

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-05340-ODW-RAO *x*

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

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

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 REMAND**. I have personal knowledge of the facts
24 set forth herein and, if called to testify, could and would competently do so.
25
26
27
28

1
2 **2. DEFENDANTS REMOVAL WAS BASED ON MATERIALLY FALSE**
3 **STATEMENTS THEIR COUNSEL WAS AWARE OF**

4 Defendant, and their Counsel, made knowingly false statements under the penalty of
5 perjury to this Court. This included a statement by Mikkel Overby, the CEO and CFO of
6 both Defendant and the planned-DOE Amendment “Rokoko Care” (mentioned in the
7 Complaint, MSJ and numerous other filings.)

- 8 3. That absolutely false statement made under penalty of perjury, produced under counsels
9 instruction stated:

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

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

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

20
21 **4. DEFENDANT IS A CITIZEN OF CALIFORNIA AND ALWAYS WAS, EVEN**
22 **PRIOR TO BECOMING “ROKOKO ELECTRONICS”**

23 Before Defendant was Rokoko Electronics, they were “Salto” a motion capture startup
24 based in San Francisco (Exhibit A, E).

- 25 5. On or about June 4, 2015 Defendant makes an express admission from the Rokoko
26 Facebook page that both CEO’s/Founders created a US Subsidiary Company in San
27 Francisco *“We’re in San Francisco and just established our US subsidiary company with*
28

1 *our new and very tall US lawyer David Raynor. It is VERY exciting! More updates from*
2 *San Fran coming up— with Matias Søndergaard and Jakob Balslev.”* (Exhibit F)

- 3
- 4 6. Between about September 18, 2015 – September 24, 2025, Defendant’s CEO came to
5 San Francisco to promote their product and launch their campaign with TechCrunch; a
6 global technology news powerhouse (Exhibit D, D.1)
- 7
- 8 7. On or about September 22, 2015 Defendant’s CEO posts “*from (sic)very early morning*
9 *here in San Fran”* while referencing his new startup Salto which was renamed to Rokoko
10 soon after. (Exhibit E)
- 11 8. Sometime after, Defendant moved into an apartment at 4140 Cesar Chevez Street Apt 52,
12 San Francisco, CA 94131.
- 13
- 14 9. In 2016, Defendant’s CEO purchased a home in San Francisco at 1484 Sanchez, San
15 Francisco, CA while admitting he has no return ticket to Denmark (Exhibit B)
- 16
- 17 10. On or about December 11, 2016 Defendant (and their locally domiciled CEO) won
18 \$100,000 USD at the Hollywood Entertainment Technology Festival. (Exhibit G)
- 19
- 20 11. On or about May 9, 2017 Defendant celebrated his wives birthday in San Francisco
21 stating that the Rokoko motion capture suit had been featured in Wired Magazine; written
22 by a San Francisco/Oakland reporter (Exhibit H).
- 23
- 24 12. In 2019, Defendant’s CEO moved into a larger home since he had an American son in
25 2018, he had placed an open house ad on Craigslist (Exhibit C). The new home address is
26 122 Buchanan Dr, Sausalito, CA 94965 and has a value of \$2,194,000 USD.
- 27
- 28 13. On or about August 26, 2022 Defendant received an investment of DK 600,000,000 from
 Naver Z, a multi-national investor also based in California at 5700 Wilshire Blvd, Los

1 Angeles, CA 90036. (Exhibit I). This is equivalent to \$92,361,000.00 today. Their
2 ownership stake in Rokoko further defeats diversity of citizenship. It raises the
3 company's valuation to \$80M. (Exhibit I.1)

4
5 14. On or about June 5, 2025 Defendant opened a U.S. warehouse, with inventory for the
6 U.S. market (Exhibit L, L.1)

7
8 **15. BOTH OF DEFENDANT'S FOUNDERS LIST SAN FRANCISCO AS THEIR
PLACE OF RESIDENCE ON SOCIAL MEDIA**

9 Defendant's CEO Jakob Balslev still today in 2025 lists his residence in San Francisco,
10 California (Exhibit J)

11
12 16. Defendant's co-founder Matias Sondergaard also states on social media that his residence
13 is San Francisco. (Exhibit K)

