

ORIGINAL

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2025 JUN 20 PM 7:34

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

**SUPPLEMENTAL DECLARATION OF
MATTHEW R. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION TO STRIKE
DEFENDANTS REMOVAL AND
SUBSEQUENT FILINGS – IN LIEU OF
MOTION TO REMAND**

**SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION TO STRIKE DEFENDANTS REMOVAL AND SUBSEQUENT
FILINGS**

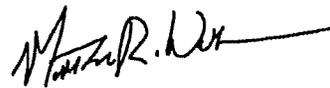
20 I, Matthew R. Walsh, declare as follows:

- 21
- 22 1. I am the Plaintiff in the above-captioned matter. I submit this supplemental declaration in
23 further support of my **MOTION TO STRIKE DEFENDANTS REMOVAL**. I have
24 personal knowledge of the facts set forth herein and, if called to testify, could and would
25 competently do so.

26
27 I declare under penalty of perjury under the laws of the United States that the foregoing is true

1 and correct.

2
3 Executed this 19th day of June, 2025, in Santa Clarita, California.

4
5 

6
7 _____
8 Matthew R. Walsh
9 Plaintiff In Pro Per
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1 **EXHIBIT A**

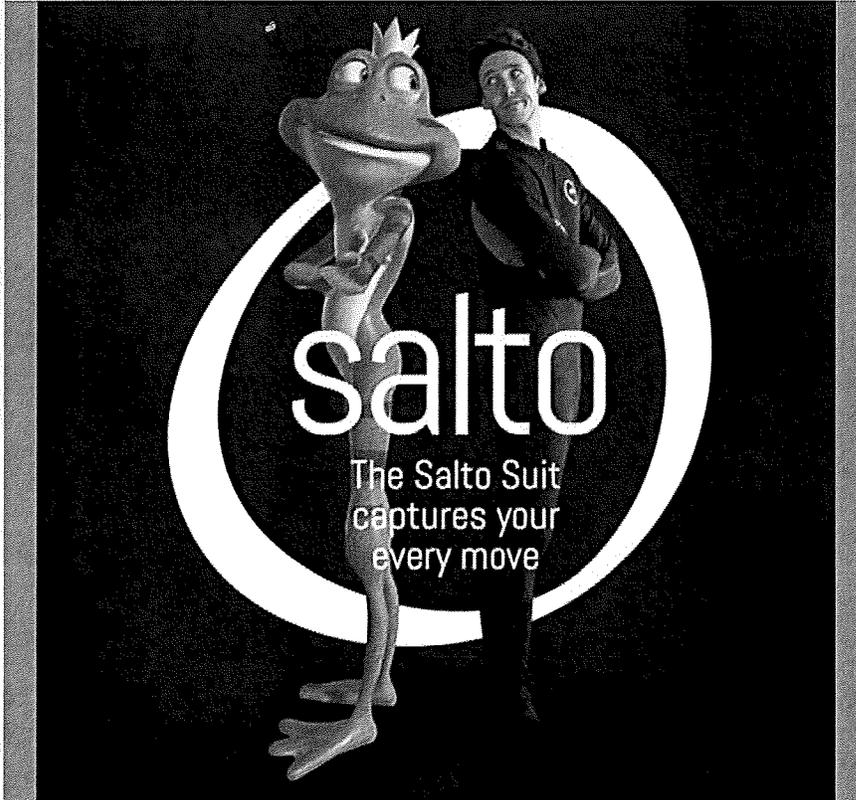


Jakob Balslev
September 9, 2015 · 🌐

4 Der sker ting og sager i Rokoko for tiden. Klar til at lancere Kickstarter-kampagne til Techcrunch
5 Disrupt i San Francisco d. 22. september

6 Things are happening in Rokoko at the moment. Getting ready to launch the Kickstarter
7 campaign for Techcrunch Disrupt in San Francisco d. 22. september

8 · Hide Translation · Rate this translation



5 comments 2 shares

22 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
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24 connection with this case, and it has not been materially altered.

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

26

27 Matthew R. Walsh
28 Plaintiff in pro per

EXHIBIT B



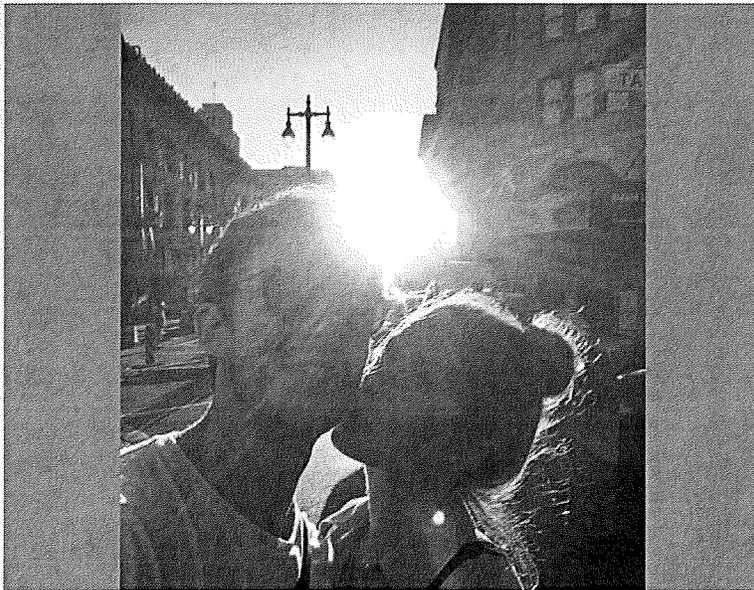
Jakob Balslev is with Moe Brandt in Hayes Valley.
September 27, 2016 · 🌐

...

Så skete det endelig... SAN FRANCISCO baby! Mens I så småt er ved at vågne derhjemme, er vi ved at gå i seng efter en helt fantastisk første dag i SF. Vi er flyttet ind i vores nye hjem og har ingen returbillet - shiiit 🐼 Den vanvittige rejse med Rokoko, som startede for 2,5 år siden er nu sat endnu et gear op, og jeg er så stolt af, at vi er nået her til! Jeg ved, at I allesammen er sådan nogle seje typer, som kender nogen, der kender nogen. Så please hook os op med alle de se... See more

Well, it finally happened... SAN FRANCISCO baby! While you are just waking up at home, we are about to go to bed after an absolutely fantastic first day in SF. We've moved into our new home and have no return ticket - shiiit 🐼 The crazy journey with Rokoko that started 2.5 years ago has now turned up another gear and I'm so proud of how far we've come! I know y'all some cool types who know somebody that knows somebody. So please hook us up with all the cool people you know in... See more

🌐 · Hide Translation · Rate this translation



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

Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT C**



2 Danes in San Francisco & Bay Area - DABGO · Join
3 Jakob Balslev · January 9, 2019 · 🌐

4 Vores lille familie flytter fra vores skønne cottage i hjertet af Noe Valley d. 15 januar, fordi vi har
5 brug for lidt mere plads til vores meget aktive søn på snart 1 år.
6 Stedet har været på danske hænder de seneste par år, fordi vores landlady har et soft spot for
7 vores folkefærd og godt kan lide at leje ud til danskere:) Fantastisk beliggenhed og enormt
8 hyggeligt lille hus - hvis nogen i denne gruppe leder efter bolig, kan vi varmt anbefale at kigge
9 nærmere. Som altid på boligmarkedet i SF skal man være forberedt på at rykke hurtigt, hvis man
10 skal have en chance.
11 Åbent hus på lørdag fra 11-12 🕒

12 Our little family moving from our lovely cottage in the heart of Noe Valley d. January 15,
13 because we need a little more space for our very active almost 1 year old son.
14 The place has been in Danish hands the last few years, because our landlady has a soft spot for
15 our people's behavior and likes to rent it out to Danes 😊 Great location and hugely cozy little
16 house - if anyone in this group is looking for accommodation, we highly recommend that look
17 closer. As always in the ... See more

18 🌐 · Hide Translation · Rate this translation

19 SFBAY.CRAIGSLIST.ORG

20 **STUNNING TWO STORY VICTORIAN COTTAGE NEWLY REMODED**

21 OPEN HOUSE: Saturday January 12th (11:00am to 12:00pm) 1484 Sanchez at 28th St. Please ca...



22 1 comment

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27

28 Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT D**



Jakob Balslev
September 18, 2015 · 🌐

4 Sådan ser det ud, når en suspicious-looking arab gentleman with possible explosives in hand
5 luggage lige har snydt sig igennem det extra security check, som han var "randomly" selected for.
6 Den svenske familie ved siden af er tydeligvis ikke helt begejstrede - men det er vi! På vej til San
7 Francisco for at lancere Rokokos Kickstarter-kampagne på TechCrunch Disrupt. Vi glæder os!
8 Tilbage i DK d. 28.

9 This is what it looks like when a suspicious-looking Arab gentleman with possible explosives in
10 hand luggage has just cheated his way through the extra security check for which he was
11 "randomly" selected. The Swedish family next door is obviously not quite thrilled - but we are!
12 Heading to San Francisco to launch Rokoko TechCrunch campaign at Kickstarter Disrupt.
13 We're looking forward to it! Back in DK d. 28.

14  · [Hide Translation](#) · [Rate this translation](#)



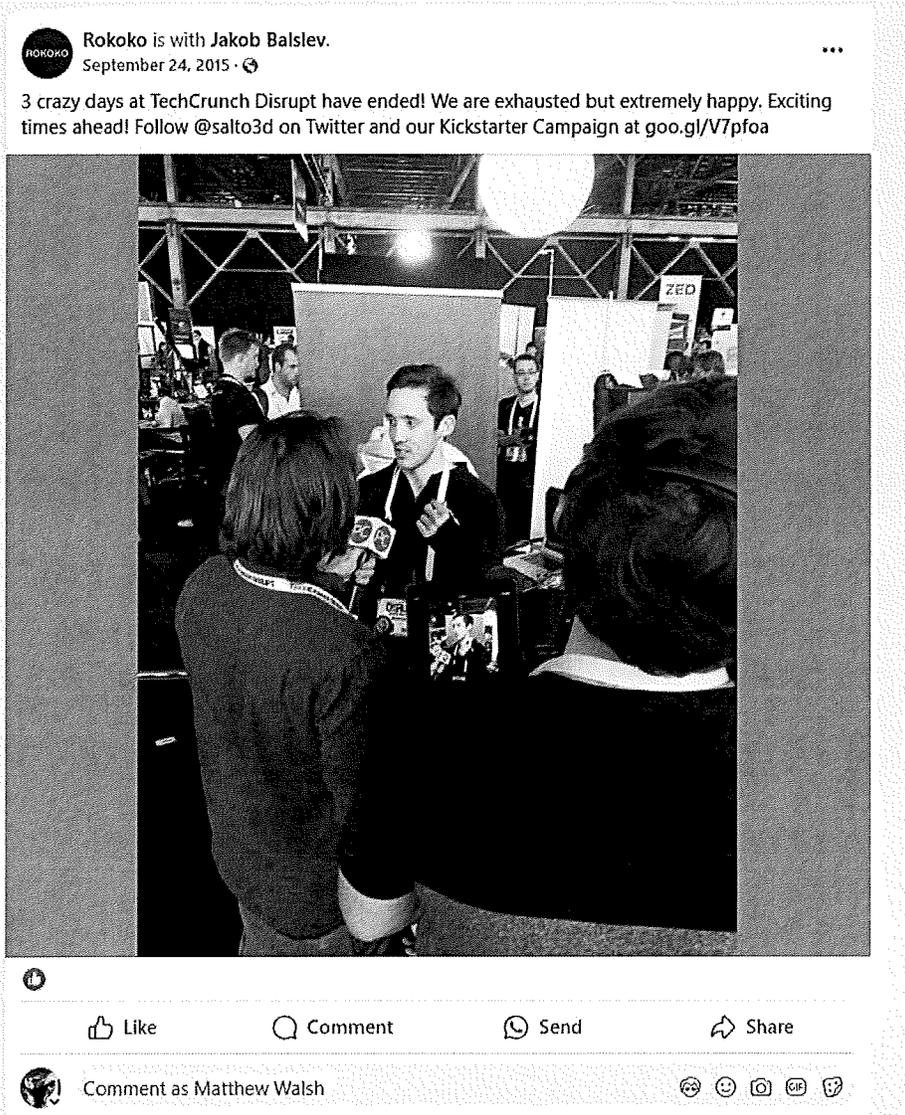
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26 

