

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

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

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

**NOTICE OF LODGING OF PLAINTIFFS
EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER
TO STAY PROCEEDINGS UNTIL
PLAINTIFF'S MOTION TO STRIKE
REMOVAL IS RULED UPON**

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

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9
10 **NOTICE OF LODGING OF PLAINTIFFS EX PARTE APPLICATION**
11 **FOR TEMPORARY RESTRAINING ORDER TO**
12 **STAY PROCEEDINGS UNTIL**
13 **PLAINTIFF'S MOTION TO STRIKE REMOVAL IS RULED UPON**
14

15
16 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**
17

18 **PLEASE TAKE NOTICE** that on July 6, 2025, Plaintiff Matthew R. Walsh submitted
19 for filing via EDSS the attached **Ex Parte Application for Temporary Restraining Order to**
20 **Stay Proceedings Until Plaintiff’s Motion to Strike Removal is Ruled Upon.**

21
22 To date, Plaintiff’s Ex Parte Application has not been docketed or ruled upon.

23
24 Plaintiff respectfully lodges the attached filing with this Court to ensure timely judicial notice
25 and review, particularly in light of the upcoming July 15, 2025 deadline for Plaintiff’s
26 Opposition to Defendant’s Motion to Dismiss (Dkt. 42). The Ex Parte Application seeks, in the
27 alternative:

- 28
- 29 1. A temporary stay of all briefing deadlines,
 - 30 2. An order shortening time to hear Plaintiff’s Motion to Strike (submitted
31 concurrently),
 - 32 3. A 30-day extension to oppose the MTD, and
 - 33 4. Leave to exceed local rule word limits due to the defective nature of Defendant’s
34 motion.

35
36 This Notice is submitted in the interest of judicial efficiency and to preserve the record pending
37 further Court action.

38
39 A true and correct copy of the Ex Parte Application is attached hereto as **EXHIBIT A**

DATED: July 7, 2025



Matthew R. Walsh
Plaintiff in pro per

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 July 7, 2025, I served the following document(s):

NOTICE OF LODGING OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER TO STAY PROCEEDINGS UNTIL PLAINTIFF'S MOTION TO STRIKE REMOVAL IS RULED UPON

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 July 7, 2025
Santa Clarita, California



Matthew R. Walsh
Plaintiff In Pro Per

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EXHIBIT A

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

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]

**EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER
TO STAY PROCEEDINGS UNTIL
PLAINTIFF’S MOTION TO STRIKE
REMOVAL IS RULED UPON**

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

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9
10 **EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER**
11 **TO STAY PROCEEDINGS UNTIL PLAINTIFF’S MOTION**
12 **TO STRIKE REMOVAL IS RULED UPON**
13
14

15 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

16
17 **PLEASE TAKE NOTICE ...** Plaintiff respectfully applies ex parte for an order staying all
18 briefing and responsive deadlines in this matter — including Plaintiff’s Opposition to

19 Defendant's Motion to Dismiss (Dkt. 42) — until the Court has ruled on Plaintiff's pending
20 Motion to Strike Defendant's Notice of Removal.

21
22 **IN THE ALTERNATIVE:** Plaintiff seeks: (1) an order shortening time to hear the Motion to
23 Strike Removal on regular notice and; (2) An extension of time (+30 days) to answer the Motion
24 to Dismiss and; (3) An order granting leave of court to answer the motion outside of Local Rule
25 word limits should the Court require Plaintiff do so.

26
27 Because the pending Motion to Dismiss is procedurally defective under Local Rules 7-3, 7-4, 11-
28 6.1 and 11-6.2; and that it further arises from a removal Plaintiff contends is void ab initio,
29 allowing the MTD briefing to proceed prior to an order granting or denying Plaintiff's motion
30 would irreparably prejudice Plaintiff and potentially waste judicial resources and the time of all
31 Parties.