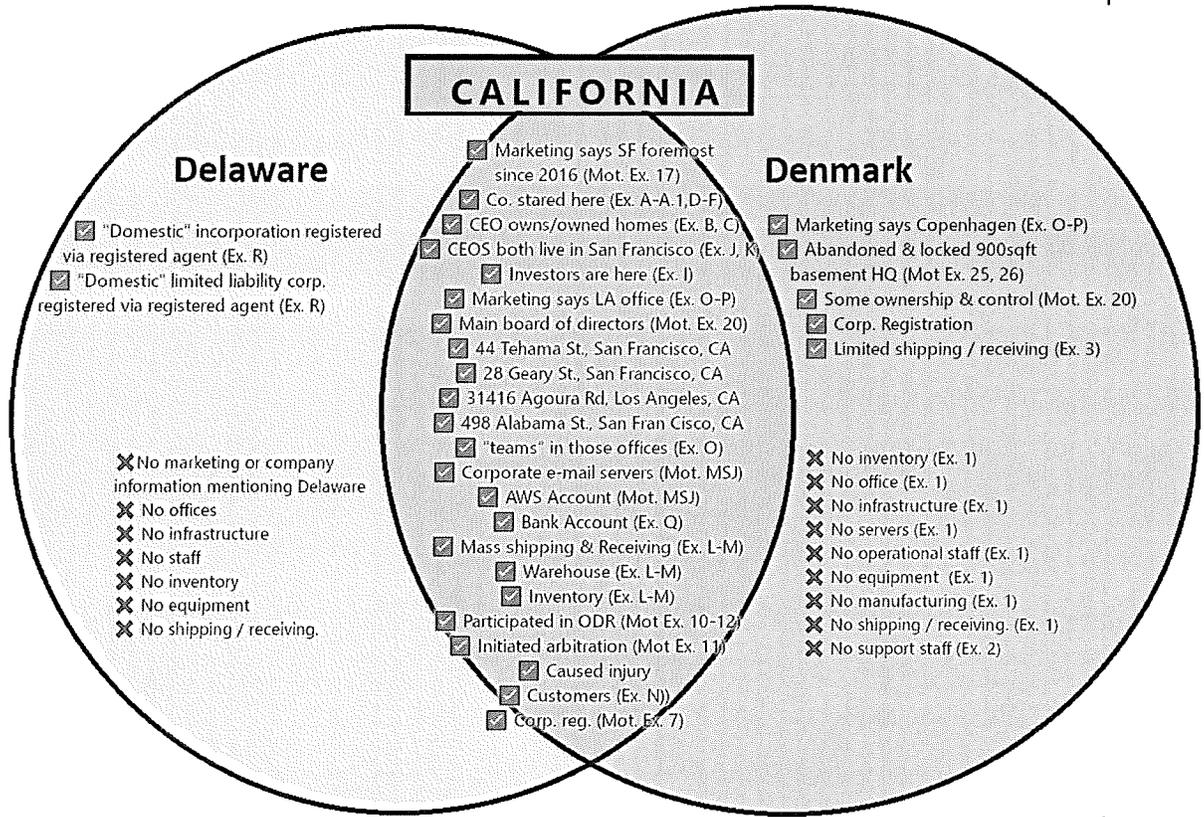
14
15 **17. DEFENDANT AND COUNSEL OMITTED KEY INFORMATION FROM THE
COURT WHICH CONTRADICTS THE STATEMENT BY MIKKEL OVERBY**

16 Defendant created two distinct domestic vehicles to serve different liability and tax
17 purposes at their behest in Delaware (Exhibit R: (a) Rokoko Electronics, Inc. (#5755632,
18 filed 5/28/2015). and (b) Rokoko, LLC (#6007440, filed 4/4/2016). Defendant is
19 willfully omitting it's more recently established Delaware LLC in the removal notice to
20 conceal it's true citizenship and manufacture diversity of citizenship/jurisdictional issues:

21
22 *Section 1332(c) provides that "a corporation shall be deemed to be a citizen of every
23 State and foreign state by which it has been incorporated and of the State or foreign state
24 where it has its principal place of business."*

25
26 *"We therefore join our sister circuits and hold that, like a partnership, an LLC is a
27 citizen of every state of which its owners/members are citizens." (Strotek Corp. v. Air
28 Transp. Ass'n of Am., 300 F.3d 1129, 1133 n. 2 (9th Cir.2002))*

18. **DEFENDANT IS MORE CALIFORNIA THAN DENMARK AND DELAWARE COMBINED**



19. The visual aid unequivocally and without question shows California is and always was Defendant's principal place of business, and domicile and satisfies (Hertz Corp. v. Friend).

