelines while simultaneously declining to address the core  
8 jurisdictional issue raised in Plaintiff's Motion to Remand. Plaintiff welcomes any  
9 opposition to this application, as Defendant's position on jurisdiction remains notably  
10 absent from the record as that they have not opposed to Plaintiff's motion to remand.  
11

12  
13 To date, Defendant has never once filed a responsive pleading, opposition, or  
14 substantive reply to any of Plaintiff's claims or motions — not in small claims,  
15 arbitration, or this civil action. This is not inadvertent; it is a pattern. Defendant's counsel  
16 is experienced, sophisticated, and fully capable of filing an opposition if it intended to.  
17 Silence, here, is not neutrality — it is strategic.  
18

19  
20 **RELIEF REQUESTED:**  
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- 22  
23 1. A Temporary Restraining Order enjoining Defendant ROKOKO ELECTRONICS  
24 from filing any further motions or pleadings in this matter, including but not limited  
25 to motions to dismiss or for extensions of time, until the Court issues a ruling on  
26 Plaintiff's Motion to Remand.  
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1           2. An Order staying all deadlines and proceedings in this action pending determination  
2           of jurisdiction.  
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5           **GROUND FOR RELIEF:**

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7           3. This Court at this present time lacks subject matter jurisdiction. Plaintiff's Motion to  
8           Remand challenges the propriety of Defendant's removal under 28 U.S.C. §1447.  
9

10           4. Despite having notice since June 12, Defendant has neither opposed the Motion to  
11           Remand nor engaged in any meaningful jurisdictional argument before this Court —  
12           suggesting either a concession or an intentional delay tactic while other deadlines  
13           lapse.  
14

15           5. Defendant has instead filed an Ex Parte Application for Enlargement of Time to  
16           Respond to the Complaint, attempting to engage the merits while jurisdiction is still  
17           in dispute.  
18

19           6. Defendant is in procedural default in state Court, was propounded with discovery  
20           requests, had generally appeared and failed to oppose that declaration and is facing an  
21           imminent motion for summary judgment in lieu of Default. Those timelines are being  
22           manipulated and extinguished by their improper removal to this Court.  
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1 7. Plaintiff will suffer irreparable harm if this Court allows Defendant to continue  
2 litigating and tolling deadlines in an improperly removed action.

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5 8. The balance of equities favors preserving the status quo until jurisdiction is resolved.

6  
7 **NOTICE TO DEFENDANT:**

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9 Pursuant to Local Rule 7-19.1, Plaintiff notified Defendant's counsel (Reed Smith LLP)  
10 of this application via email on June 16, 2025. Defendant's counsel has not stipulated to the  
11 requested relief.  
12

13  
14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15  
16 Filed concurrently herewith.

17  
18  
19 **CONCLUSION:**

20 For these reasons and the ones outlined in Plaintiff's motions and forthcoming  
21 replies, Plaintiff respectfully requests that this Court issue a Temporary Restraining Order  
22 and stay all proceedings until the pending jurisdictional dispute is resolved —  
23 specifically, that this case be remanded to state court, where Plaintiff may finally pursue  
24 the imminent relief to which he is entitled.  
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1 Respectfully submitted,

2 DATED: June 16, 2025

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MATTHEW R. WALSH

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Plaintiff In Pro Per

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**PROOF OF SERVICE**

I, Matthew R. Walsh, declare:

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

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

**PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND MOTION TO STAY PROCEEDINGS PENDING JURISDICTIONAL DETERMINATION**

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

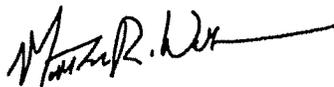
**Reed Smith LLP (Counsel for Defendant)**  
Heather Valencia, Esq.  
[Hvalencia@reedsmith.com](mailto:Hvalencia@reedsmith.com)

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

**Reed Smith LLP (Counsel for Defendant)**  
Heather Valencia, Esq.  
515 South Flower Street, Suite 4300  
Los Angeles, CA 90071

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

Executed on June 17, 2025  
Santa Clarita, California



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Matthew R. Walsh  
Plaintiff In Pro Per