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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. 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-5340 - ODW - RAOX

**PLAINTIFF'S NOTICE OF MOTION  
AND MOTION TO STRIKE  
DEFENDANT'S NOTICE OF REMOVAL  
AND ALL SUBSEQUENT FILINGS - IN  
LIEU OF MOTION TO REMAND**

**PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE**

**DEFENDANT'S NOTICE OF REMOVAL AND ALL SUBSEQUENT FILINGS -**

**IN LIEU OF MOTION TO REMAND**

23 **I. INTRODUCTION**

24 Plaintiff respectfully moves to strike the Notice of Removal filed by Defendant, along  
25 with all subsequent federal filings, on the grounds that:  
26

1 a. Defendant’s removal was entirely improper under 28 U.S.C. § 1446(d) as it was  
2 based on false statements, made intentionally under penalty of perjury about  
3 corporate citizenship;

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5  
6 b. Defendant’s attorneys were not properly licensed or authorized to appear in this  
7 Court and even after being removed from the docket, continued the unauthorized  
8 practice of law;

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10  
11 c. Defendant has used the removal process in bad faith to delay adjudication in state  
12 court and avoid a pending motion for summary judgment to which they have not  
13 opposed;

14  
15 d. These actions constitute fraud on the court and violate Federal Rule of Civil  
16 Procedure 11.  
17

18  
19 Because this Court lacks subject-matter jurisdiction and removal was fundamentally  
20 improper, Plaintiff respectfully asks the Court to strike the removal, strike all filings,  
21 remand the case, and issue appropriate sanctions.  
22

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24 **II. BACKGROUND**  
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1 a. Defendant was served the Complaint on or about April 17, 2025 and again on or  
2 about May 4, 2025 and then again on or about May 14<sup>th</sup>, 2025.

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4  
5 b. Plaintiff filed a declaration of general appearance and numerous documents in  
6 state Court where Defendant ignored them and offered no response or opposition,  
7 even in Federal court until on or about June, 17, 2025

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10 c. **REMOVAL APPLICATION IS VOID AB INITIO**

11 Defendant removed this case on the 30th day after service by an attorney not  
12 licensed to practice law in the State of California, Michael Galibois; an Illinois  
13 attorney with no pro hac vice status (Exhibit Y).

14  
15 d. Michael was not even added as a party to the case, yet his name appears solo in  
16 the removal filing (Exhibit ZA)

17  
18  
19 e. Michael Galibois' name, and only his name is listed under Attorneys on the  
20 removal application (Exhibit Y). As 2090-1(b) States: "*A court order is needed*  
21 *before the nonresident attorney is authorized to file any papers or appear at a*  
22 *court hearing on behalf of a client.*". No such order existed, and Michael had not  
23 applied yet filed for removal improperly and gained that removal illegally.  
24  
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27



1 (1989)) (taken from U.S. Court – Central District Website)

2  
3 g. This is textbook misrepresentation and Michael, nor his name is  
4 unauthorized to appear at all under L.R. 83-2.1.1 and L.R. 83-2.1.4.  
5

6  
7 h. The court or clerk, respectfully, at their own discretion may wish to  
8 inspect the CM/ECF entries and inspect the IP addresses which are performing  
9 submissions. Any discrepancies would indicate the unauthorized practice of law  
10 and access to government filing systems are traceable to out of state attorney’s.  
11

12  
13 i. Signing, authoring, filing or contacting clients as counsel is **not allowed**,  
14 even if signed by a local attorney as those powers are a nondelegable  
15 responsibility (P & L v. Marvel Entertainment | 493 U.S. 120 (1989)) which  
16 found: *“the purpose of Rule 11 as a whole is to bring home to the individual*  
17 *signer his personal, nondelegable responsibility. It is at least arguable that these*  
18 *purposes are better served by a provision which makes clear that, just as the*  
19 *court expects the signer personally -- and not some nameless person within his*  
20 *law firm -- to validate the truth and legal reasonableness of the papers filed”*  
21  
22

23  
24 j. **THE ENTIRETY OF PURPOSE FOR REMOVAL IS MANUFACTURED**

25 Defendant’s primary precursor for removal was that it was a foreign corporation  
26 headquartered outside California, and that diversity jurisdiction applied.  
27