20. Defendant offers USA-first payment plan options on their website (Exhibit M)

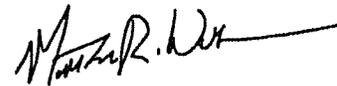
1 21. Defendant's core customer base is multi-billion dollar California based corporations
2 (Exhibit N), no mention of any notable customers in Delaware or Denmark.

3
4
5 22. Defendant doesn't mention Delaware on their site or any marketing materials as a base of
6 operations or office location, implying it's merely a liability/tax haven shell (Exhibit O,
7 O.1, P).

8
9
10 23. Defendant still has a Santa Clara, CA based bank account; in which the Corporation
11 established through 'Silicon Valley Bank' (Exhibit Q).

12
13 I declare under penalty of perjury under the laws of the United States that the foregoing is true
14 and correct.

15
16 Executed this 17th day of June, 2025, in Santa Clarita, California.

17
18 

19
20 _____
21 Matthew R. Walsh
22 Plaintiff In Pro Per
23
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25
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28

1 **EXHIBIT A**

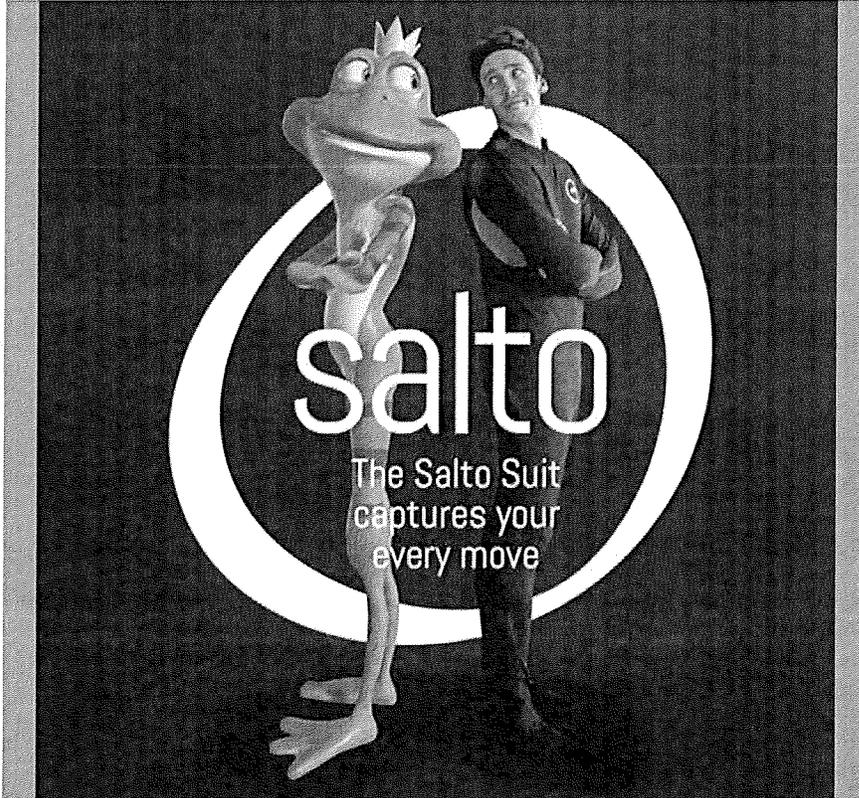


2 Jakob Balslev
3 September 9, 2015 · 🌐

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



9 5 comments 2 shares

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20
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 16 day of June, 2025 in Santa Clarita, California.

25

26 Matthew R. Walsh
27 Plaintiff in pro per

EXHIBIT B

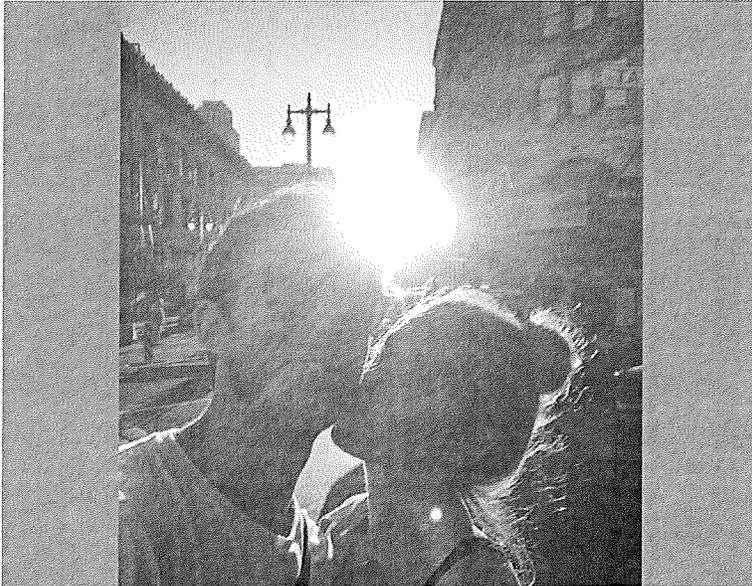


Jakob Balslev is with Moe Brandl in Hayes Valley. September 27, 2016 · 🌐

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

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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