27 Matthew R. Walsh
28 Plaintiff in pro per

1 EXHIBIT D.1



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24
25 

26 Matthew R. Walsh
27 Plaintiff in pro per

1 **EXHIBIT E**



2 Jakob Balslev
September 22, 2015 · 🌐

3 Ok, now it's fucking goofy! Rokoko Kickstarter campaign is finally live! I know you're not all
4 probably in need of a sensor-based motion capture suit but you might know someone who
5 knows someone who works in animation or games or virtual reality or just loves technology.
6 The short of the long is, it would be really amazing if you guys could help us share and get the
7 word out there in the world! HOORAY! ❤️ from very early morning here in San Fran

8 * See original · Rate this translation



19 Rokoko
September 22, 2015 · 🌐

20 WE ARE LIVE!! Kickstarter has Staff Picked us and named us "Tech Project of the Day".
21 www.goo.gl/V7pfoa Check out our campaign and help us reach as many gamers, virtual... See

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26 Matthew R. Walsh
27 Plaintiff in pro per

EXHIBIT F



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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT H

1

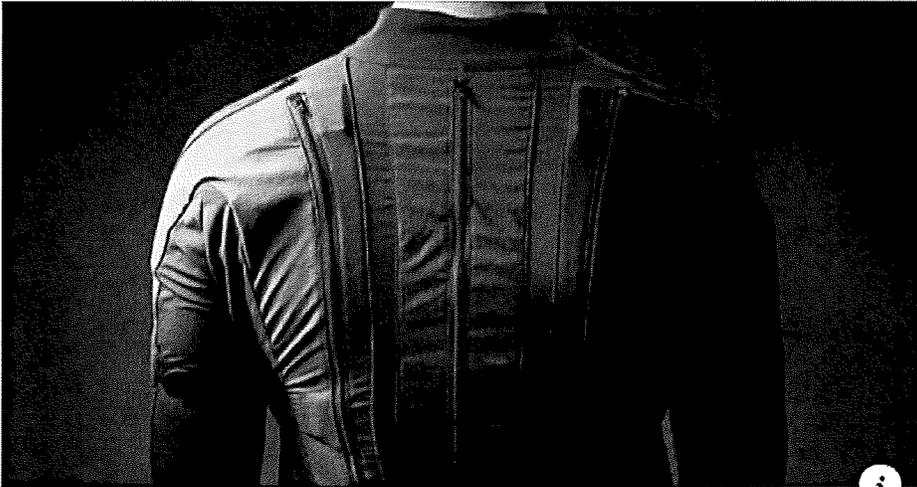
2

3 **Jakob Balslev**
May 9, 2017 · 🌐

4 Moe's birthday in sunny SF and Rokoko in Wired ❤️ Loving this Tuesday 🍷🍷🍷

5 **Rokoko**
May 9, 2017 · 🌐

6 "Motion capture this good usually costs hundreds of thousands of dollars...Rokoko's Smartsuit Pro, on the contrary, puts the entire studio set-up into one \$2,500 suit."... See more

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16 WIRED.COM
The Rokoko Smartsuit Brings Motion Capture to the Masses
The \$2,500 device makes motion capture as easy as suiting up.

17

18  8 comments

19 Like Comment Send

20

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25 

26 Matthew R. Walsh
27 Plaintiff in pro per

EXHIBIT I

Vision Denmark · Follow
 August 26, 2022 · 🌐

Stort tillykke til Rokoko med deres investering fra sydkoreanske Naver Z, virksomheden bag den populære 3D avatar-app Zepeto.

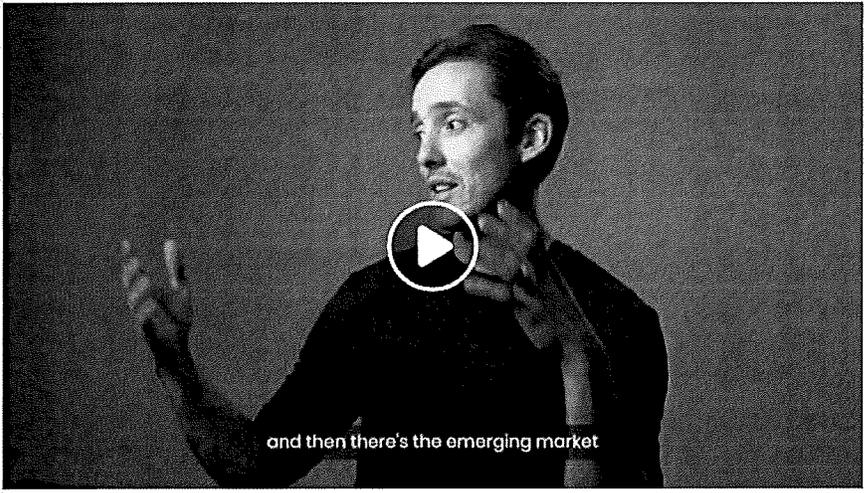
"With this investment from Naver Z, we are joined by one of the strongest and fastest moving metaverse companies in the world, and our plans to expand our business into Asia just got supercharged," fortæller Rokoko CEO og medstifter Jakob Balslev til TechCrunch.

Den nye investeringsrunde værdisætter Rokoko til knap 600 million DKK. Godt gået Jakob Balslev, Matias Søndergaard og Anders Klok Sander 🙌 ! Vi glæder os til at følge og støtte jeres videre eventyr.

Læs mere om investeringen her 📄 <https://techcrunch.com/2022/08/17/rokoko-fundraise/>
 Eller lær Rokoko og deres motion capture-teknologi bedre at kende i Digital Hub Denmark's portrætvideo her 📺

Big congratulations to Rokoko with their investment from South Korean Naver Z, the company behind the popular 3D avatar app Zepeto.... See more

⚙️ · Hide Translation · Rate this translation



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Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT I.1**

2

3  **Rokoko** August 19, 2022 · 🌐

4 Proud and excited to welcome NAVER Z as our new investor. It is unique to find an investor with
 5 such a strong strategic fit, and we can't wait to have them join our journey! 🚀
 6 <https://techcrunch.com/2022/08/17/rokoko-fundraise/>

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16 SOCIAL.TECHCRUNCH.COM

17 **Motion capture becomes more accessible as Rokoko raises at \$80M valuation – TechCrunch**

18  1 comment 3 shares

19 Like Comment Send Share

20

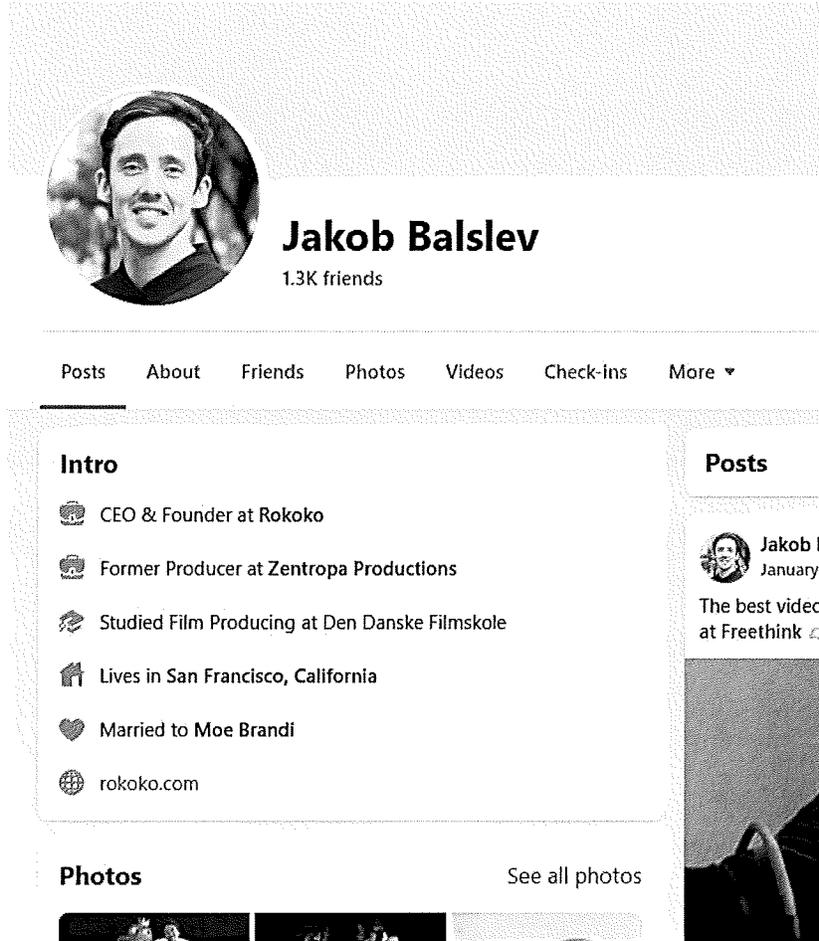
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25
 26 Matthew R. Walsh
 27 Plaintiff in pro per

EXHIBIT J



The image shows a Facebook profile for Jakob Balslev. The profile picture is a circular portrait of a man with short dark hair and a slight smile. To the right of the picture, his name 'Jakob Balslev' is displayed in bold black text, with '1.3K friends' underneath. Below the name is a navigation bar with tabs for 'Posts', 'About', 'Friends', 'Photos', 'Videos', 'Check-ins', and 'More'. The 'About' section is expanded, showing an 'Intro' with several items: 'CEO & Founder at Rokoko', 'Former Producer at Zentropa Productions', 'Studied Film Producing at Den Danske Filmskole', 'Lives in San Francisco, California', 'Married to Moe Brandi', and a website link 'rokoko.com'. To the right of the 'About' section is a 'Posts' section showing a post by Jakob Balslev from January 1st with the text 'The best video at Freethink' and a video thumbnail.

