

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



Plaintiff In Pro Per,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MATTHEW R. WALSH
19197 GOLDEN VALLEY RD #333
SANTA CLARITA, CA 91387,

Plaintiff In Pro Per,

vs.

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

Defendant

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

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

**PLAINTIFFS REQUEST TO ENTER
DEFAULT**

Hearing date: TBD
Hearing time: TBD
Hearing place: Dept. 5D

[Concurrently filed with Declaration of
Matthew R. Walsh]

State Court Action Filed: May 12, 2025
Removal Date: June 12, 2025
Trial Date: None

PLAINTIFFS REQUEST TO ENTER DEFAULT

TO THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff respectfully requests that the
Clerk enter default against Defendant Rokoko Electronics.

1
2 The Court ordered that – even after giving a 3 day addition of time -- Defendant respond
3 to the Complaint by June 26, 2025 (Dkt. 25). Defendant did not file an Answer.
4

5
6 Defendant filed a Motion to Dismiss (Dkt. 42, 43) on June 26, 2025 — the same day the
7 parties held the required L.R. 7-3 meet and confer. Under the Central District’s Local Rule 7-3,
8 the conference must take place **at least** seven (7) days before filing. As the motion was filed in
9 direct violation of this rule, it is procedurally defective and cannot operate to toll the responsive
10 pleading deadline under Fed. R. Civ. P. 12(a)(4) or 81(c).
11

12
13 This Court has already enforced this exact rule multiple times in this action. On June 23,
14 2025, the Court struck several of Plaintiff’s motions for the same violation of L.R. 7-3 (Dkt. 39)
15 stating “*conference held less than seven days prior to filing of the motion.*”
16

17
18 Because no valid responsive pleading or motion was filed by the June 26 deadline,
19 Plaintiff respectfully requests that the Clerk enter default against Defendant pursuant to Rule
20 55(a). Plaintiff does not seek default judgment. He seeks to strike the removal and remand back
21 to state Court so that Defendant may face the motion for summary judgment pending.
22

23
24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct.
26

27 Executed this 27 day of June, 2025 in Santa Clarita, California.
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Matthew R. Walsh
19197 Golden Valley Rd #333
Santa Clarita, CA 91387
matthew@winteryear.com
(661) 644-0012
Plaintiff in pro per

AND NOW, THIS DAY OF _____, ____, 2025 pursuant to request to enter default and affidavits
filed, default is hereby entered against Defendant for failure to plead or otherwise defend.

Central District Court Clerk

1 **DECLARATION OF MATTHEW R. WALSH RE: ENTRY OF DEFAULT**

2

3 1. Local Rule 7-3 states “*counsel contemplating the filing of any motion **must** first contact*

4 *opposing counsel to discuss thoroughly, preferably in person, the substance of the*

5 *contemplated motion and any potential resolution. **The conference must take place in***

6 ***person, by telephone, or via video conference at least 7 days prior** to the filing of the*

7 *motion.”*

8

9

10

11 2. No such conference ever took place prior (Exhibits A, E, F) until Plaintiff demanded it

12 (Exhibit C) on June 26, 2025. In fact, Defendant’s counsel Katherine J. Ellena, Esq.

13 admits it in her own declaration “*6. On June 26, 2025, I further met and conferred with*

14 *Plaintiff by telephone for more than one hour regarding the Motion.”*

15

16

17 3. Defendant’s Counsel further admits prior to June 26, 2025 was only an e-mail which is

18 not a valid method of conference under 7-3 “*4. In light of Plaintiff’s statement, on June*

19 *19, 2025, I sent an email to Plaintiff setting forth the bases for Rokoko’s Motion so as to*

20 *have a thorough, written record of Rokoko’s meet and confer efforts.”* (Exhibit B)

21

22

23 4. Defendant filed their response as a **Motion to Dismiss** on the same day of the conference.