EXHIBIT D



Jakob Balslev
September 18, 2015 · 🌐

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

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

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Matthew R. Walsh
Plaintiff in pro per

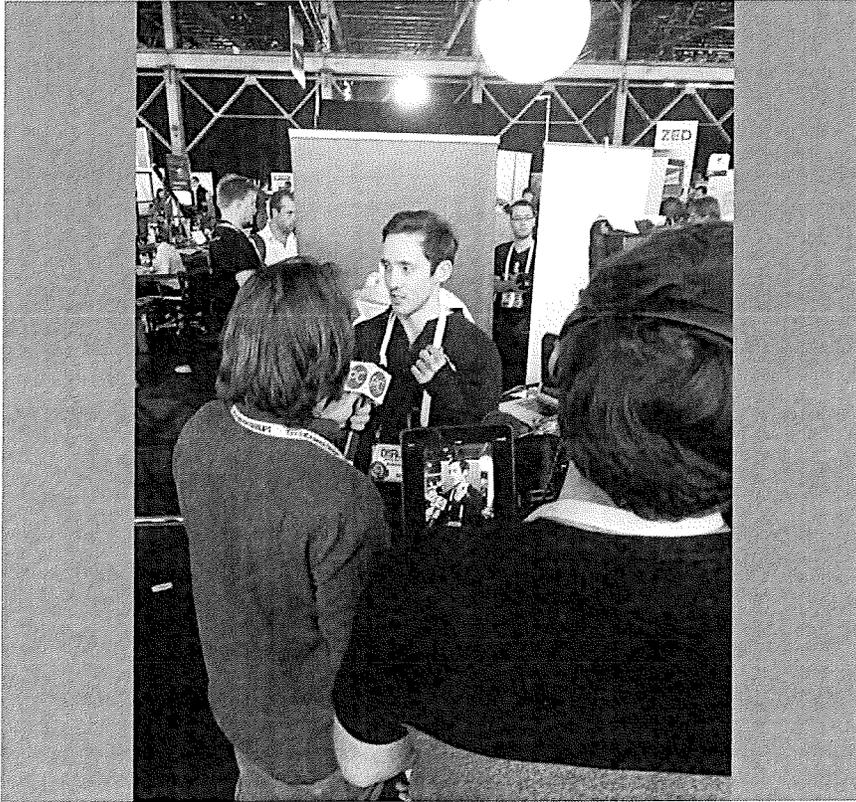
1 **EXHIBIT D.1**



2 Rokoko is with Jakob Balslev.
September 24, 2015 · 🌐

...

3 3 crazy days at TechCrunch Disrupt have ended! We are exhausted but extremely happy. Exciting
4 times ahead! Follow @salto3d on Twitter and our Kickstarter Campaign at goo.gl/V7pfoa



18 Like

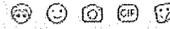
19 Comment

Send

Share



20 Comment as Matthew Walsh



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24
25

26 Matthew R. Walsh
27 Plaintiff in pro per

EXHIBIT E



Jakob Balslev
September 22, 2015 · 🌐

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

🌟 · See original · Rate this translation



Rokoko
September 22, 2015 · 🌐

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

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT F

Rokoko
June 4, 2015 · 🌐

We're in San Francisco and just established our US subsidiary company with our new and very tall US lawyer David Raynor. It is VERY exciting! More updates from San Fran coming up— with Matias Søndergaard and Jakob Balslev.



🌐 3 comments

👍 Like 💬 Comment 📧 Send ➦ Share

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT G



Jakob Balslev

December 11, 2016 · 🌐

...

Two weeks ago Rokoko won first prize and the \$100K award at Hollywood Entertainment Technology Festival in LA against more than 200 other companies. What a feeling!