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT K

← **Matias Søndergaard**
788 posts

Q Search




You might like

-  **Rokoko**
@hellorokoko
-  **Peter Skinner**
@PetesName
-  **Chaz** ⚡
@ChazForsman

Show more

Matias Søndergaard
@Matiaslevi

Interested in making things that matter with the means of digital tools & human imagination. Co-founder @helloRokoko

📍 San Francisco, CA 🌐 rokoko.com 📅 Joined April 2010

559 Following 305 Followers

Not followed by anyone you're following

What's happening

 **Giants at Dodg**
1 hour ago

Love Island USA · Trending
#LoveIslandUSA

Posts Replies Media

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT L

Rokoko's New US Warehouse + Must-See MetaHuman and Unity Workflows



Rokoko <hi@rokoko.com>
To Matthew Walsh

Reply Reply All Forward

Thu 6/5/2025 7:16 AM

If there are problems with how this message is displayed, click here to view it in a web browser.



us Our US Warehouse Is Open and Ready to Serve You!

Big news for our American community! Our US warehouse is officially OPEN and running!
Here's what this means for you:

No More Extra Fees: Say goodbye to unexpected taxes, duties, and customs hassles!
We've got it covered.

Faster Shipping: Once we clear the current backlog (happening now!), expect your orders ASAP.

New Affordable Rates: Enjoy simplified and cheaper shipping options.

Thanks for being an awesome community! Let us know if you have any questions.

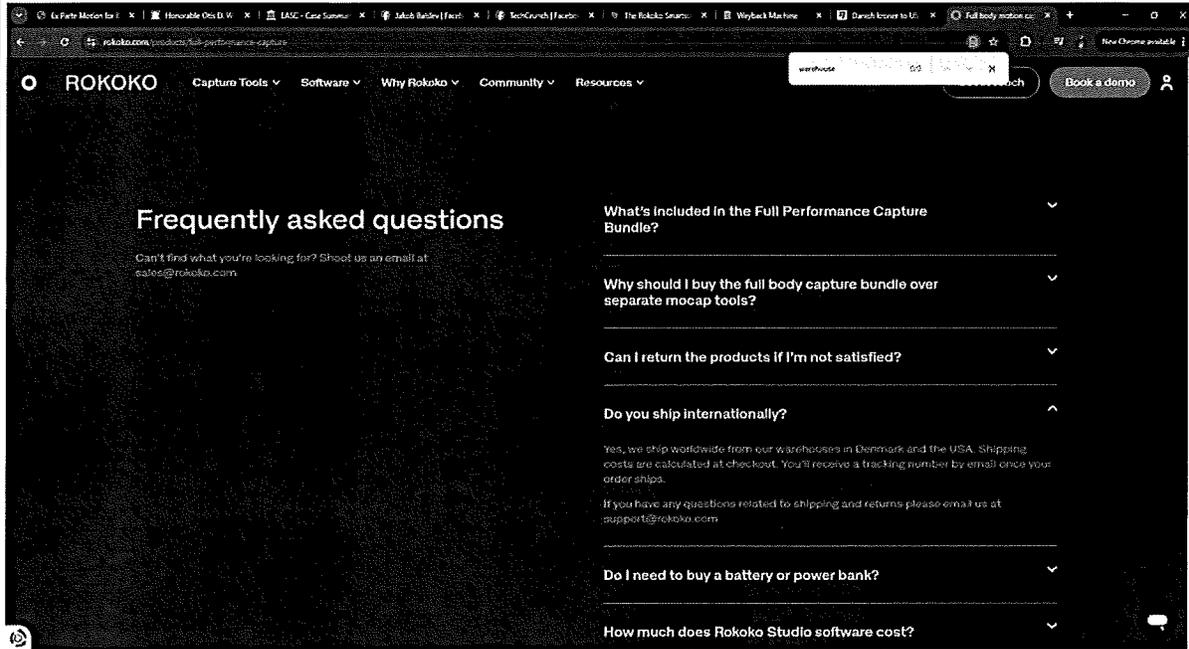
Now, it's time to check out two amazing workflows in MetaHuman and Unity + a beautiful animation that tells a heartbreaking story

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EXHIBIT L.1

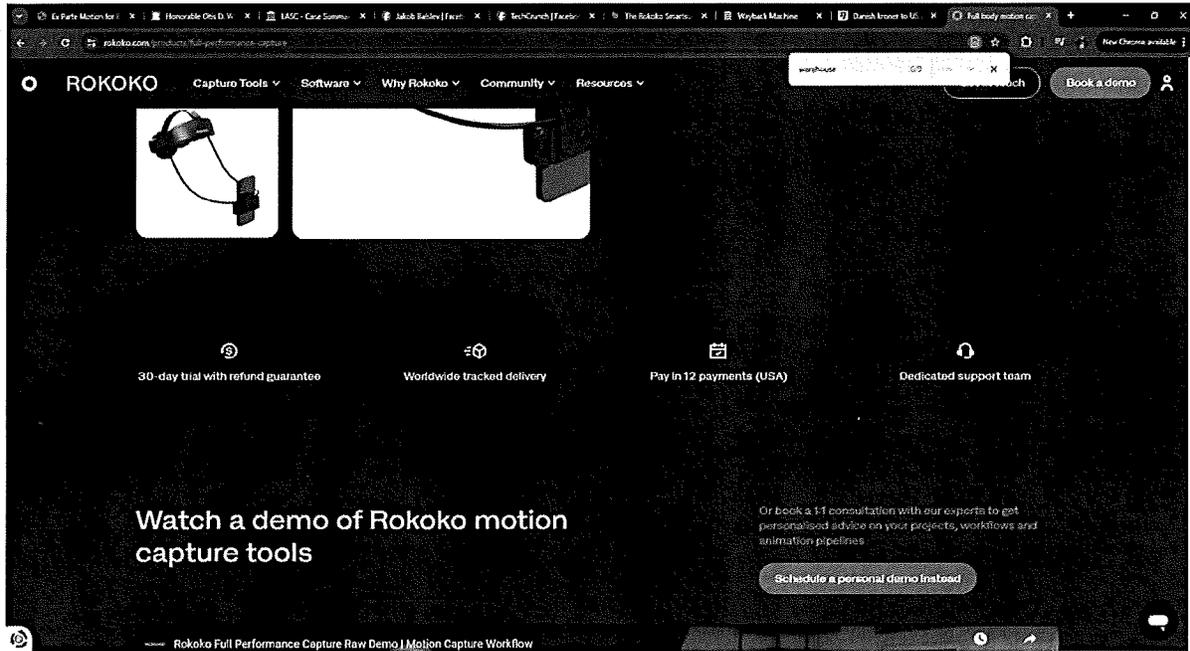


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EXHIBIT M

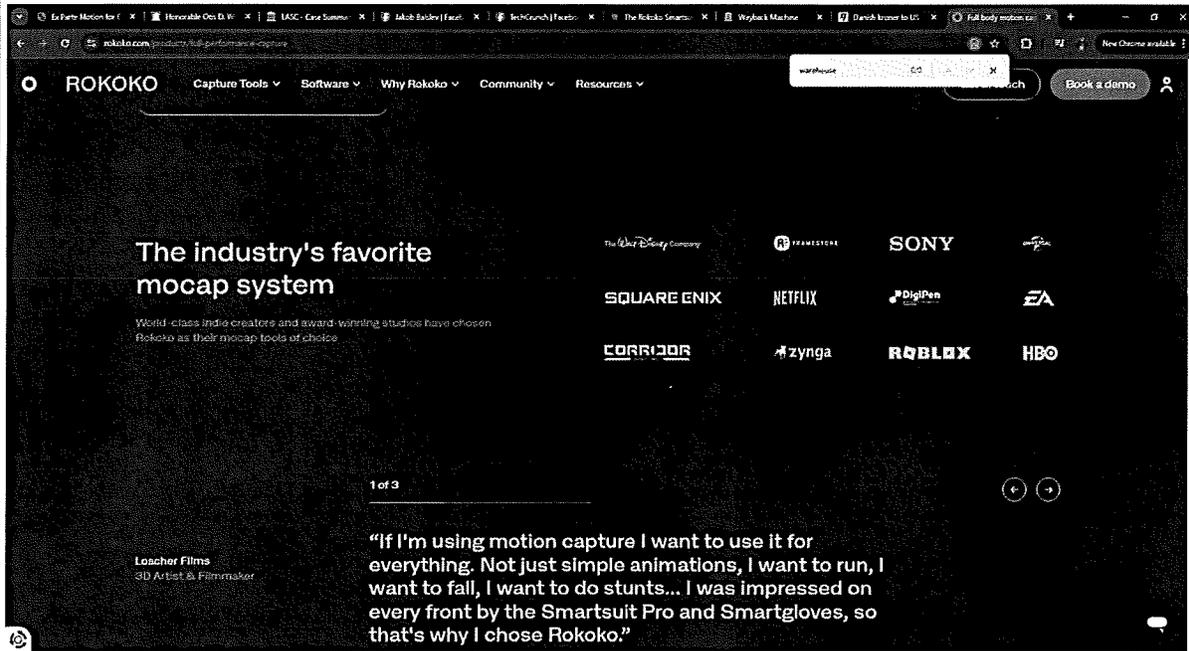


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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT N

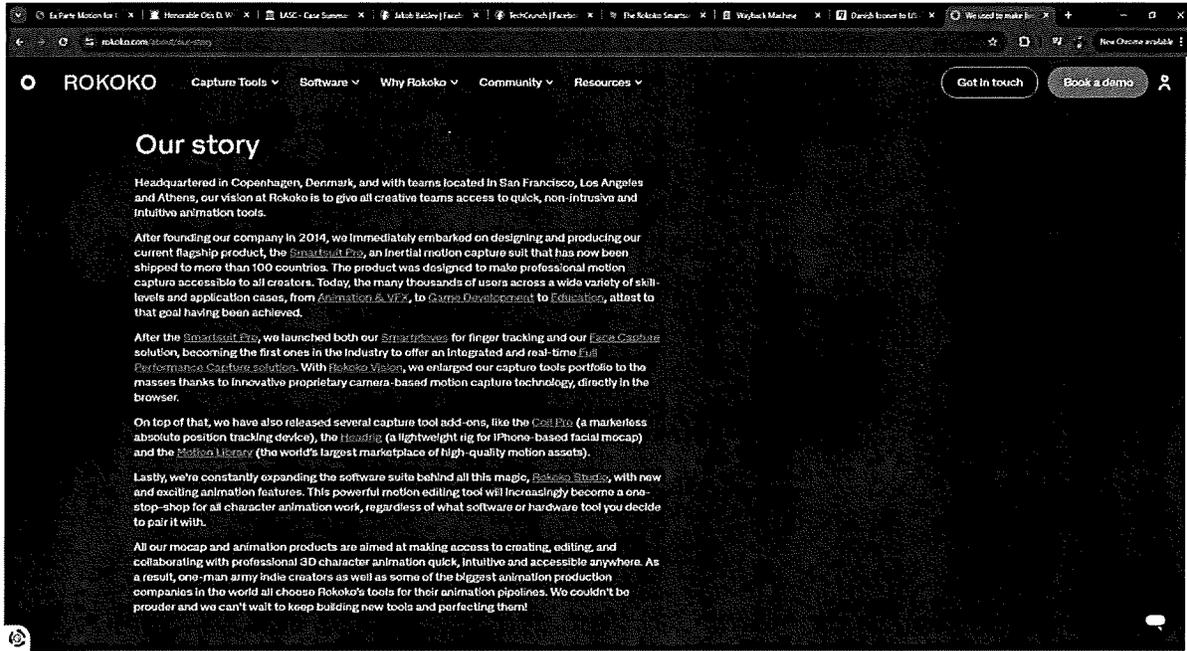


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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT O

