

**ORIGINAL**

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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-RAO

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

19 **MEMORANDUM OF POINTS AND AUTHORITIES**

20 **IN SUPPORT OF PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S**

21 **NOTICE OF REMOVAL AND ALL SUBSEQUENT FILINGS - IN LIEU OF**

22 **MOTION TO REMAND**

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25 **1. INTRODUCTION**

26 This is not a case of procedural error — this is a deliberate abuse of the federal court's  
27 jurisdictional mechanisms. Defendant's Notice of Removal was filed by unlicensed  
28

1 counsel, based on knowingly false declarations, in an effort to derail adjudication of an  
2 already-pending Motion for Summary Judgment in state court. Defendant misrepresented  
3 material facts to this Court, laundered corporate identity, and used shell companies under  
4 its own control to fabricate jurisdictional standing. The Court must strike the removal as  
5 void ab initio, and deny all protections otherwise afforded under remand.  
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8 **2. LEGAL STANDARD**

9 Under **28 U.S.C. § 1447(c)**, “[i]f at any time before final judgment it appears that the  
10 district court lacks subject matter jurisdiction, the case shall be remanded.”  
11

12  
13 3. Filings that are fraudulent, unauthorized, or executed by persons lacking standing are  
14 void from inception. **Fed. R. Civ. P. 11(b)** and **L.R. 83-2.1.1, L.R. 83-2.1.4** prohibit the  
15 unauthorized practice of law and impose a nondelegable duty of accuracy and candor on  
16 attorneys of record.  
17

18  
19 4. Courts have **inherent authority** to strike filings, sanction misconduct, and remand  
20 matters where jurisdiction has been manufactured through fraud. (*Cf. Pavelic & LeFlore*  
21 *v. Marvel Ent. Grp.*, 493 U.S. 120 (1989)).  
22

23  
24 **5. ARGUMENT**

25 **Defendant’s Removal is Legally Void Ab Initio**  
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27  
28

1 a. The Notice of Removal was filed by **Michael Galibois**, who:

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3 i. Was not admitted pro hac vice;

4  
5  
6 ii. Was not admitted by local counsel;

7  
8 iii. Was the only attorney listed in the initial filing header;

9  
10 iv. Did not personally sign the document, another unknown individual signed  
11 on his behalf. This alone invalidates the removal under **Rule 11, L.R. 83**,  
12 and controlling precedent. (**Pavelic & LeFlore**, *supra*).

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14  
15 v. Further, unauthorized attorneys continued to appear post-removal  
16 (Exhibits T, U, V, X.1, X.2), in defiance of rules requiring court approval  
17 prior to participation.  
18

19  
20 b. **There Is No Subject Matter Jurisdiction**

21 Defendant's removal was predicated on false claims of diversity under **28 U.S.C.**  
22 **§ 1332**. Those claims collapse under scrutiny:

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25 i. **Corporate Nerve Center Lies:**

26 Rokoko falsely declared its principal place of business is in Denmark. But  
27 evidence shows it was not only established in, but operates entirely out of  
28

1 San Francisco, California — where its founders reside, homes are owned,  
2 bank accounts are held, and executive control is exercised. (Exhibits A–Q)

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4  
5 **ii. Individual Citizenship Lies:**

6 None of the individual defendants are U.S. citizens, they are Danish  
7 citizens. Under *Newman-Green v. Alfonzo-Larrain*, 490 U.S. 826 (1989),  
8 foreign nationals without U.S. citizenship cannot be diverse parties. This  
9 is fatal.

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11  
12 **iii. LLC Membership Concealment:**

13 Defendant concealed the existence of a second Delaware entity —  
14 *Rokoko, LLC* — with overlapping control. Under *Strotek Corp. v. Air*  
15 *Transp. Ass'n of Am.*, 300 F.3d 1129 (9th Cir. 2002), this makes Rokoko a  
16 citizen of **every** state its members reside in, including California.