24 comments 1 share

👍 Like

💬 Comment

📧 Send

➦ Share

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT H



Jakob Balslev
May 9, 2017 · 🌐

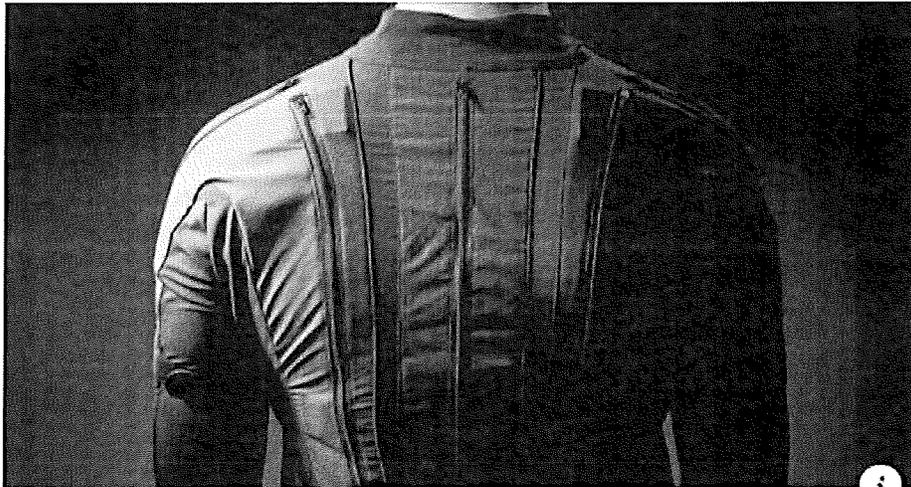
...

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



Rokoko
May 9, 2017 · 🌐

"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



WIRED.COM

The Rokoko Smartsuit Brings Motion Capture to the Masses

The \$2,500 device makes motion capture as easy as suiting up.



8 comments

👍 Like

💬 Comment

📧 Send

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Matthew R. Walsh
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.

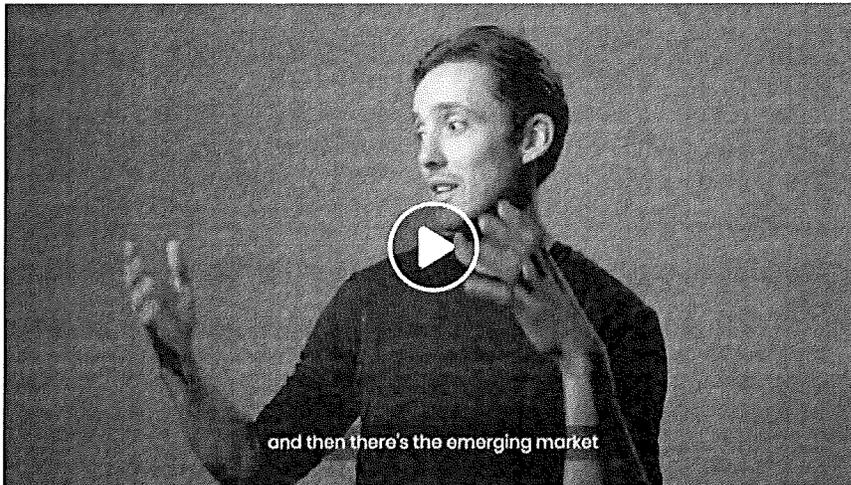
Den nye investeringsrunde værdisætter Rokoko til knap 600 million DKK. Godt gået Jakob Balslev, Matias Søndergaard og Anders Klok Sander ! Vi glæder os til at følge og støtte jeres videre eventyr.

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 Denmarks 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

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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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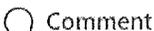
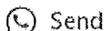
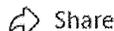
14

15

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

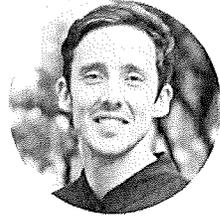
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23 Executed this 16 day of June, 2025 in Santa Clarita, California.

24 

25
 26 Matthew R. Walsh
 27 Plaintiff in pro per

EXHIBIT J



Jakob Balslev

1.3K friends

Posts About Friends Photos Videos Check-ins More

Intro

- 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
- rokoko.com

Posts

 **Jakob B.**
January 1
The best video
at Freethink



Photos

See all photos



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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

What's happening

-  **Giants at Dodger**
1 hour ago

Love Island USA · Trending
#LoveIslandUSA

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

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.