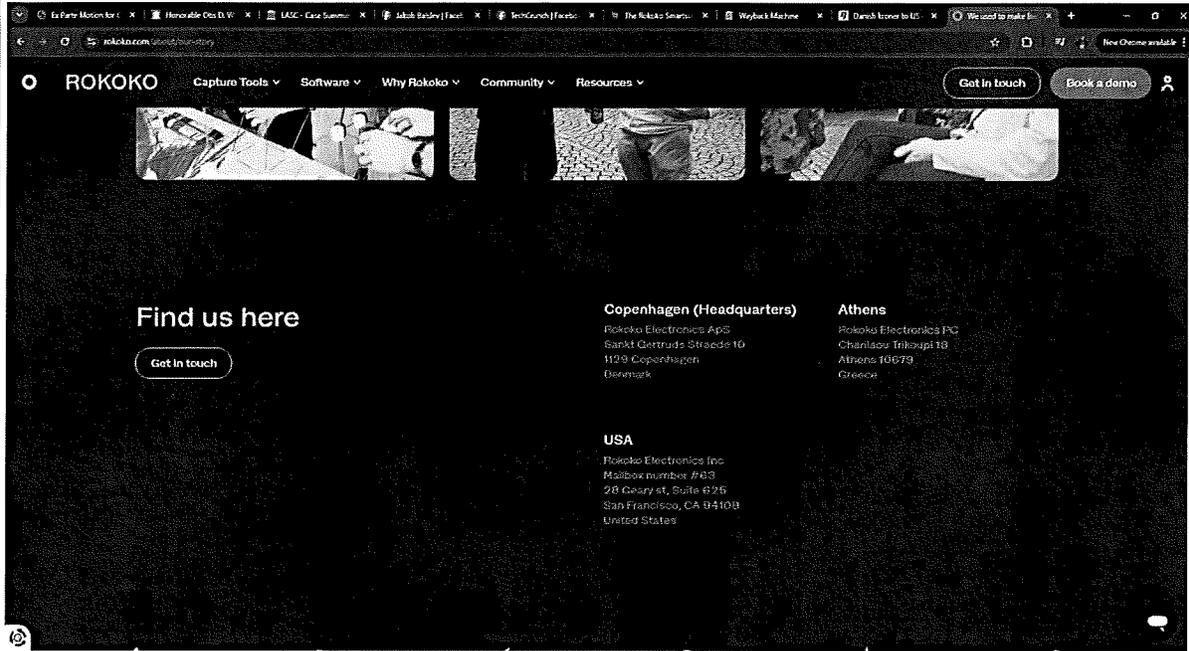


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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT P



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Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT Q**

2 Your Rokoko Quote #D2465



3 Daniel Nikolaison <daniel.nikolaison@rokoko.com>
4 To matthew@winteryear.com

5 <- Reply << Reply All -> Forward ...

Tue 4/15/2025 2:18 AM

6 ⓘ If there are problems with how this message is displayed, click here to view it in a web browser.
7 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

8 Right-click or tap and hold

QUOTE #D2465

9 **Accept your quote**

10 Thank you for requesting a quote from us. To accept the quote you can pay online
11 through the link below, by bank transfer to our account or send us a Purchase
12 Order.

13 Account name: Rokoko Electronics

14 Silicon Valley Bank, 3003 Tasman Drive, Santa Clara, CA 95954

15 ABA: 121140399

16 Account: 3301333454

17 SWIFT: SVBKUS6S

18 When paying by bank transfer, please state the order/quote number.

19 Please write us, if you have any questions regarding the ordering process.

20 **Accept your quote**

21 or Visit our store

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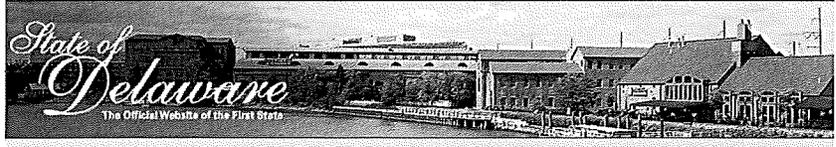
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26

27 Matthew R. Walsh
28 Plaintiff in pro per

EXHIBIT R

1301corp.delaware.gov/ecorp/entitysearch/nameSearch.aspx



Department of State: Division of Corporations

HOME

Frequently Asked Questions

To retrieve information on a Delaware entity, Key In the name of the entity you are search. The search results will return both active and inactive entities from our database. This is an indication of the current status of an entity. The information provided in this application real time and reflects the information on our database as of the date of the search. When list of names is returned click the name and the Information page will be returned.

The entity information provided on this website, free of charge, consists of the entity name, file number, incorporation/information date, registered agent name, address, phone number, and residency.

However, additional information can be obtained for a fee.

To order a Certificate of Status, or a Certified Copy or Plain copy of a filed document, contact a [Delaware online agent](#) or submit a request using the [Document Filing and Certificate Request Service](#).

For more information please read the [Frequently Asked Questions](#) page.

General Information Name Search

* Required Field

* Entity Name: or * File Number:

[This field is not case sensitive]
[For exact searches use quotation marks]

FILE NUMBER	ENTITY NAME
5755632	ROKOKO ELECTRONICS, INCORPORATED
6007440	ROKOKO, LLC

The intent of this tool is to provide general entity details. The Division of Corporations prohibits mining data. Excessive and repeated searches that may have a negative impact on our systems and customer experience are also prohibited. Use of automated tools in any way may result in the suspension of your access to utilize this service.

For help on a particular field click on the Field Tag to take you to the help area.

[site map](#) | [privacy](#)

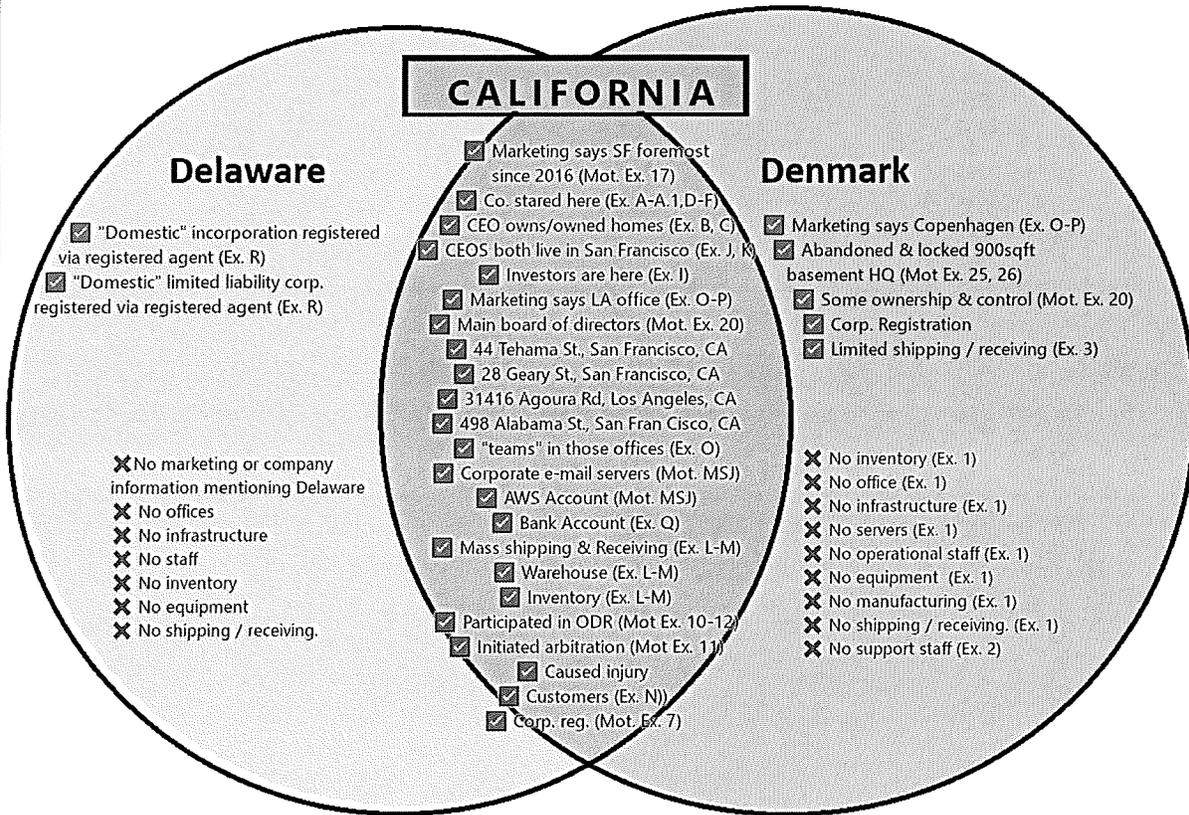
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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT S



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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT T

RE: Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



Graue, Emily H. <EGraue@reedsmith.com>
To matthew@winteryear.com
Cc Galibois, Michael B.; Ellena, Katherine J.

Reply Reply All Forward

Mon 6/16/2025 3:38 PM

Thanks for your note, Mr. Walsh. We understand you're not inclined to agree with any points of law or fact we offer. That's ok. Both sides can agree to disagree. Not uncommon at all—we can let the court to decide. But as you asked for our position, it is clear that removal divests the state court of jurisdiction until your remand motion is decided in federal court. The state court equally will understand this point. So, we intend to oppose your remand motion. If remand is denied (which is our position it clearly should be), then the matter will proceed in federal court. If remand is granted (as is your position), the matter would be remanded to proceed then in state court.

Hope this is helpful at least in confirming our position.

In the interim, with respect to electronic service in federal court, please see C.D. Cal. Local Rule 5-3 and note that the parties are required to follow this rule. Separately, any state court filing is improper for the reasons set forth above and so we do not consent to electronic service.