24 Local Rule 7-3 and the judge specifically states “*7 days prior to the filing of*” (Exhibit A,

25 B)

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28

1 5. On June 23, 2025 - Hon. Judge Otis D. Wright II just days prior struck Plaintiff's motion
2 for the same defect of rule 7-3: "*MINUTES (IN CHAMBERS) by Judge Otis D. Wright,*
3 *II: ORDER STRIKING DOCUMENT. The Court reviewed Plaintiffs Motion to Strike*
4 *Defendants Notice of removal²⁹ . Missing statement of Conference of Counsel Prior to*
5 *Filing of Motions, or **conference held less than seven days prior to filing of the***
6 ***motion.***"

7
8
9 6. On June 13, 2025 - Hon. Judge Otis D. Wright II struck multiple of Plaintiff's motions
10 for the same 7-3 rule: "*Plaintiff's Motion to Remand and Motion to Shorten Time to Hear*
11 *the Motion to Remand fail to comply with **Local Rules 7-3***"

12
13
14 7. As this Court, with this Judge, in this Case ruled multiple times against Plaintiff for 7-3
15 violations, Defendant must be held to the same or higher standard. Defendant's motion to
16 dismiss as an answer to the Complaint is procedurally defective, they have therefore not
17 answered within the requisite time prescribed by this Court, nor the gracious 3-day
18 extension as ordered by this Court and as of June 27, 2025, **Defendant has not**
19 **answered, and is in default.**

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21
22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

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26 Executed this 27 day of June, 2025 in Santa Clarita, California.

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Matthew R. Walsh
19197 Golden Valley Rd #333
Santa Clarita, CA 91387
matthew@winteryear.com
(661) 644-0012
Plaintiff in pro per

1 However, that filing was procedurally defective and did not constitute a valid responsive
2 pleading or defense for purposes of avoiding default under Rule 55(a), because:

3
4 **It failed to comply with Local Rule 7-3 which requires: “*The conference must take place at***
5 ***least 7 days prior to the filing of the motion.*”.**
6

7
8 As Defendant has admitted and as Plaintiff has illustrated in his Request and Declaration,
9 Defendant filed the Motion To Dismiss within hours of the conference, making it procedurally
10 defective and does not constitute a valid responsive pleading under Rule 81(c) and Local Rule 7-
11 3 and therefore did not toll the answer deadline.
12

13
14 No valid answer, motion, or other qualifying response has been timely or properly
15 filed by Defendant as required under the Federal Rules of Civil Procedure. Defendant is not an
16 infant, incompetent person, or in active military service, based on my knowledge and belief.
17

18
19 Therefore, Plaintiff respectfully requests that the Clerk enter default against Defendant
20 pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.
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23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.
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Executed on this 27 day of June, 2025, at Santa Clarita, California.



Matthew R. Walsh
19197 Golden Valley Rd #333
Santa Clarita, CA 91387
matthew@winteryear.com
(661) 644-0012
Plaintiff in pro per

1 **DECLARATION OF MATTHEW R. WALSH**

2 **RE: REQUEST FOR ENTRY OF DEFAULT**

3
4
5 I, Matthew R. Walsh, declare: I am the Plaintiff. I have personal knowledge of the following
6 facts and, if called as a witness, I could and would testify competently thereto. I submit this
7 declaration in support of Plaintiff's Request for Entry of Default

- 8
9
10 1. **Exhibit A:** Call log screenshot showing a 71-minute and 46-second (1hr 11min) phone
11 call with Defendant's counsel on June 26, 2025 — the only procedurally valid meet and
12 confer held under Local Rule 7-3. The discussion covered both the Motion to Dismiss
13 and Plaintiff's anticipated Motion to Strike Removal.
- 14
15 2. **Exhibit B:** Excerpt from Defendant's own declaration acknowledging that the June 26,
16 2025 call was the first and only valid meet and confer. Prior communication consisted
17 solely of email, which does not satisfy Local Rule 7-3 under the 2025 version.
- 18
19
20 3. **Exhibit C:** Defendant made an admission that no resolution could be reached with
21 Plaintiff during the meet and confer. This statement implies that Defendant attempted
22 discussion, when in fact Plaintiff was the only party actively pushing for proper
23 compliance.
- 24
25
26 4. **Exhibit D:** Screenshot evidencing that Plaintiff sent over 50 emails between June 12 and
27 June 26, 2025, directly contradicting Defendant's claim that Plaintiff was
28

1 “uncooperative.”