1 Defendant knew this to be false.

2  
3 **k. FRAUDULENT STATEMENTS AND ACTIONS TO THIS COURT WERE**  
4 **MADE AS A LAST-DITCH EFFORT TO SECURE A REMOVAL**

5 Defendant made this statement under penalty of perjury:

6  
7  
8 *“Rokoko’s principal place of business is located at Sankt Gertruds Stræde 10,*  
9 *1129 København, Denmark, from where Rokoko’s senior executives direct,*  
10 *control, and coordinate the company’s primary business activities on a day-to-*  
11 *day basis”*

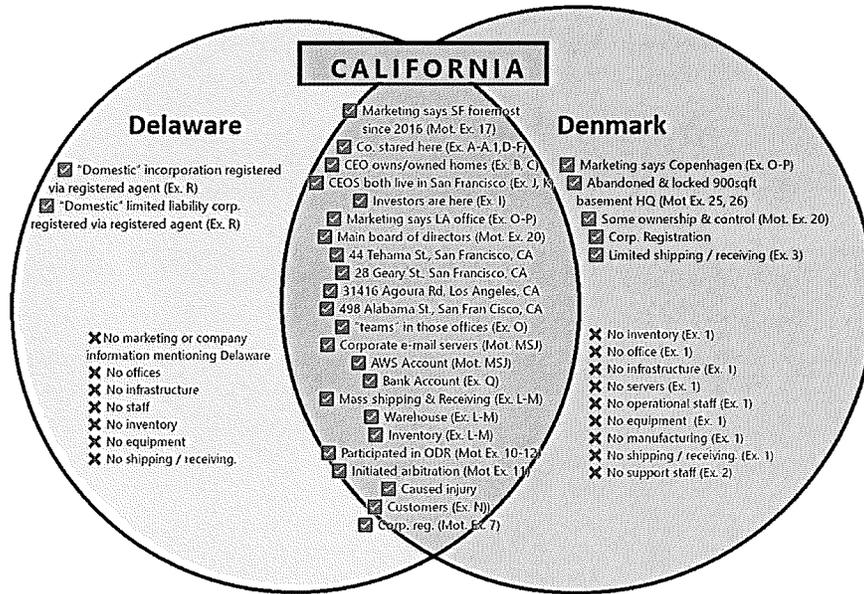
12  
13  
14 *“At no point prior to filing or at the time of filing was Rokoko a citizen of*  
15 *California. Rokoko has only ever been a Delaware corporation with a principal*  
16 *place of business in Denmark.*

17  
18  
19 *I declare under penalty of perjury under the laws of the State of California and*  
20 *the United States that the foregoing is true and correct.”*

21  
22 Defendant knew this statement to always be false.

23  
24  
25 **I. Plaintiff has provided documented evidence that:**

i. The individuals who authored, signed and filed Federal pleadings on behalf of Defendant were not admitted in the Central District of California and had no legal right to appear and those documents are void ab initio (Exhibits T-ZA)



ii.

The removing entity ("Rokoko Electronics") is in fact a California citizen, with it's principal place of business in California and meets the nerve test under Hertz v Friend (see diagram under Exhibit S);

iii. **DEFENDANTS ARE NOT CITIZENS OF THE USA, THEY ARE ALL OF DANISH CITIZENSHIP**

More fatally, as Defense Counsel has always known, **all of the named** individual defendants are of non-citizen immigration Danish national status. Under clear Supreme Court precedent, a natural person must be

1 both a U.S. citizen *and* domiciled in a U.S. state to qualify for diversity  
2 jurisdiction. “[I]n order to be a citizen of a State within the meaning of the  
3 diversity statute, a natural person must **both** be a citizen of the United  
4 States **and** be domiciled within the State.” — Newman-Green, Inc. v.  
5 Alfonso-Larrain, 490 U.S. 826, 828 (1989).  
6

7  
8 *iv.* They are neither. None of the named Defendants have U.S. citizenship:  
9 Mikkell Overby lives in, and has only ever lived in Denmark and is a  
10 Danish citizen and Jakob Balslev and Matias Sondergaard are both Danish  
11 citizens as well, not American. Diversity jurisdiction is dead on arrival.  
12

13  
14 *v.* **THE COMPANY WAS FOUNDED AND ESTABLISHED HERE**

15 Its principal place of business (“nerve center”) is and always was San  
16 Francisco, California; (Exhibit S, J, K, L-M, N, Q)  
17

