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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 X

**PLAINTIFF'S NOTICE OF
WITHDRAWAL OF EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER;
NOTICE OF AND MOTION TO STAY
MOTION TO REMAND;
AND PROCEDURAL BRIEF IN
SUPPORT OF
PLAINTIFF'S MOTION TO STRIKE
REMOVAL**

19 **PLAINTIFF'S NOTICE OF WITHDRAWAL OF EX PARTE APPLICATION FOR**
20 **TEMPORARY RESTRAINING ORDER;**
21 **NOTICE OF AND MOTION TO STAY MOTION TO REMAND;**
22 **AND PROCEDURAL BRIEF IN SUPPORT OF**
23 **PLAINTIFF'S MOTION TO STRIKE REMOVAL**

24 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

25 Plaintiff Matthew R. Walsh respectfully submits this Notice of Withdrawal, Motion to
26 Stay, and Procedural Brief, and states as follows:
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1. **NOTICE OF WITHDRAWAL OF EX-PARTE APPLICATION**

Plaintiff hereby withdraws his Ex Parte Application for Temporary Restraining Order and Motion to Stay Proceedings filed on or about June, 17, 2025. Plaintiff now realizes the ex-parte TRO is no longer necessary due to new developments and the surfacing of additional procedural irregularities in Defendant’s removal, Plaintiff believes that a more appropriate and efficient course of action is now before the Court: **striking the entire removal.**

2. **MOTION TO STAY MOTION TO REMAND**

Plaintiff further requests that the Court stay briefing and consideration of Plaintiff’s pending Motion to Remand, filed on June 13, 2025. Plaintiff submits that the issues raised in the subsequently filed “**MOTION TO STRIKE DEFENDANT’S NOTICE OF REMOVAL AND ALL SUBSEQUENT FILINGS – IN LIEU OF MOTION TO REMAND**” are more immediately dispositive and will provide the Court with a cleaner procedural pathway to resolution and will offer far less prejudice to Plaintiff.

These facts were not available to Plaintiff previously and so he humbly requests a stay of the motion to remand.

1 3. **PROCEDURAL BRIEF IN SUPPORT OF MOTION TO STRIKE REMOVAL**

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4 Plaintiff has now filed a **MOTION TO STRIKE DEFENDANT’S NOTICE OF**
5 **REMOVAL AND ALL SUBSEQUENT FILINGS – IN LIEU OF MOTION TO**
6 **REMAND**, on the grounds that removal was:

- 7
8 a. **Procedurally improper**, as the original removal filing was signed and
9 submitted by attorneys not admitted to practice before this Court at the time of
10 filing; and
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12 b. **Jurisdictionally defective**, given that Defendant Rokoko Electronics’ U.S.
13 operations are based in California, with its corporate base in San Francisco by
14 non-American citizens (Danish citizens) with omitted an LLC to the same
15 name. For these reasons and others: rendering diversity removal unavailable
16 under 28 U.S.C. § 1332.
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18 c. The individual foreign defendants referenced in the state Complaint are
19 Danish nationals, and thus not proper parties for purposes of diversity
20 removal. Their inclusion further bars federal subject-matter jurisdiction.
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25 4. Because the Motion to Strike raises threshold defects with the removal itself —
26 independent of the factual matters addressed in the Motion to Remand—Plaintiff
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1 believes that judicial economy is best served by allowing the Motion to Strike to be
2 heard first.

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5 **5. CONCLUSION**

6 Plaintiff respectfully requests:

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8 **a.** That the Court acknowledge withdrawal of the pending Ex Parte Application
9 for TRO;

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12 **b.** That the Court issue an order staying Plaintiff's Motion to Remand;

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14 **c.** That the Court allow **PLAINTIFF'S NOTICE OF MOTION AND**
15 **MOTION TO STRIKE DEFENDANT'S NOTICE OF REMOVAL AND**
16 **ALL SUBSEQUENT FILINGS – IN LIEU OF MOTION TO REMAND**
17 to be heard and resolved as the primary procedural challenge at it's earliest
18 convenience.
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21 Executed this 19th day of June, 2025, in Santa Clarita, California.

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26 Matthew R. Walsh
27 Plaintiff In Pro Per
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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 19, 2025, I served the following document(s):

6 **PLAINTIFF’S NOTICE OF WITHDRAWAL OF EX PARTE APPLICATION FOR**
7 **TEMPORARY RESTRAINING ORDER;**
8 **NOTICE OF AND MOTION TO STAY MOTION TO REMAND;**
9 **AND PROCEDURAL BRIEF IN SUPPORT OF**
10 **PLAINTIFF’S MOTION TO STRIKE REMOVAL**

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

12 **Reed Smith LLP (Counsel for Defendant)**
13 Heather Valencia, Esq.
14 Hvalencia@reedsmith.com

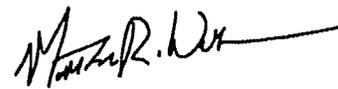
15 By placing a true and correct copy in a sealed envelope, with first-class postage fully prepaid,
16 and depositing it in the United States Mail at Santa Clarita, California, addressed as follows:

17 **Reed Smith LLP (Counsel for Defendant)**
18 Heather Valencia, Esq.
19 515 South Flower Street, Suite 4300
20 Los Angeles, CA 90071

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

Executed on June 19, 2025

Santa Clarita, California



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24
25 Matthew R. Walsh
26 Plaintiff In Pro Per
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