2
3 5. **Exhibit E:** Carrier record showing that only one phone call was ever placed by Katherine
4 J. Ellena, occurring on the same day she filed the Motion to Dismiss — in violation of the
5 7-day meet and confer requirement.
6

7
8 6. **Exhibit F:** Carrier and call records showing only one short call from unadmitted counsel
9 Emily Graue, who was later removed from the docket. Plaintiff attempted contact three
10 separate times with no meaningful engagement. Even under the 2024 version of Local
11 Rule 7-3, this would not constitute a “thorough discussion.”
12

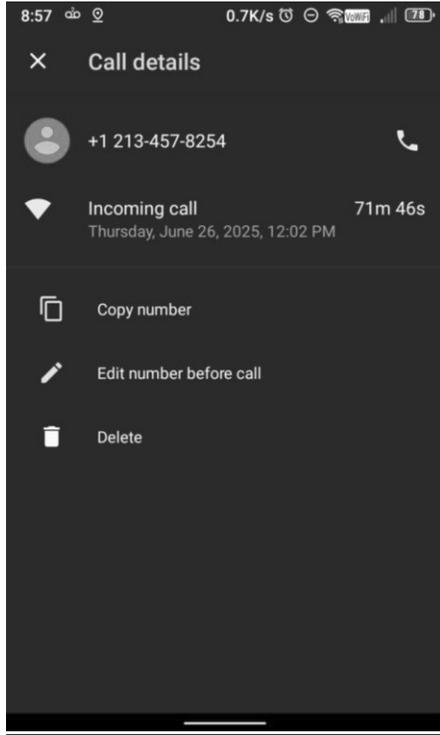
13
14 I declare under penalty of perjury under the laws of the State of California and the United
15 States that the foregoing is true and correct and that this declaration was executed on June 27,
16 2025, in Los Angeles, California.
17

18 

19
20 Matthew R. Walsh
21 19197 Golden Valley Rd #333
22 Santa Clarita, CA 91387
23 matthew@winteryear.com
24 (661) 644-0012
25 Plaintiff in pro per
26
27
28

EXHIBIT A

On June 26, 2025, I participated in a telephone call with defense counsel lasting 71 minutes and 46 seconds (1 hour, 11 minutes). This was the only procedurally valid meet and confer that has occurred in this case under rule 7-3. This conversation was to address the “Motion to Dismiss” and the “Motion to Strike Removal”. Attached hereto as Exhibit A is a true and correct screenshot of my call log documenting the date, duration, and phone number associated with this call.



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

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", written over a horizontal line.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT B

Defendant admits that this call, occurring on June 26, 2025, the same day she filed, was the first and only valid meet and confer as required under the 2025 Local Rules. Prior written e-mail correspondence does not satisfy the rule. Further, claims of hearsay are inadmissible.

Case 2:25-cv-05340-ODW-RAO Document 42-1 Filed 06/26/25 Page 2 of 9 Page ID #:872

DECLARATION OF KATHERINE ELLENA

I, Katherine Ellena, declare:

- I am an attorney with Reed Smith LLP and counsel for Defendant Rokoko Electronics ("Rokoko"). I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.
- I submit this declaration in support of Rokoko's Motion to Dismiss Plaintiff's Complaint (the "Motion").
- On June 13, 2025, Plaintiff informed my colleague, Emily Graue, on the telephone that he "is going to oppose pretty much everything" filed by Rokoko.
- In light of Plaintiff's statement, on June 19, 2025, I sent an email to Plaintiff setting forth the bases for Rokoko's Motion so as to have a thorough, written record of Rokoko's meet and confer efforts. In response, Plaintiff stated "Best of luck arguing that in front of a judge." Attached hereto as **Exhibit A** is a true and correct copy of my email communication and Plaintiff's response.
- On June 25, 2025, I exchanged further emails with Plaintiff regarding the Motion. Attached hereto as **Exhibit B** is a true and correct copy of those emails.
- On June 26, 2025, I further met and conferred with Plaintiff by telephone for more than one hour regarding the Motion.
- As of the filing of this Motion, having engaged in thorough meet and confer discussions regarding the Motion, I have been unable to reach a resolution with the Plaintiff as to the issues raised in the Motion.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this declaration was executed on June 26, 2025, in Los Angeles, California.

/s/ Katherine J. Ellena
Katherine J. Ellena

- 2 -

DECLARATION OF KATHERINE ELLENA IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS COMPLAINT

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



Matthew R. Walsh
Plaintiff in pro per

EXHIBIT C

Defendant’s counsel stated “I have been unable to reach a resolution with the Plaintiff as to the issues raised in this motion”; Plaintiff was the only Party proposing and continually pressing for 7-3 valid meet and confer.