18  
19 *vi.* Defendant’s Company was founded here (Exhibit A-A.1, D-F)  
20

21 *vii.* **DEFENDANTS INVESTORS INVESTED HERE**

22 Defendant received investments (\$92M from Naver Z in Los Angeles)  
23 (Exhibit I) for stake in ownership, and prize money (Exhibit G) at local  
24 events from investors and companies which are California based while  
25 being domiciled here.  
26  
27

1 **viii. DEFENDANTS DOMICILE IS ESTABLISHED HERE**

2 It's owners, founders, board members and operators live and resided in  
3 San Francisco, California; owned homes; raised families and had bank  
4 accounts. (Exhibit B, C, J, K, Q)  
5

6  
7 **ix.** Defendant's CEO is listed on the California business registration, at the  
8 apartment he moved from at 4140 Cesar Chavez St. Apt 54, San  
9 Francisco, CA 94131 (Exhibit NO)  
10

11  
12 **x.** Defendant banks in California, with a Corporate account at Silicon Valley  
13 Bank (Exhibit Q) which was only 4.2m from his apartment (Exhibit NP)  
14

15 **xi.** Defendant's core customer base is located in California (Exhibit N)  
16

17  
18 **xii.** Defendant made express admissions which attest that the nerve center is  
19 San Francisco, California (Exhibits F, L-L.1, O): "*We're in San Francisco*  
20 *and just established our US subsidiary company with our new and very*  
21 *tall US lawyer David Raynor. It is VERY exciting! More updates from San*  
22 *Fran coming up*" -- with Matias Søndergaard and Jakob Balslev. (Exhibit  
23 F)  
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26 **xiii. DEFENDANT LIED TO THE DANISH GOVT. TO SECURE**

27 **DENMARK-ONLY FUNDING WHILE DOMICILED IN USA**

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On or about 2019, Defendant’s nerve center remained in San Francisco, where operations, executive control, and decision-making were based. Nevertheless, Defendant misrepresented this fact to the Danish government investment fund Vækstfonden (Exhibit ZC, ZE), falsely portraying Denmark as the company’s principal hub in order to secure a DKK 19 million (~\$2.93 million USD) capital investment.

xiv. Once the investment round was completed, Defendant stuck a small “ROKOKO” sticker to the abandoned and gate-secured basement cellar he had rented as early as 2016 in which he calls his “Copenhagen HQ” (ZF). The same basement Defendant, Mikkel Overby, accused of making false statements to this Court stated to Plaintiff in writing – is not their office: *“we do have offices (and the Copenhagen office is not in a basement)”*

xv. **DEFENDANT MANUFACTURED INVESTORS TO TRICK AMERICAN AND GOVERNMENT INVESTORS**

Defendant did this while domiciled in, and under corporate citizenship of San Francisco while he acted as a foreign competing third-party investor (he named North-East Ventures (Exhibit ZD, ZG, ZE)) to incite both the Danish Government and Los Angeles-based (and intended DOE) Naver Z (who invested \$92,000,000), respectively (Exhibit ZE, ZG).

*“We were profitable the entirety of last year so didn’t have too much*

1                    *pressure on our back to raise a large round.” ... “We raised \$3m as it*  
2                    *was primarily a strategic round to bring Naver Z in, and then some of*  
3                    *our previous investors wanted to follow up too,” - Jonathan Jeffery,*  
4                    director of growth at Rokoko  
5

6  
7                    **xvi.** Defendant’s other company (intended DOE) North-East Venture (Exhibit  
8                    ZD, ZG, ZE)) was used to take money from Defendant Rokoko  
9                    Electronics, place it into North-East Venture while pretending to be a  
10                    third-party investor, and then invest that money back into Defendant  
11                    Rokoko Electronics. Plaintiff already alleged Alter-Ego in the Complaint  
12                    and MSJ.  
13

14  
15                    **xvii. DEFENDANTS AND COUNSEL OMITTED MATERIAL FACTS**

16                    Defendant purposely omitted key information to the Court that would  
17                    definitively destroy diversity of citizenship:  
18

- 19  
20                    1. Defendant has a Delaware LLC of the same name, which makes  
21                    the removing entity a citizen of every state. (Exhibit R)  
22

