

ORIGINAL

FILED

1 MATTHEW R. WALSH
2 19197 GOLDEN VALLEY RD #333
3 SANTA CLARITA, CA 91387
4 (661) 644-0012

5 Plaintiff In Pro Per,

2025 JUN 18 PM 3:15

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: 

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,

Case No.: 2:25-CV-5340 - ODW

12 **PLAINTIFF'S REPLY TO DEFENDANT'S
13 OPPOSITION TO EX PARTE TRO
14 APPLICATION**

15 vs.

16 ROKOKO ELECTRONICS
17 (AND DOES 1 THROUGH 50, INCLUSIVE)
18 31416 AGOURA RD STE 118
19 WESTLAKE VILLAGE, CA
20 91361

21 Defendant

22 **PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO**
23 **EX PARTE TRO APPLICATION**

24 The Opposition is procedurally void. It was filed by attorneys not admitted to
25 practice in this Court, including one (Emily Graue) previously removed from the docket, yet
26 continuing to communicate with Plaintiff by e-mail and phone to state her legal intentions during
27 meet and confer sessions. Emily Graue was removed from docket on June 15, 2025 and yet has
28 been a common name in filings and communications forthwith well into the day of this writing.

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2 Defendant's opposition fails on substance as well. Defendant admitted they
3 removed this case mid-litigation to stall a Motion for Summary Judgment they knew was fatal:
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- 5
6 1. *"On May 12, 2025, Plaintiff filed the Complaint that is the subject of this action in*
7 *the Superior Court of California"*
8
9 2. *"On June 5, 2025, prior to Defendant's removal, Plaintiff filed a Motion for*
10 *Summary Judgment against Defendant"*
11
12 3. *"On June 12, 2025, before the deadline to file a responsive pleading in the State*
13 *Court Action, Defendant timely removed the State Court Action to the United States*
14 *District Court"*
15
16

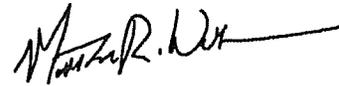
17
18 Defendant concedes they knew litigation was pending, knew a general appearance had
19 been filed with overwhelming evidence; and yet failed to oppose or file any responsive pleading
20 in any way to anything they were served with. Their opposition to this ex-parte motion is the
21 **first time Defendant has filed anything in reply to Plaintiff.**
22

23
24 Defendant and their Counsel ignore the record, manipulate procedure, misstate law, make
25 false statements to the Court, omit jurisdiction-defeating evidence intentionally (*see Declaration*
26 *Re: Motion to Remand*), and offer nothing under oath but boilerplate filings devoid of substance
27 – likely to later claim "excusable neglect" to get the dismissal they so clearly desire:
28

1 Plaintiff's Supplemental Declaration named "SUPPLEMENTAL
2 **DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF PLAINTIFFS MOTION**
3 **TO STRIKE DEFENDANTS EX PARTE APPLICATION FOR EXTENSION OF TIME**
4 **TO RESPOND TO COMPLAINT"** and the evidence filed concurrently show why the TRO is
5 necessary and why remand is inevitable.
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8 Respectfully submitted,
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10 Dated: June 17, 2025
11

12 
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14 _____
15 Matthew R. Walsh
16 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 17, 2025, I served the following document(s):

6 **PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO EX PARTE TRO**
7 **APPLICATION**

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

9 **Reed Smith LLP (Counsel for Defendant)**

10 Heather Valencia, Esq.

11 Hvalencia@reedsmith.com

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

14 **Reed Smith LLP (Counsel for Defendant)**

15 Heather Valencia, Esq.

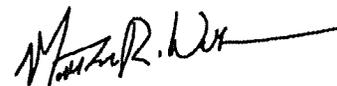
16 515 South Flower Street, Suite 4300

17 Los Angeles, CA 90071

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

20 Executed on June 17, 2025

21 Santa Clarita, California



22 _____
23 Matthew R. Walsh
24 Plaintiff In Pro Per