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



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

Reply Reply All Forward

Wed 6/25/2025 7:12 PM

It's not what I would like.

It's your obligation under 7-3.

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Wednesday, June 25, 2025 7:10 PM
To: matthew@winteryear.com; Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

Matthew - I explained in detail the basis for our motion to dismiss last week and your response was “good luck arguing that to a judge”. If you would like to meet and confer further, I am happy to have a call tomorrow. Please let me know your availability.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Wednesday, June 25, 2025 7:06:28 PM
To: Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

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

Counsel,

I saw Defendant’s Notice of Withdrawal of the Motion to Dismiss.

Would you like to schedule a proper meet and confer regarding any future motion — ideally 7+ days in advance this time — so we can avoid repeating the same procedural issues?

Have a good night.
Matthew R. Walsh

Connected Display Settings 100%

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

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT D

Defendant's Counsel claims Plaintiff has been "uncooperative" to meet and confer, yet Plaintiff has sent over 50 emails since June 12, 2025 regarding the case.

Results	By Date			
From	To	Subject	Sent	Size
Yesterday				
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25	I have a window also tomorrow 11am - 1pm actually. So lets just do that, im planning on leaving out	29 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25	I just checked my calendar. Lets talk Friday at 1pm	29 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25	Ask your hearing statement again... Hearing things that didn't happen is not dispute resolution.	31 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25	It's not what I would like. It's your obligation under 7.3.	21 KB	
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25	Courtlet, I saw Defendant's Notice of Withdrawal of the Motion to Dismiss. Would you like to	16 KB	
Last Week				
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Citizen's diversity is DOA, the judge outlined the exact case law precisely. (In order to be a citizen	14 KB	
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	I expected that. I've finished some too.	256 KB	
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Far too late for that. Does that make up for 8 days of illegal filings? Nope. You don't get retroactive	8 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Courtlet, You have received multiple documented communications containing forensic proof of	1 MB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	and this one. I'm done sending these - you get the point.	1 MB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Forgot to attach this one... The time zone in Emily's e-mail headers also match what is on that file.	1 MB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Hello again everyone, This message serves as final notice pursuant to the meet and confer	682 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/2025	Good afternoon everyone, Happy Friday. I have been conducting deep forensic analysis of all	385 KB	
ODW, cham... Plaintiff's Proposed order for MOTION TO STRIKE DEFENDANTS REMO... RE: MATTHEW R. WALSH v. ROKOKO ELECTRO... Case	Thu 6/19/2025	Here you are.	81 KB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/2025	Here you are.	215 KB	
Status 1 RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO... RE: MATTHEW R. WALSH v. ROKOKO ELECTRO... Case	Thu 6/19/2025	Please deliver these to the central district court, morning is best if possible.	7 MB	
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/2025	Sorry about that, these ones are correct.	6 MB	

Results	By Date			
From	To	Subject	Sent	Size
Elena, Kath... RE: Rokoko - Meet and Confer Re: Complaint	Thu 6/19/2025	I keep asking this question: Why are Michael and Emily - once again - in this e-mail chain? What is		
Elena, Kath... RE: Rokoko - Meet and Confer Re: Complaint	Thu 6/19/2025	Best of luck arguing that in front of a judge. Why are Michael and Emily - once again - in this e-mail		
Elena, Kath... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/2025	Actually, I'm saving the Court from a waste of judicial resources now and forthcoming by your firm.		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/2025	I intend to move to strike your entire removal as improper under 28 U.S.C. § 1446(d) and all subsequent		
ODW, cham... Plaintiff's Proposed orders Case No. 2:25-CV-05340-ODW-RAO	Thu 6/19/2025	Plaintiff's Proposed orders Case No. 2:25-CV-05340-ODW-RAO - end-		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/18/2025	Heather, My continued investigation and outreach have uncovered significantly more evidence than		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Hello Heather and Elena, I have removed Michael and Emily from the e-mail chain since they are not		
Status 1 RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO... RE: MATTHEW R. WALSH v. ROKOKO ELECTRO... Case	Tue 6/17/2025	Deliver both of these to Central District Court please no later than 6/18. The earlier the better, I have		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Also, in case you were unaware - Your clients, their investors and many other possible DOE's along		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Heather, I will be proposing additional discovery.		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Hello everyone, Here is the supplemental declaration as filed. I'll finish my reply to your opposition		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	You mentioned DOE's previously, do you represent them as well?		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	That's okay that you opposed. My reply will be very short. Probably just a few lines. I'll make sure you		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Perfect thank you. Please be advised that I have just filed a Supplemental Declaration in support of my		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Emily, In reviewing the procedural history of this case, I noted your Pro Hac Vice status is nonexistent		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Good morning everyone, Please see attached as filed with the Court. Thank you! Matthew R. Walsh		
Status 1 RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO... RE: MATTHEW R. WALSH v. ROKOKO ELECTRO... Case	Tue 6/17/2025	Please file this as well. Thank you.		
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Mon 6/16/2025	Hello everyone, Here are today's documents, service by mail is on the way also! Have a great night!		