23                    *“Corporations are citizens of both their state of incorporation and*  
24                    *the state in which they have their principal place of business.” 28*  
25                    *U.S.C. § 1332(c)(1); see also New Alaska Dev. Corp. v.*  
26  
27

1 *Guetschow, 869 F.2d 1298, 1300-01 (9th Cir. 1989).*

2  
3 2. This is not a mistake or accident, Defendant has many shell  
4 companies which he similarly names, but creates two identical  
5 versions of similar to Inc. and LLC, he does the same in Denmark:  
6 ApS and IVS (Exhibit ZH). This is intentional concealment and a  
7 blatant fraudulent scheme to conceal jurisdiction, assets, and  
8 liability – intentionally creating domestic and foreign shell  
9 companies which have no business purpose beyond being a sword  
10 and a shield for both tax and liability purposes. Many of the  
11 international shells resolve to the exact same address as  
12 Defendant’s basement HQ. Ironically, the other controllers of the  
13 Company follow similar structures and entanglement into each  
14 others shell Companies (Exhibits ZI, ZJ).

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19 3. Defendant has made express admissions since 2016 that they had  
20 no intention to return to Denmark, establishing domicile. (Exhibit  
21 R) in which Defendant stated: “... *absolutely fantastic first day in*  
22 *SF. We’ve moved into our new home and have no return ticket –*  
23 *shiiit*” “*The crazy journey with Rokoko that started 2.5 years ago*  
24 *has now turned up another gear...*”

1 4. Defendants intention to not return, and instead to remain in San  
2 Francisco permanently, satisfies the definition of domicile under  
3 Kanter v. Warner-Lambert Co., 265 F.3d 853, 857 (9th Cir. 2001):

4  
5  
6 *“A person’s domicile is her permanent home, where she resides*  
7 *with the intention to remain or to which she intends to return. A*  
8 *person residing in a given state is not necessarily domiciled there,*  
9 *and thus is not necessarily a citizen of that state.”*

10  
11  
12 **m. DEFENDANT IS USING UNADMITTED ATTORNEYS PRO HAC VICE**  
13 **APPLICATIONS MUST BE DENIED AND DOCUMENTS STRICKEN**

14 Those individuals who were removed from docket and noticed for lack of pro hac  
15 vice status continued the unauthorized practice of law and engaged personally  
16 with Plaintiff **after removal from docket and notification**, issuing directives and  
17 making statements as if they were representative counsel. (Exhibit T, U, V)

18  
19  
20 **n.** Those individuals who were removed from docket continued affixing their names  
21 to documents after removal under the legal nullity (pro hac vice forthcoming),  
22 instead of ceasing to participate as Counsel until approval by the Court (Exhibit  
23 X.1, X.2).

24  
25  
26 **o.** The repeated appearance **even after removal from the docket** of attorneys with  
27 no pro hac vice status on filings (Exhibit X-Y), in communications with Plaintiff

(Exhibit T, U, V, ZB, ZK-ZN), is cause for denial of their applications under Rule 12(b): *“Absent special circumstances, repeated appearances by any person under this rule is a cause for denial of an application.”*

p. Defendant’s removal was not based on a legitimate belief in jurisdiction, but rather on a strategy to run out the clock on state court deadlines.

**III. LEGAL STANDARD**

a. 28 U.S.C. § 1447(c): *“If at any time before final judgment it appears the district court lacks subject matter jurisdiction, the case must be remanded.”*

b. Fed. R. Civ. P. 11(b): Attorneys must ensure that any claims or legal contentions are warranted by law and fact.

c. Fed. R. Civ. P. 12(f): The Court may strike any filing that is “redundant, immaterial, impertinent, or scandalous.”

d. Courts have inherent authority to strike filings and impose sanctions when a party abuses the judicial process or commits fraud on the court.