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18  
19 **iv. Alter Ego Fraud — Jurisdiction Was Manufactured**

20 Plaintiff has already pled **Alter Ego** in the Complaint and Summary  
21 Judgment filings. The facts support it:

- 22  
23  
24 1. Defendant funneled money from itself, through **North-East**  
25 **Venture**, a company it also controls.

1 2. That money was reinvested into **Rokoko Electronics**, falsely  
2 representing it as third-party capital.

3  
4  
5 3. These fabricated “investments” were used to deceive the Danish  
6 government (*Vækstfonden*) and U.S. investors like **Naver Z**,  
7 securing \$95M+ in combined funding (Exhibits ZE, ZC, ZD, ZG).

8  
9 4. The company even affixed a "**ROKOKO**" sticker to a basement  
10 **door in Denmark** after the fact to retroactively justify  
11 jurisdictional lies in the event someone from the Danish  
12 government was in the neighborhood. (Exhibit ZF)

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14  
15 v. This shell game directly undermines jurisdiction, corporate legitimacy,  
16 and the rule of law.

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18  
19 c. **This Was A Strategic Misuse of Removal to Derail State Court Summary**  
20 **Judgment**

21 Defendant ignored service for over 60 days, failed to appear in state court, and  
22 filed removal only at the **11th hour**, on the 30th day — knowing Plaintiff had  
23 already filed for Summary Judgment. The timing, conduct, and fraud combine to  
24 reveal **bad faith**.  
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28

1       **6. RELIEF REQUESTED:**

2       Plaintiff respectfully requests that this Court:

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- 4                   1. **STRIKE** the Notice of Removal as **void ab initio**, not merely remand;
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- 6
- 7                   2. **STRIKE ALL FEDERAL FILINGS** by unauthorized or unlicensed counsel;
- 8
- 9                   3. **REMAND IMMEDIATELY** to California Superior Court with loss of tolling
- 10                   protections;
- 11
- 12
- 13                   4. **DENY Pro Hac Vice Applications** due to unauthorized practice of law (Rule
- 14                   12(b));
- 15
- 16                   5. **DISQUALIFY Defense Counsel** under Rules of Professional Conduct and
- 17                   **People ex rel. Dept. of Corps. v. Speedee Oil**, 20 Cal.4th 1135 (1999);
- 18
- 19
- 20                   6. **AWARD FEES & COSTS** under **28 U.S.C. § 1447(c)**;
- 21
- 22
- 23                   7. **IMPOSE SANCTIONS** under **Rule 11** and the Court's **inherent authority**.

24

25       **7. CONCLUSION**

26       This is not a dispute over technicalities — this is a clear attempt to abuse corporate

27       structuring, alter-ego's and federal jurisdiction to avoid a reckoning in state court.

28

1 Defendant has misled two sovereign courts, fabricated corporate structures, used  
2 unlicensed attorneys, and committed acts that rise beyond civil misconduct. This Court  
3 has the power — and the obligation — to stop it. I beg you to do so, for the sake of  
4 bringing justice to the evidence-rich and uncontested allegations against Defendant they  
5 seek so desperately to escape.  
6

7  
8 Executed this 19th day of June, 2025, in Santa Clarita, California.  
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13 Matthew R. Walsh  
14 Plaintiff In Pro Per  
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3 **PROOF OF SERVICE**

4 I, Matthew R. Walsh, declare:

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

7 On June 19, 2025, I served the following document(s):

8 **PLAINTIFFS MOTION TO STRIKE DEFENDANTS REMOVAL**

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

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

11 Heather Valencia, Esq.

12 Hvalencia@reedsmith.com

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

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

16 Heather Valencia, Esq.

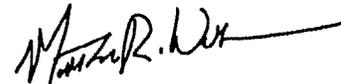
17 515 South Flower Street, Suite 4300

18 Los Angeles, CA 90071

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

21 Executed on June 19, 2025

22 Santa Clarita, California



23 \_\_\_\_\_  
24 Matthew R. Walsh  
25 Plaintiff In Pro Per  
26  
27  
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