Best,

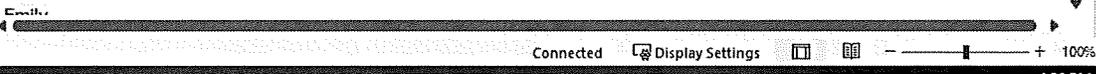
Emily Graue
Associate
Global Commerical Disputes
She/Her/Hers

EGraue@reedsmith.com
D: +1 312 207 2954
M: +1 630 895 1773

Reed Smith
10 South Wacker Drive
Chicago, IL 60606-7507
T: +1 312 207 1000
F: +1 312 207 6400
reedsmith.com

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, June 16, 2025 4:46 PM
To: Graue, Emily H. <EGraue@reedsmith.com>
Cc: Galibois, Michael B. <MGalibois@reedsmith.com>; Ellena, Katherine J. <KEllena@reedsmith.com>
Subject: RE: Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>



I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per
PAGE 25

EXHIBIT U

Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



Graue, Emily H. <EGraue@reedsmith.com>
To matthew@winteryear.com
Cc Galibois, Michael B.; Ellena, Katherine J.

Reply Reply All Forward

Mon 6/16/2025 2:15 PM

You replied to this message on 6/16/2025 2:46 PM.

Mr. Walsh,

Defendant Rokoko Electronics, via counsel Reed Smith LLP, will be filing an Ex Parte Application for Additional Time to Respond to the Complaint today, June 16, 2025, pursuant to Local Rule 8-3. This was also indicated when we spoke on the phone earlier. If you wish to oppose this motion, you must respond within 24 hours. Please let us know if you have any questions or would like to discuss further.

Best,

Emily Graue
Associate
Global Commerical Disputes
She/Her/Hers

EGraue@reedsmith.com
D: +1 312 207 2954
M: +1 630 895 1773

Reed Smith
10 South Wacker Drive
Chicago, IL 60606-7507
T: +1 312 207 1000
F: +1 312 207 6400
reedsmith.com

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT V

RE: Matthew R. Walsh v. Rokoko Electronics et al



matthew@winteryear.com
To 'Valencia, Heather R.'
Cc 'Ellena, Katherine J.'

Reply Reply All Forward

Tue 6/17/2025 11:50 PM

You replied to this message on 6/18/2025 7:48 PM.

- PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO MOTION TO STRIKE.pdf
199 KB
- SUPPLEMENTAL DECLARATION IN SUPPORT OF PLAINTIFFS MOTION TO REMAND.pdf
3 MB

Hello Heather and Ellena,

I have removed Michael and Emily from the e-mail chain since they are not allowed to practice law in this state and have been removed from docket yet continue to communicate and appear on filed documents.

See attached for my opposition and again the supplemental declaration.

Both have been filed with the Court.

Thank you
Matthew R. Walsh

From: Valencia, Heather R. <HValencia@ReedSmith.com>
 Sent: Tuesday, June 17, 2025 6:30 PM
 To: matthew@winteryear.com
 Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
 Subject: Matthew R. Walsh v. Rokoko Electronics et al

Good evening,

Please see the attached document.

DEFENDANT'S OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND MOTION TO STAY PROCEEDINGS

Thank you,

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT X

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5. On June 12 and June 13, 2025, I instructed my colleague, Emily Graue, to call and email Plaintiff to request his consent to a stipulation of time to respond to the Complaint. She did not receive an answer. Attached hereto as **Exhibit 1** is a true and correct copy of Ms. Graue's email to Mr. Walsh.

6. On June 13, 2025, Plaintiff informed my office through a phone call that he intended to oppose any motion for enlargement of time. Ms. Graue informed me that Plaintiff stated to her on the phone that he "is going to oppose pretty much everything."

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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



Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT X.1

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State of Delaware

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DATED: June 16, 2025

REED SMITH LLP

By: /s/ Katherine J. Ellena
Katherine J. Ellena
Michael Galibois (PHV forthcoming)
Emily Graue (PHV forthcoming)

Attorney for Defendant
Rokoko Electronics

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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



Matthew R. Walsh
Plaintiff in pro per

EXHIBIT X.2

1 Michael Galibois (*pro hac vice forthcoming*)
2 mgalibois@reedsmith.com
3 Emily Graue (*pro hac vice forthcoming*)
4 egraue@reedsmith.com
5 Reed Smith LLP
6 10 S Wacker Drive
7 Floor 40
8 Chicago, IL 60606
9 Telephone: +1 312 207 1000
10 Facsimile: +1 312 207 6400

11 Katherine J. Ellena (SBN 324160)
12 kellena@reedsmith.com
13 REED SMITH LLP
14 515 South Flower
15 Suite 4300
16 Los Angeles, CA 90071-1514
17 Telephone: +1 213 457 8000
18 Facsimile: +1 213 457 8080

19 *Attorneys for Defendant*
20 *Rokoko Electronics*

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MATTHEW R. WALSH

Plaintiff,

vs.

Case No.: 2:25-cv-05340-ODW-RAO

[Assigned to Hon. Otis D. Wright, II, Courtroom 5D]

[PROPOSED] ORDER GRANTING

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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



Matthew R. Walsh
Plaintiff in pro per

EXHIBIT Y

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>)		DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>)	
Matthew R. Walsh		Rokoko Electronics	
(b) County of Residence of First Listed Plaintiff Los Angeles <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>		County of Residence of First Listed Defendant Delaware <i>(IN U.S. PLAINTIFF CASES ONLY)</i>	
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.		Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Reed Smith LLP Michael Galibois (SBN 6272257); 105 Wacker Drive, Floor 40, Chicago IL, 60606 Telephone: +1 213 457 8000, Facsimile: +1 213 457 8080	
II. BASIS OF JURISDICTION (Place an X in one box only.)		III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)	
<input type="checkbox"/> 1. U.S. Government Plaintiff	<input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party)	Citizen of This State	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1
<input type="checkbox"/> 2. U.S. Government Defendant	<input checked="" type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2
		Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3
		Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
		Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5
		Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6
IV. ORIGIN (Place an X in one box only.)			
<input type="checkbox"/> 1. Original Proceeding	<input checked="" type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened
		<input type="checkbox"/> 5. Transferred from Another District (Specify)	<input type="checkbox"/> 6. Multidistrict Litigation - Transfer
			<input type="checkbox"/> 8. Multidistrict Litigation - Direct File
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Check "Yes" only if demanded in complaint.)			
CLASS ACTION under F.R.Cv.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> MONEY DEMANDED IN COMPLAINT: \$ >\$75,000			
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity) 28 U.S.C. Sections 1332, 1441, and 1446; dispute arising out of Plaintiff's claim for damages due to tortious interference, fraud, intellectual property theft, breach of warranty, and related claims by Defendant			
VII. NATURE OF SUIT (Place an X in one box only.)			
<input type="checkbox"/> OTHER STATUTES	<input type="checkbox"/> CONTRACT	<input type="checkbox"/> REAL PROPERTY CONT.	<input type="checkbox"/> IMMIGRATION
		<input type="checkbox"/> PRISONER PETITIONS	<input type="checkbox"/> PROPERTY RIGHTS

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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



Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT Z**

- 2 A. Arise from the same or a closely related transaction, happening, or event,
- 3 B. Call for determination of the same or substantially related or similar questions of law and fact; or
- 4 C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

5 **X. SIGNATURE OF ATTORNEY**

(OR SELF-REPRESENTED LITIGANT): /s/ Katherine J. Ellena

DATE: June 12, 2025

6 **Notice to Counsel/Parties:** The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

8 **Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 USC 1395FF(h))

9 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
10 that this is a true and correct copy of a document I personally received, created, or obtained in
11 connection with this case, and it has not been materially altered.

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

13
14 

15
16 Matthew R. Walsh
17 Plaintiff in pro per

EXHIBIT ZA

515 South Flower Street, Suite 4300
 Los Angeles, CA 90071
 213-457-8000
 Fax: 213-457-8080
 Email: kellena@reedsmith.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant
Does
 1 through 50, inclusive

Date Filed	#	Docket Text
06/12/2025	1	NOTICE OF REMOVAL from Los Angeles Superior Court, case number 25STCV13828 Receipt No: ACACDC-39895326 - Fee: \$405, filed by Defendant ROKOKO ELECTRONICS. (Attachments: # 1 Exhibit 1 - Complaint, # 2 Exhibit 2 - Proof of Service of Summons, # 3 Exhibit 3 - Case Docket, # 4 Exhibit 4 - Declaration of Overby) (Attorney Katherine Jane Ellena added to party ROKOKO ELECTRONICS(pty.dft))(Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025	2	CIVIL COVER SHEET filed by Defendant ROKOKO ELECTRONICS. (Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025	3	CORPORATE DISCLOSURE STATEMENT AND NOTICE OF INTERESTED PARTIES filed by Defendant ROKOKO ELECTRONICS (Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025		CONFORMED COPY OF COMPLAINT against Defendants Does 1 through 50, inclusive, Rokoko Electronics, filed by Plaintiff Matthew R. Walsh. Filed in State Court on 5/12/2025 Submitted with Attachment 1 Exhibit 1 to Notice of Removal 1 (car) (Entered: 06/15/2025)
06/12/2025		CONFORMED COPY OF PROOF OF SERVICE OF SUMMONS AND COMPLAINT Executed by Plaintiff Matthew R. Walsh, upon Defendant Rokoko Electronics served on 5/14/2025, answer due 6/4/2025. Service of the Summons and Complaint were executed upon David Doe in compliance with California Code of Civil Procedure by personal service. Filed in State Court on 5/14/2025 Submitted with Attachment 2 Exhibit 2 to Notice of Removal 1 (car) (Entered: 06/15/2025)
06/13/2025	12	NOTICE OF MOTION AND MOTION TO REMAND TO SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES filed by plaintiff Matthew R. Walsh. (lc) (Additional attachment(s) added on 6/16/2025: # 1 LODGED proposed remand order) (lc). (Entered: 06/16/2025)
06/13/2025	13	NOTICE OF MOTION AND MOTION TO SHORTEN TIME TO HEAR PLAINTIFF'S MOTION TO REMAND 12 filed by plaintiff Matthew R. Walsh. (lc) Modified on 6/18/2025 (lc). (Entered: 06/16/2025)
06/13/2025	14	MOTION FOR LEAVE TO FILE DOCUMENTS ELECTRONICALLY AS AN IN PRO PER LITIGANT PURSUANT TO LOCAL RULE 5-4.1.1 IN THIS CASE filed by plaintiff Matthew R. Walsh. (lc) (Entered: 06/16/2025)
06/15/2025	4	NOTICE OF ASSIGNMENT to District Judge Otis D. Wright, II and Magistrate Judge Rozella A. Oliver. (car) (Entered: 06/15/2025)
06/15/2025	5	NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM filed. (car) (Entered: 06/15/2025)
06/15/2025	6	Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge. (car) (Entered: 06/15/2025)
06/15/2025	7	NOTICE OF PRO HAC VICE APPLICATION DUE for Non-Resident Attorney Emily Graue. A document recently filed in this case lists you as an out-of-state attorney of record. However, the Court has not been able to locate any record that you are admitted to the Bar of this Court, and you have not filed an application to appear Pro Hac Vice in this case. Accordingly, within 5 business days of the date of this notice, you must either (1) have your local counsel file an application to appear Pro Hac Vice (Form G-64) and pay the applicable fee, or (2) complete the next section of this form and return it to the court at cacd_atyadm@cacd.uscourts.gov . You have been removed as counsel of record