**IV. ARGUMENT**

- 1 a. The Court Lacks Jurisdiction — The Removal Was Based on False Facts
- 2 b. Defendant claimed diversity jurisdiction based on being a foreign company.
- 3 However, Public business records, statements, and filings show its real
- 4 headquarters is in California and principal place of business.
- 5
- 6 c. The entity is not diverse from Plaintiff, and therefore removal was improper from
- 7 the start.
- 8 d. Defendant(s) are of Danish nationality/citizenship and cannot claim diversity
- 9 jurisdiction.
- 10 e. Defendant(s) made false statements to the Danish government to secure DKK 19
- 11 Million in investment money under false pretense of Denmark being the nerve
- 12 center, while domiciling here – and running Rokoko from here.
- 13
- 14 f. Defendant has already been accused, with video proof in the Complaint of
- 15 committing spoliation of evidence more than once.
- 16
- 17 g. Defendant has a history of creating an Inc. and an LLC even abroad (ApS and
- 18 IVF) of the same name to avoid liability and tax burdens as he sees fit with a
- 19 floating hand.
- 20 h. Defendant’s CEO admittedly laundered money from itself into North-East
- 21 Venture and then back into Defendant pretending to be a third-party investor.
- 22
- 23 i. Defendant(s) are all of immigrant status, they are not natural citizens of the
- 24 United States and cannot claim citizenship diversity, especially with domestic Inc.
- 25 and LLC’s.
- 26
- 27 j. Removal was initially filed by Unauthorized Counsel.
- 28 k. Filings in this case were signed by individuals who are:

1 i. Not admitted to the federal bar in this district;

2 ii. Acting without valid legal authority, rendering their filings void.

3 l. Unauthorized counsel continued practicing law after being removed from the  
4 docket and being noticed by the Court.

5  
6 m. Plaintiff, an in pro per, had to litigate against a team of four attorneys, two of  
7 which are not authorized or admitted to practice in California yet continued  
8 despite Court order. This is unjust.

9 n. This entire removal was a Strategic Misuse of Removal to Delay and Harm  
10 Plaintiff

11  
12 o. Defendant delayed responding to the complaint for over 60 days, failed to  
13 participate in legitimate court proceedings, and now seeks to:

14 i. Avoid a state court summary judgment hearing already calendared;

15 ii. Hide behind procedural gamesmanship.

16  
17 p. This is not harmless error — it is abuse of process, and Plaintiff has suffered real  
18 commercial harm as a result.

19  
20 **REQUEST FOR RELIEF**

21 Plaintiff respectfully asks the Court to:

22  
23  
24 I. Not to simply remand this case, but to **Strike the Notice of Removal in its entirety.**

25  
26 II. Strike all federal filings submitted by Defendant or their unauthorized representatives;

1 III. Allow this case to be again heard by the California Superior Court immediately, but  
2 without the legal protections offered by a standard remand (one who has not been  
3 stricken) with no tolling protections to be available after.

4  
5  
6 IV. Award reasonable attorney’s fees, actual costs and miscellaneous costs under 28  
7 U.S.C. § 1447(c);

8  
9 V. Issue sanctions under Rule 11 or the Court’s inherent powers to deter similar conduct  
10 and punish the offenders.

11  
12  
13 VI. Disqualify ReedSmith (Defendant’s Counsel) from counsel of record for all the  
14 aforementioned and continuous unauthorized practice of law pursuant to Rules 5.5,  
15 9.40, CA BPC § 6125, § 6126 and the inherent authority of the Court under (*People*  
16 *ex rel. Dept. of Corporations v. SpeeDee Oil Change (1999) 20 Cal.4th 1135, Kirk v.*  
17 *First American Title Ins. Co. (2010) 183 Cal.App.4th 776*)

18  
19  
20 **CONCLUSION**

21 This is not a case of confusion or a clerical error — Defendant deliberately misled this Court and  
22 attempted to use federal removal procedures to frustrate justice. The Court has the authority and  
23 obligation to act decisively when a party engages in fraudulent and abusive conduct. Plaintiff  
24 should not be punished for following the law, while battling non-admitted out-of-state attorneys.

25  
26 This case never should have been removed to Federal Court in the first place. This wasn’t justice.

1 this was intentional manipulation by the Defendants and their counsel to avoid liability in a  
2 matter so clearly evidenced against them.

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Executed this 19th day of June, 2025, in Santa Clarita, California.



Matthew R. Walsh  
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 19, 2025, I served the following document(s):

**PLAINTIFFS MOTION TO STRIKE DEFENDANTS REMOVAL**

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

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.

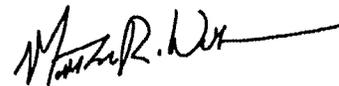
515 South Flower Street, Suite 4300

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 19, 2025

Santa Clarita, California



Matthew R. Walsh  
Plaintiff In Pro Per