Results	By Date			
From	To	Subject	Sent	Size
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/2025	Good morning everyone, Please see attached as filed with the Court. Thank you! Matthew R. Walsh	254 KB	
Status 1 RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO... RE: MATTHEW R. WALSH v. ROKOKO ELECTRO... Case	Tue 6/17/2025	Please file this as well. Thank you.	305 KB	
Valencia, He... RE: Matthew R. Walsh v. Rokoko Electronics et al	Mon 6/16/25	Hello everyone, Here are today's documents, service by mail is on the way also! Have a great night,	2 MB	
WVOJ SF RE: URGENT - District court filing Account #230809 - TO BE FILED FOR... Mon 6/16/25	Mon 6/16/25	Add these two as well and bill accordingly	491 KB	
WVOJ SF RE: URGENT - District court filing Account #230809 - TO BE FILED FOR... Mon 6/16/25	Mon 6/16/25	Attached	1 MB	
woj@prose... URGENT - District court filing Account #230809 - TO BE FILED FOR 71... Mon 6/16/25	Mon 6/16/25	Disregard the last e-mail, this is complete. Central district federal court Los Angeles. Thank you!	606 KB	
woj@prose... URGENT - District court filing account #230809 Mon 6/16/25	Mon 6/16/25	I need this filed first thing in the morning or today even if possible. Central district federal court	314 KB	
Graue, Emily RE: Notice - Ex Parte Application for Additional Time to Respond to th... Mon 6/16/25	Mon 6/16/25	Also, I don't want to imply from your conduct, do you consent to strict electronic service going	13 KB	
Graue, Emily RE: Notice - Ex Parte Application for Additional Time to Respond to th... Mon 6/16/25	Mon 6/16/25	Emily, As you are running my state clocks out, I now intend to file an ex parte TRO along with an	14 KB	
Graue, Emily RE: Notice - Ex Parte Application for Additional Time to Respond to th... Mon 6/16/25	Mon 6/16/25	As stated on the phone I intend to oppose the motion and intend to move to strike your ex parte	13 KB	
Valencia, He... RE: WALSH v. ROKOKO ELECTRONICS Mon 6/16/25	Mon 6/16/25	Please see the attached documents NOTICE OF MOTION AND MOTION TO REMAND PROPOSED	7 MB	
Valencia, He... RE: WALSH v. ROKOKO ELECTRONICS Mon 6/16/25	Mon 6/16/25	Good morning. I intend to oppose. I filed my motions on Friday as well. Would you like courtesy	9 KB	
Two Weeks Ago				
Elena, Kath... RE: Rokoko Electronics - Motion for the Enlargement of Time Notice Thu 6/12/2025	Thu 6/12/2025	Also as advised. The MSJ and supporting documents on file in the state case is to be amended or	30 KB	
Elena, Kath... RE: Rokoko Electronics - Motion for the Enlargement of Time Notice Thu 6/12/2025	Thu 6/12/2025	I'm not debating with you, you aren't the judge. If you don't know the prongs of what makes a	31 KB	
Valencia, He... RE: WALSH v. ROKOKO ELECTRONICS Thu 6/12/2025	Thu 6/12/2025	I do not consent to electronic service. Serve them accordingly.	13 KB	
Graue, Emily RE: Rokoko Electronics - Motion for the Enlargement of Time Notice Thu 6/12/2025	Thu 6/12/2025	Emily, Although we spoke on the phone I am responding for the record. I will be filing a motion to	14 KB	