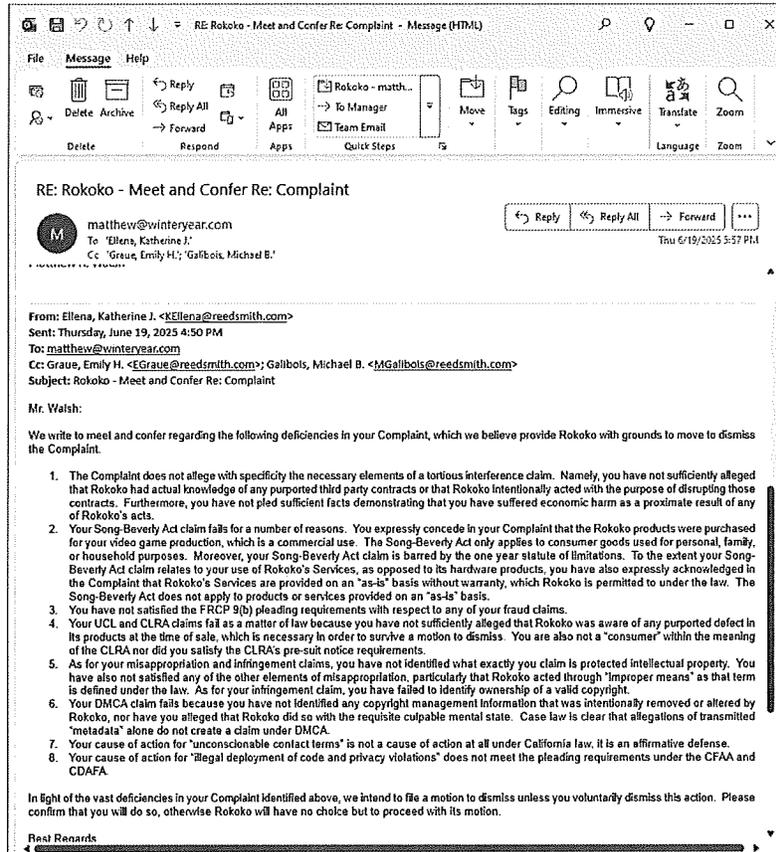
I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
 Plaintiff in pro per

EXHIBIT ZB

Defendant’s counsel once again adds unapproved attorneys Emily Graue and Michael Galibois to the e-mail chain after Plaintiff continues to remove them and references “we” continually implying there is still a group effort involving unauthorized practice of law.

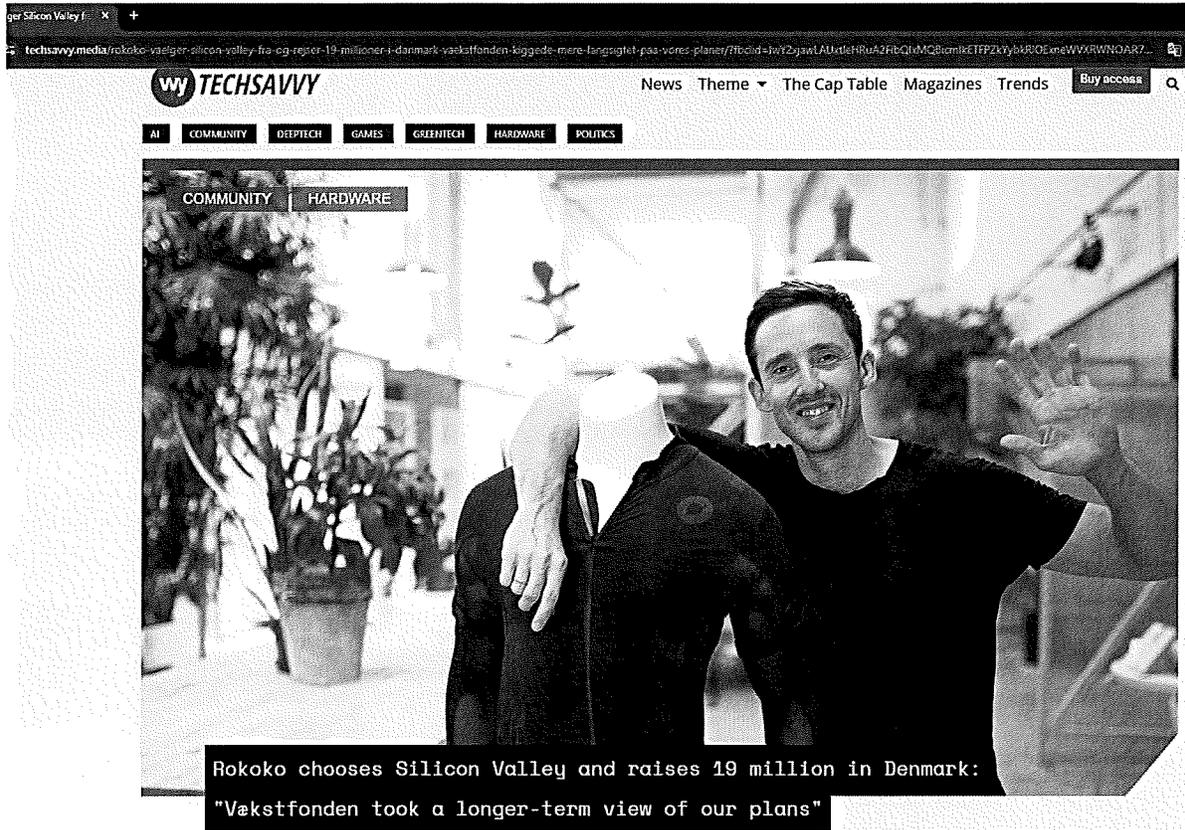


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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT ZC



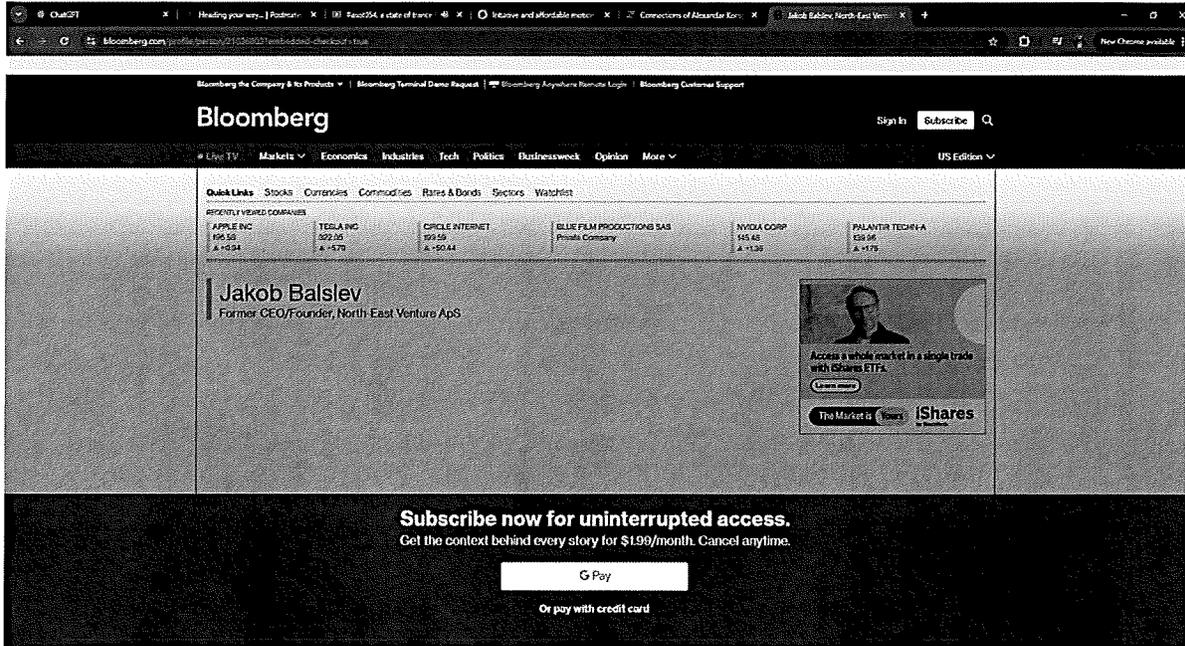
17 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
18 that this is a true and correct copy of a document I personally received, created, or obtained in
19 connection with this case, and it has not been materially altered.

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

21 

22
23 Matthew R. Walsh
24 Plaintiff in pro per

EXHIBIT ZD

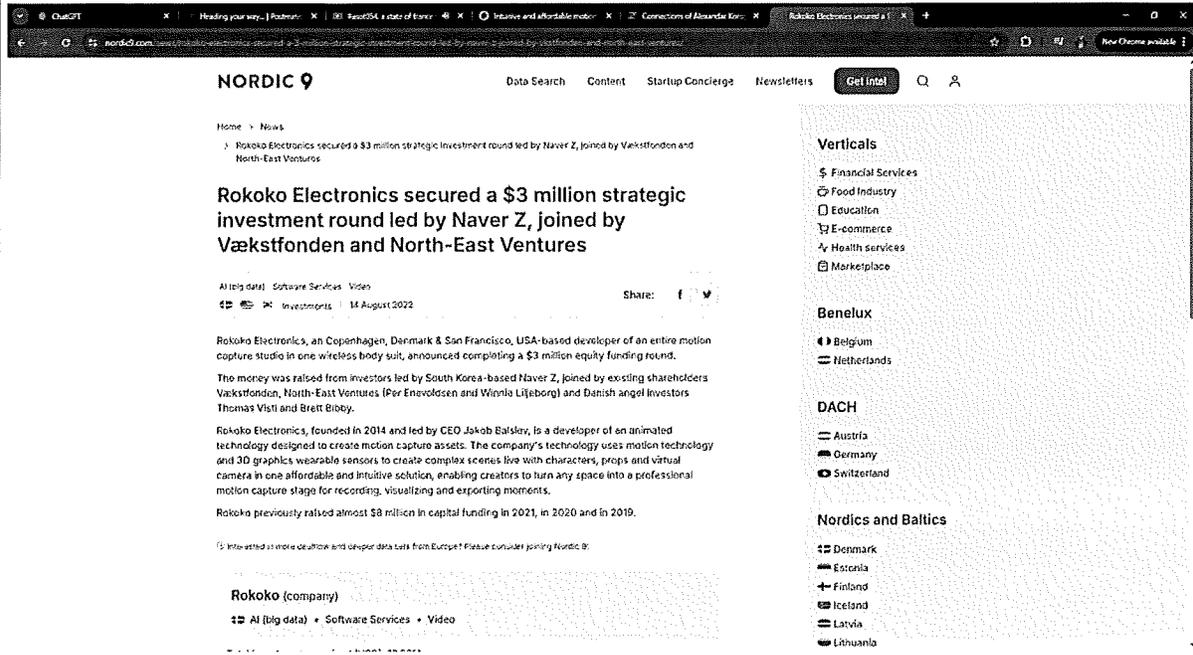


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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT ZE