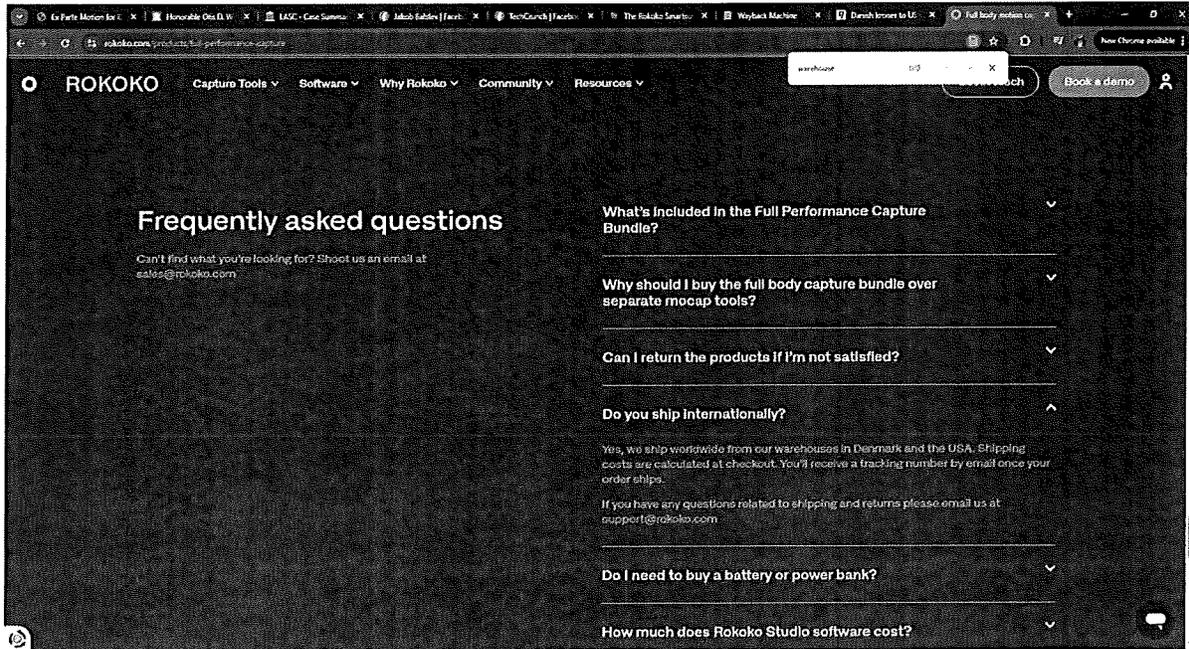
Now, it's time to check out two amazing workflows in MetaHuman and Unity + a beautiful animation that tells a heartbreaking story

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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT L.1