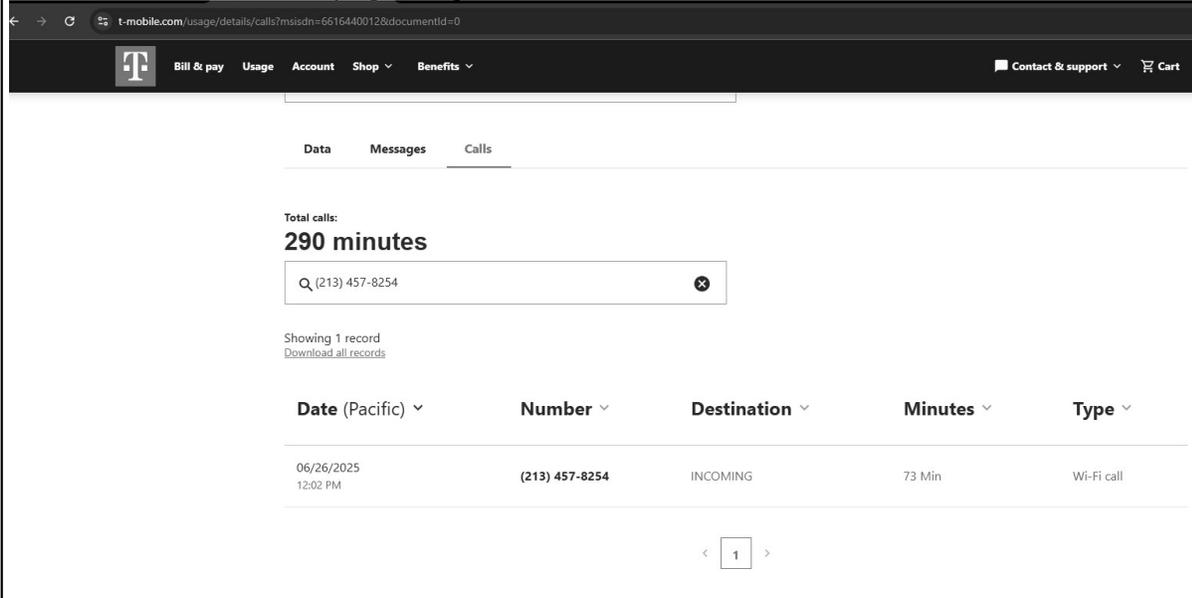
I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California that this is a true and correct copy of a document I personally received, created, or obtained in connection with this case, and it has not been materially altered.

Executed this 27 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT E

Only one phone call ever occurred from Counsel Katherine J. Ellena. The day she filed the motion to dismiss, entirely ignoring the 7-3 rule Plaintiff has been struck for.



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

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is written over a horizontal line.

Matthew R. Walsh
Plaintiff in pro per

EXHIBIT F

Only 1 call from Emily Graue, unadmitted counsel, removed from docket, no pro hac vice status still acting as active counsel. Meet and confer sessions never lasted more than 3 minutes, many were sub 1 minute. Plaintiff called Defendant 3x, Defendant’s counsel did not want to engage. Even under the older 2024 local rule 7-3, this is not “*contact opposing counsel to discuss thoroughly, preferably in person, the substance of the contemplated motion and any potential resolution*”. Defendant never wanted to discuss anything.

Date (Pacific)	Number	Destination	Minutes	Type
06/16/2025 03:07 PM	(312) 207-2954	CHICAGO, IL	1 Min	Wi-Fi call
06/16/2025 01:23 PM	(312) 207-2954	INCOMING	1 Min	Wi-Fi call
06/12/2025 11:45 AM	(312) 207-2954	CHICAGO, IL	3 Min	Wi-Fi call
06/12/2025 11:41 AM	(312) 207-2954	CHICAGO, IL	2 Min	Wi-Fi call

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

Matthew R. Walsh
Plaintiff in pro per

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PROOF OF SERVICE

I, Matthew R. Walsh, declare:

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

On June 27, 2025, I served the following document(s):

PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT

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

Reed Smith LLP (Counsel for Defendant)

Heather Valencia, Esq.

Hvalencia@reedsmith.com

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

Executed on June 27, 2025

Santa Clarita, California



Matthew R. Walsh
Plaintiff In Pro Per