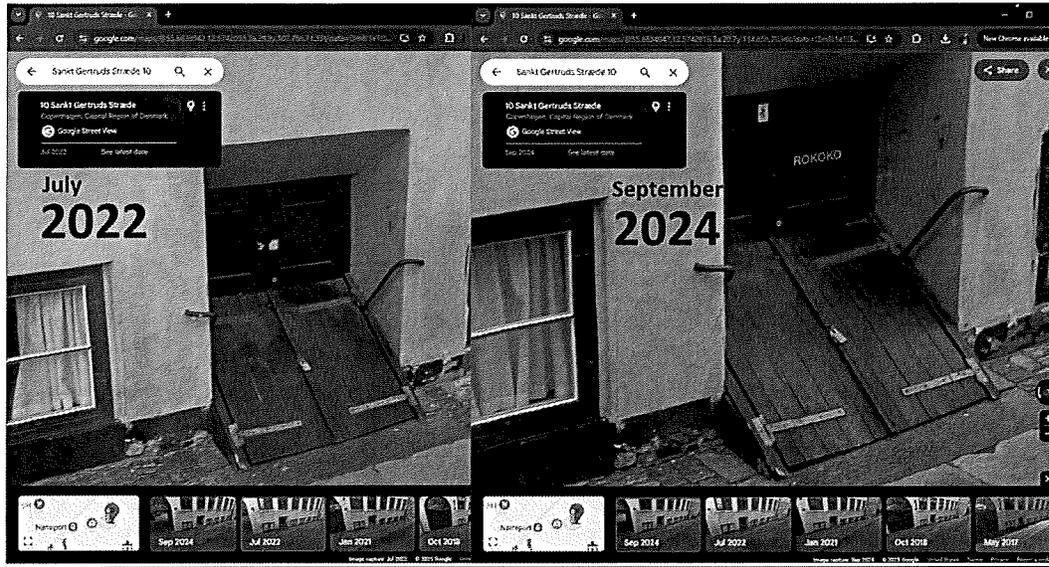


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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT ZF**



12 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
 13 that this is a true and correct copy of a document I personally received, created, or obtained in
 14 connection with this case, and it has not been materially altered.

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

16

17

18 Matthew R. Walsh
 19 Plaintiff in pro per

1 **EXHIBIT ZG**

2 **TC TechCrunch**

Latest Startups Venture Apple Security AI Apps | Events Po

3 have to animate characters, without having to use a specialized studio with
4 cameras that capture the movement, the suit itself tracks how the character
5 is moving and translates that into movements that animators can use to
animate their characters.

6 "We raised \$3m as it was primarily a strategic round to bring Naver Z in, and
7 then some of our previous investors wanted to follow up too," said Jonathan
8 Jeffery, director of growth at Rokoko, in an email. "We were profitable the
entirety of last year so didn't have too much pressure on our back to raise a
9 large round."

10 The funding round values Rokoko at over \$80 million, the company claims.
11 The round was led by Naver Z, and the two existing lead investors, VF Venture
12 and North-East Venture, both join the new round along with robotics
specialist Thomas Visti (Universal Robots, MiR) and investment from new
board member Brett Bibby.

13 "With this investment from Naver Z, we are joined by one of the strongest and
14 fastest moving metaverse companies in the world, and our plans to expand
15 our business into Asia just got supercharged," Rokoko CEO and co-founder
16 Jakob Balslev said in an email to TechCrunch. "Naver Z is planning to open its
Zepeto ecosystem to let animators monetize animations that they create
using tools like the ones Rokoko offers."

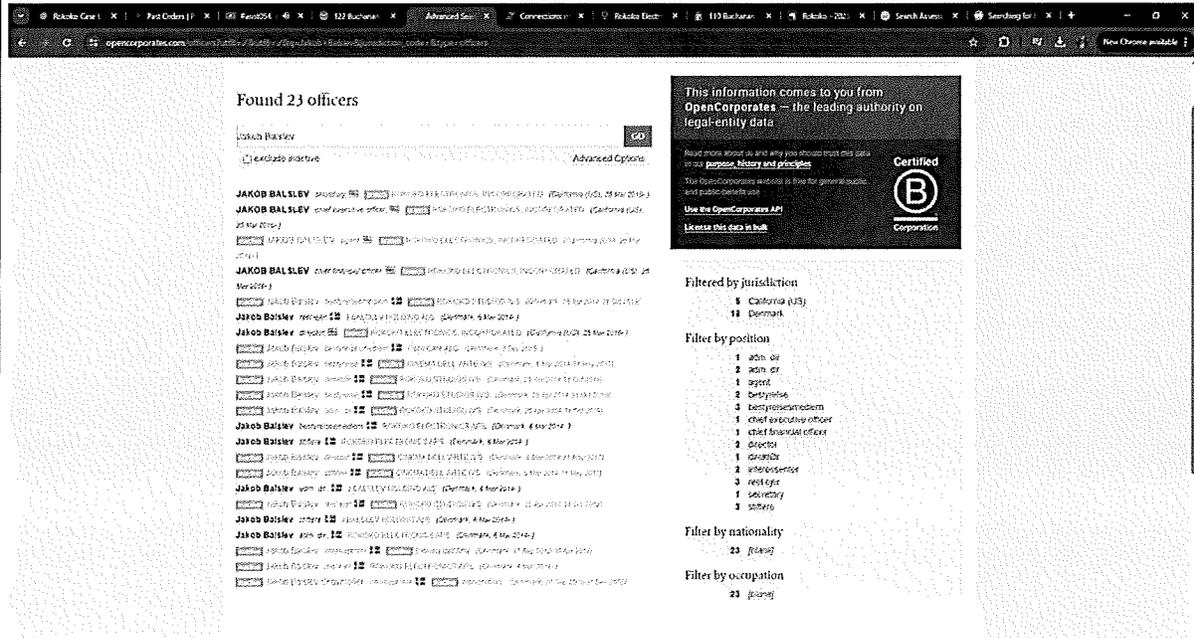
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20 Executed this 19 day of June, 2025 in Santa Clarita, California.

21 

22
23 Matthew R. Walsh
24 Plaintiff in pro per

1 **EXHIBIT ZH**



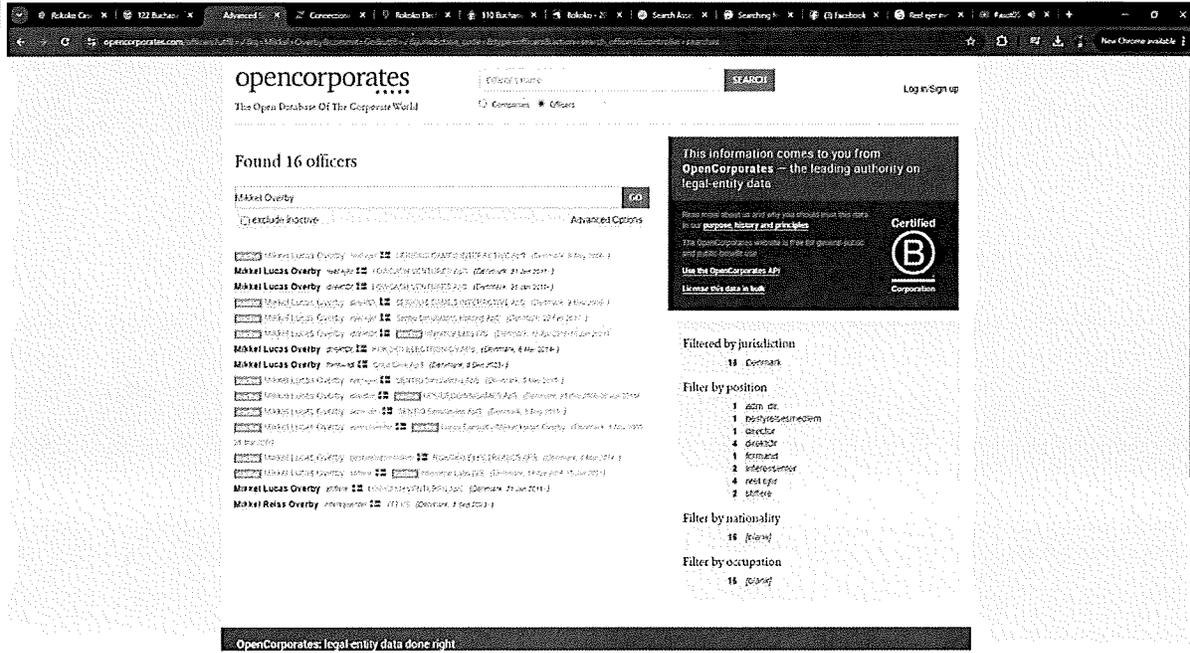
14 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
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16 connection with this case, and it has not been materially altered.

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

18 *Matthew R. Walsh*

19
20 Matthew R. Walsh
21 Plaintiff in pro per

EXHIBIT ZI



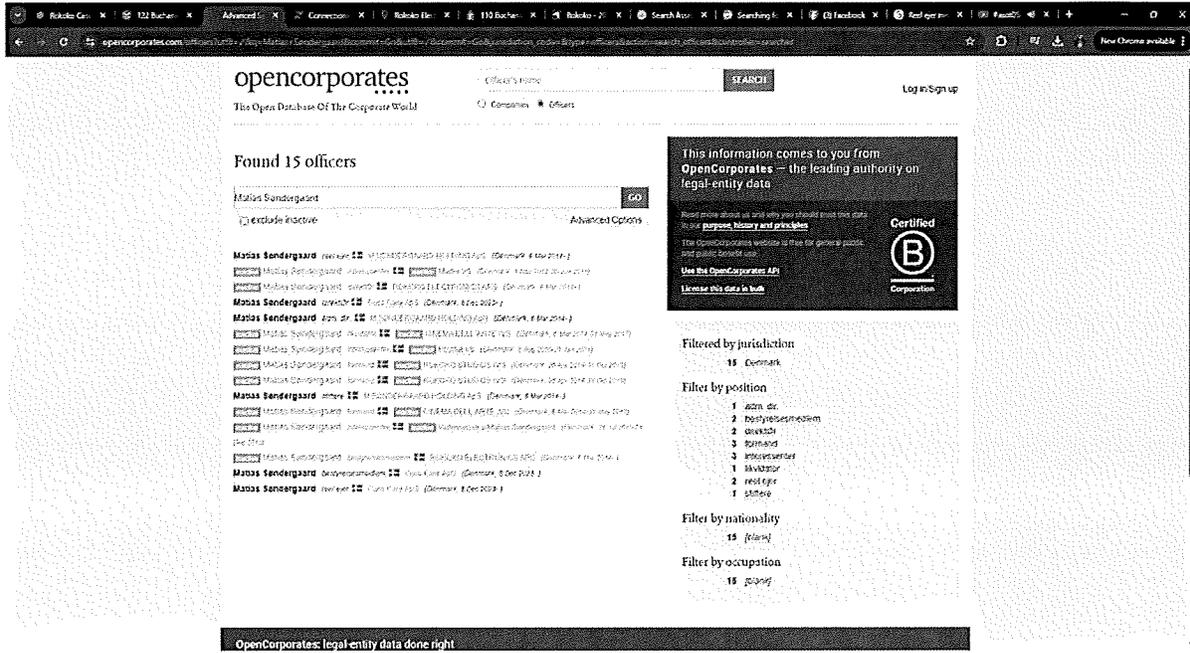
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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh

Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT ZJ**



14 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
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16 connection with this case, and it has not been materially altered.