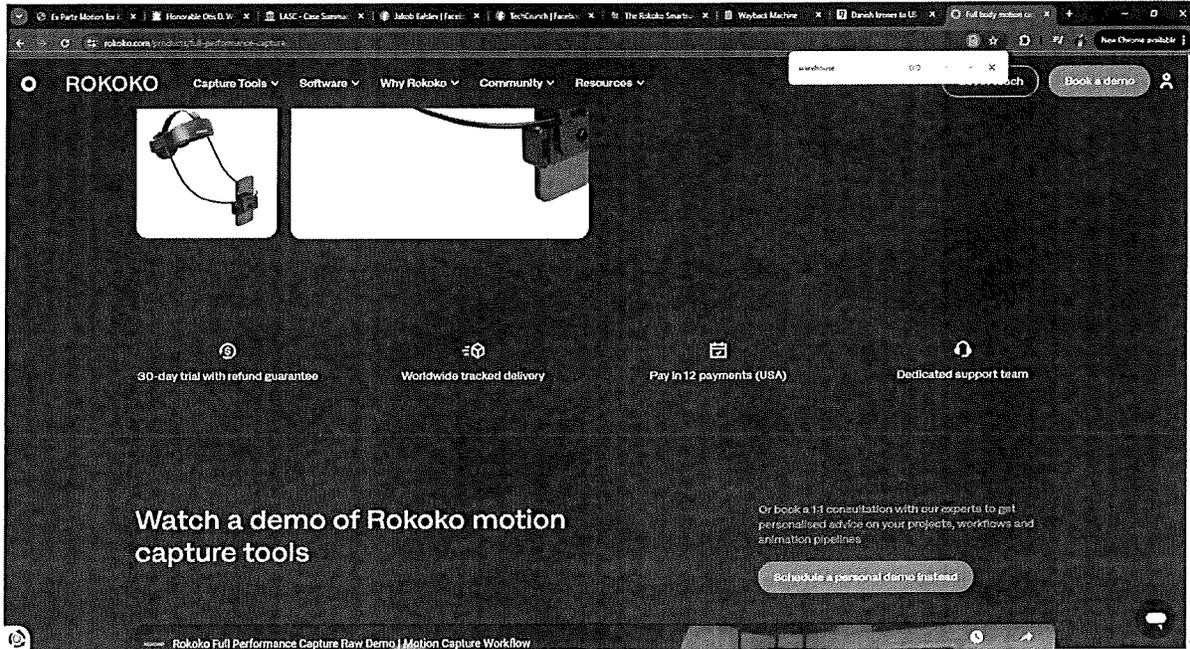


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EXHIBIT M

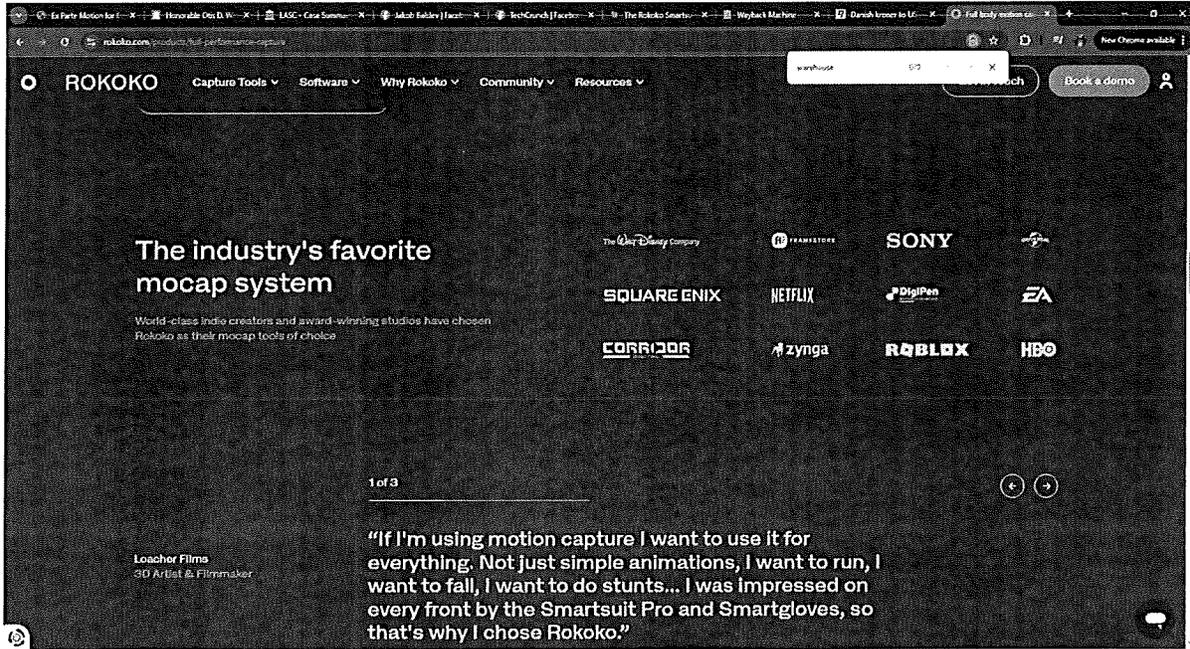


I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

Executed this 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT N

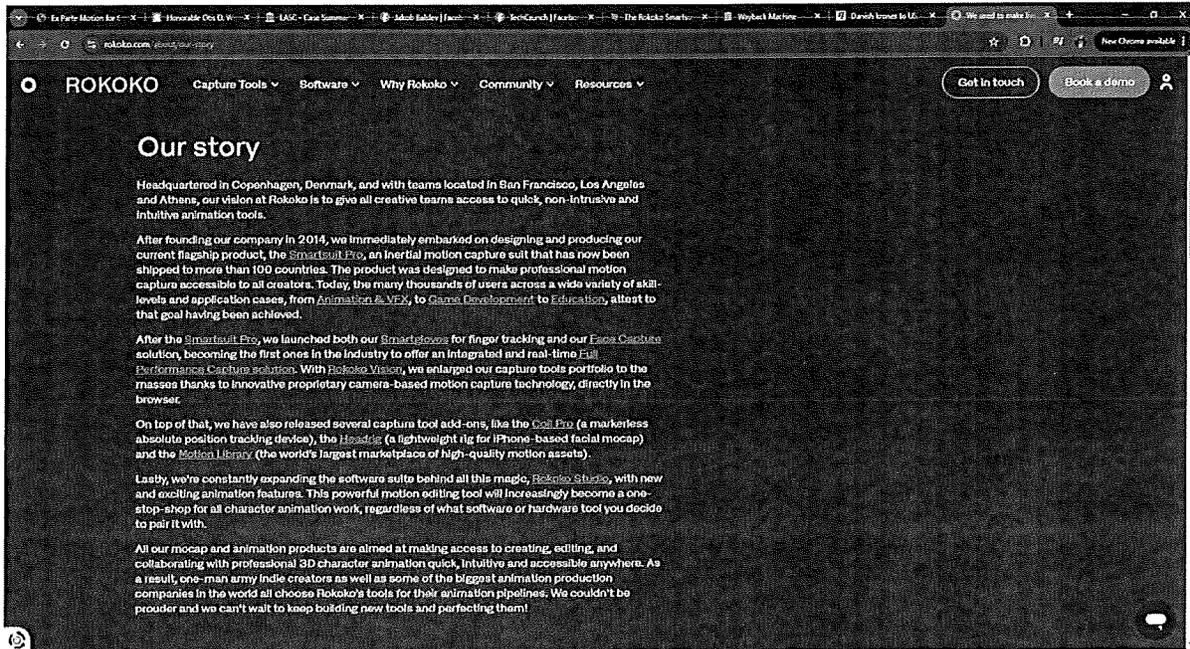


I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

Executed this 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT O

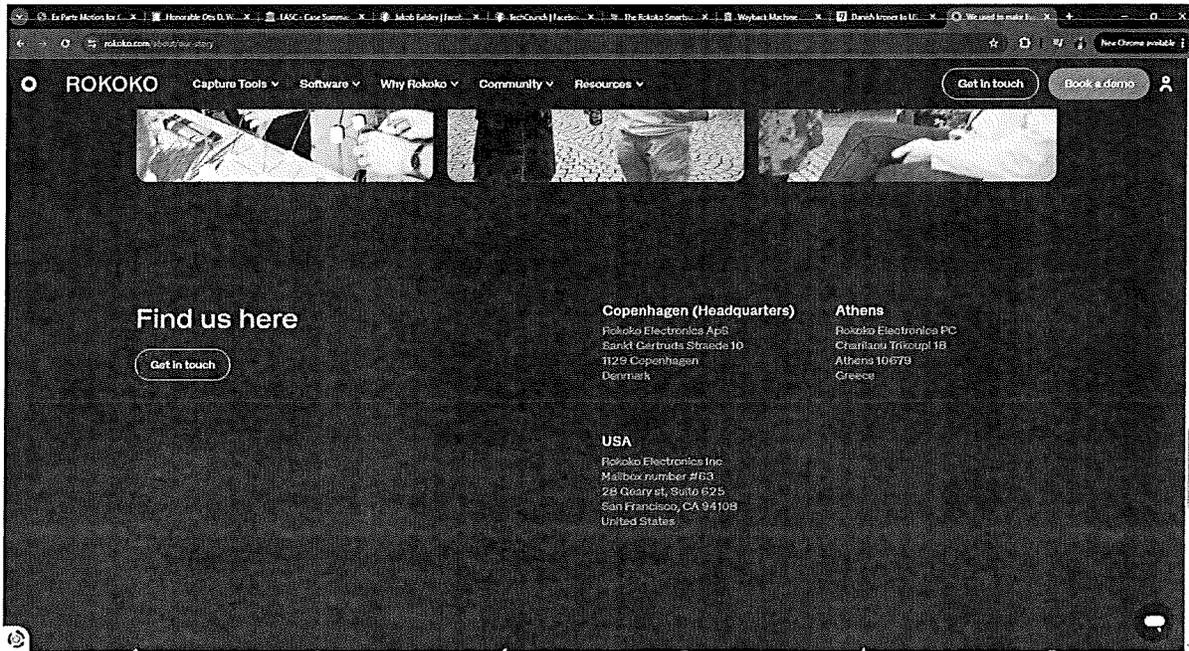


I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

Executed this 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT P



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 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT Q

Your Rokoko Quote #D2465



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

Reply Reply All Forward

Tue 4/15/2025 2:18 AM

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

Right-click or tap and hold to download pictures

QUOTE #D2465

Accept your quote

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

Account name: Rokoko Electronics

Silicon Valley Bank, 3003 Tasman Drive, Santa Clara, CA 95054

ABA: 121140399

Account: 3301333454

SWIFT: SVBKUS6S

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

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

[Accept your quote](#)

or Visit our store

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 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT R



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 16 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
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.

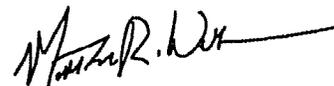
16 515 South Flower Street, Suite 4300

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