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

18
19 

20 Matthew R. Walsh
21 Plaintiff in pro per

EXHIBIT ZK

RE: Rokoko - Meet and Confer Re: Complaint



matthew@winteryear.com
To: 'Ellena, Katherine J.'
Cc: 'Graue, Emily H.,' Galibois, Michael B.'

Reply Reply All Forward

Thu 6/19/2025 5:29 PM

You replied to this message on 6/19/2025 5:57 PM.

Best of luck arguing that in front of a judge.

Why are Micheel and Emily – once again – in this e-mail chain? What is their role in this? Please state it for the record.

Once again, I must ask: why are Michael and Emily still included on these communications? They are not admitted to this Court, and their repeated participation raises serious questions. What is their current role here?

Please state it clearly, for the record.

Given their ongoing involvement, I will be filing an objection and moving to have both of their pro hac vice applications denied on the basis of repeated unauthorized appearances and filings prior to proper admission.

Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Thursday, June 19, 2025 4:50 PM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: Rokoko - Meet and Confer Re: Complaint

Mr. Walsh:

We write to meet and confer regarding the following deficiencies in your Complaint, which we believe provide Rokoko with grounds to move to dismiss the Complaint.

1. The Complaint does not allege with specificity the necessary elements of a tortious interference claim. Namely, you have not sufficiently alleged that Rokoko had actual knowledge of any purported third party contracts or that Rokoko intentionally acted with the purpose of disrupting those contracts. Furthermore, you have not pled sufficient facts demonstrating that you have suffered economic harm as a proximate result of any of Rokoko's acts.
2. Your Song-Beverly Act claim fails for a number of reasons. You expressly concede in your Complaint that the Rokoko products were purchased for your video game production, which is a commercial use. The Song-Beverly Act only applies to consumer goods used for personal, family, or household purposes. Moreover, your Song-Beverly Act claim is barred by the one year statute of limitations. To the extent your Song-Beverly Act claim relates to your use of Rokoko's Services, as opposed to its hardware products, you have also expressly acknowledged in the Complaint that Rokoko's Services are provided on an "as-is" basis without warranty, which Rokoko is

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT ZL**

2
3 RE: Matthew R. Walsh v. Rokoko Electronics et al



4 matthew@winteryear.com
To 'Ellena, Katherine J.'; 'Valencia, Heather R.'
Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Thu 6/19/2025 5:21 PM

5 Actually, I'm saving the Court from a waste of judicial resources now and forthcoming by your firm.

6 Your suggestion that Plaintiff's contemplated motion to strike constitutes a "waste of judicial resources" is ironic, given the posture of this case.

7
8 It was your firm who elected to remove this matter to federal court while knowingly relying on two out-of-state attorneys who, at the time of filing, were neither admitted nor authorized to practice before this Court. In fact, neither Mr. Galibois nor Ms. Graue were properly added as attorneys of record until *after* their names appeared on signed pleadings — a procedural irregularity that this Court has already addressed via its notices.

9
10 Further, the jurisdictional basis for removal is facially defective. Your client is a California citizen for diversity purposes, and the individual defendants are Danish nationals, incapable of invoking 28 U.S.C. § 1332 as a matter of black-letter law. The removal was not only procedurally improper but factually indefensible.

11 If anything is taxing judicial resources, it is your client's continued attempts to stall adjudication through irregular filings, late pro hac vice applications, and ex parte motions that fail to address or acknowledge your team's procedural deficiencies.

12
13 Plaintiff is under no obligation to sit quietly while this Court's jurisdiction is misrepresented, or while unauthorized attorneys attempt to practice without leave. The contemplated motion to strike is not redundant — it serves to preserve the integrity of the judicial process, which your client (and you) appears determined to erode.

14 Also, why do you keep adding Michael and Emily to the e-mail chain? **They are not admitted counsel.** Are they continuing to work in a legal capacity for you? I am considering an inquiry.

15 I look forward to having the motion heard.

16 Thank you,
17 Matthew R. Walsh

18 From: Ellena, Katherine J. <KEllena@reedsmith.com>
19 Sent: Thursday, June 19, 2025 4:56 PM
20 To: matthew@winteryear.com; Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

21 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
22 that this is a true and correct copy of a document I personally received, created, or obtained in
23 connection with this case, and it has not been materially altered.

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

25

26 Matthew R. Walsh
27 Plaintiff in pro per

EXHIBIT ZM

RE: Matthew R. Walsh v. Rokoko Electronics et al



matthew@winteryear.com
To: 'Valencia, Heather R.'
Cc: 'Ellena, Katherine J.'

Reply Reply All Forward

Tue 6/17/2025 11:50 PM

You replied to this message on 6/19/2025 6:22 PM.

- PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO MOTION TO STRIKE.pdf
199 KB
- SUPPLEMENTAL DECLARATION IN SUPPORT OF PLAINTIFFS MOTION TO REMAND.pdf
3 MB

Hello Heather and Ellena,

I have removed Michael and Emily from the e-mail chain since they are not allowed to practice law in this state and have been removed from docket yet continue to communicate and appear on filed documents.

See attached for my opposition and again the supplemental declaration.

Both have been filed with the Court.

Thank you
Matthew R. Walsh

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT ZN

RE: Rokoko - Meet and Confer Re: Complaint



matthew@winteryear.com
To: 'Ellena, Katherine J.'
Cc: 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Thu 6/19/2025 5:57 PM

I keep asking this question:

Why are Michael and Emily – once again -- in this e-mail chain? What is their role in this? Please state it for the record.

But you wont answer it.

If I do not get an answer before your next e-mail to me, I will state to the court, as an admission of silence and conduce you are using them in your daily practices and will consider launching an inquiry and possibly a referral.

Thank you.
Matthew R. Walsh

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Thursday, June 19, 2025 5:29 PM
To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>
Cc: 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>
Subject: RE: Rokoko - Meet and Confer Re: Complaint

Best of luck arguing that in front of a judge.

Why are Michael and Emily – once again -- in this e-mail chain? What is their role in this? Please state it for the record.

Once again, I must ask: why are Michael and Emily still included on these communications? They are not admitted to this Court, and their repeated participation raises serious questions. What is their current role here?

Please state it clearly, for the record.

Given their ongoing involvement, I will be filing an objection and moving to have both of their pro hac vice applications denied on the basis of repeated unauthorized appearances and filings prior to proper admission.

Matthew R. Walsh

From: Ellena, Katherine I. <KEllena@reedsmith.com>

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT NO

Statement of Information - 7/10/2024

Statement of Information - 8/23/2023

Amendment Type	Field Name	Changed From	Changed To
Statement of Information	Annual Report Due Date	3/31/2023 12:00:00 AM	3/31/2024 12:00:00 AM
Control ID	CRA Changed	JAKOB BALSLEV 4140 CESAR CHAVEZ STREET SAN FRANCISCO, CA 94131	CORPNET, INCORPORATED 31416 AGOURA RD STE 118 WESTLAKE VILLAGE, CA 91361

Date: 8/23/2023

System Amendment - SOS Revivor - 6/21/2022

System Amendment - SOS Forfeited - 10/27/2021

System Amendment - Pending Suspension - 7/27/2021

System Amendment - Penalty Certification - SI - 5/11/2021

System Amendment - SI Delinquency for the year of 0 - 8/25/2020

System Amendment - Penalty Certification - SI - 7/25/2018

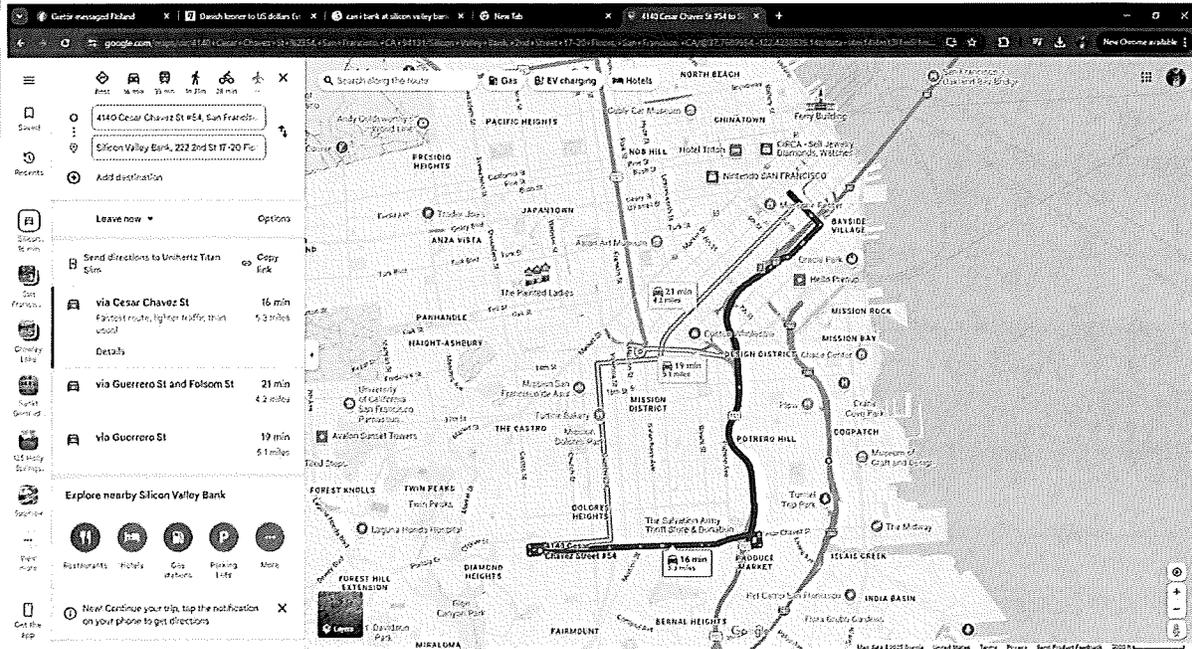
System Amendment - SI Delinquency for the year of 0 - 4/26/2018

I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

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

Matthew R. Walsh
Plaintiff in pro per

1 **EXHIBIT NP**



14 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
15 that this is a true and correct copy of a document I personally received, created, or obtained in
16 connection with this case, and it has not been materially altered.

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

18 

19 Matthew R. Walsh
20 Plaintiff in pro per

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 **SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF**
7 **PLAINTIFF'S MOTION TO REMAND**

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.

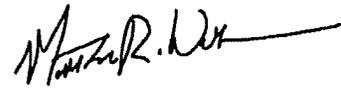
16 515 South Flower Street, Suite 4300

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
25
26
27
28