32

33

34 **CERTIFICATION OF CONFERENCE OF OPPOSING COUNSEL**

35

36 This application is made following the conference of counsel pursuant to L.R. 7-3 which took
37 place on June 26, 2025. Submitted more than 7 days after Plaintiff met and conferred with
38 Defendant on June 26, 2025 indicating his intention to strike the removal, file ex parte and on
39 what grounds. Defendant indicated they would oppose. Defendant was again noticed on July 6,
40 2025 by e-mail.

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STATEMENT OF SUPPORTING DOCUMENTS

This application is based on the attached Memorandum of Points and Authorities, the concurrently filed Supplemental Declaration of Matthew R. Walsh and attached Exhibits 1-21, the complete Court record in this case, and any evidence or argument presented at hearing.

MEMORANDUM OF POINTS AND AUTHORITIES

1. INTRODUCTION

- a. This application is made pursuant to the Court's inherent authority, Local Rule 7-19, and Fed. R. Civ. P. 6(c), on the grounds that Plaintiff will suffer irreparable prejudice absent a stay, as the currently calendared Motion to Dismiss is procedurally defective and improper

- b. This application is based upon this notice, the accompanying memorandum of points and authorities, the declaration of Matthew R. Walsh, all pleadings and papers on file in this action, and such further evidence and argument as the Court may permit.

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2. LEGAL STANDARD

a. L.R. 7-3 Conference of Counsel Prior to Filing of Motions

“counsel contemplating the filing of any motion must first contact opposing counsel to discuss thoroughly, preferably in person, the substance of the contemplated motion and any potential resolution. The conference must take place in person, by telephone, or via video conference at least 7 days prior to the filing of the motion.”

-- This applies because at no time in this Case has Defendant’s Counsel met and conferred with Defendant until June 26, 2025; hours later they filed their Motion to Dismiss; as they did with all other filings.

b. L.R. 7-4 Motions.

“The Court may decline to consider a motion unless it meets the requirements of L.R. 7-3 through 7-8”

-- This applies because the Court struck many of Plaintiff’s motions for these violations, yet Defendant has violated them at every filing as well especially on the Motion to Dismiss.

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c. Local Rule 11.6-1 Points and Authorities

“no memorandum of points and authorities, pretrial brief, trial brief, or posttrial brief may exceed 7,000 words”

– This applies because Defendant’s Counsel filed a Motion to Dismiss at over 14,500 words and falsely certified it as 6,999 words.

d. Local Rule 11.6-2 Certificate of Compliance

“must include on the last page of the document a certificate by the attorney or the unrepresented party filing the document that the document complies with the type-volume limitation of L.R. 11-6.1. The person preparing the certificate may rely on the word count of the word-processing system used to prepare the document.”

– This applies because Defendant’s Counsel filed a Motion to Dismiss at over 14,500 words and falsely certified it as 6,999 words.

e. Certain frauds upon the court cause judicial machinery to not perform properly

“that species of fraud which does or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudicating cases that are presented for adjudication.” (Travelers Indemnity Company v. Gore, 761 F.2d 1549, 1552 (11th Cir.1985))

110 -- This applies because Defendant’s systemic misconduct in this Court – including
111 false certification, false statements, omissions to the Court and refusal to follow Local
112 Rules while Plaintiff is held in strict Compliance obstructs the Courts ability to fairly
113 adjudicate motions.

114
115 **f. Contemptuous actions on the Court and it’s rules can be punished**

116 *“The power to punish for contempts is inherent in all courts.” (Chambers v. NASCO,*
117 *Inc., 501 U.S. 32, 44, 111 S.Ct. 2123 (1991))*

118
119 – This applies because Defendant has shown contempt for the dispute process, Local
120 Rules, the Court and Plaintiff alike.

121
122 **g. Signing another attorneys name is a forged signature and documents are void.**

123 *“a signature procured under false pretenses is tantamount to a forged signature.” –*
124 *“those executed under false pretenses, and are void ab initio” (Weiss v. Phillips, 65*
125 *N.Y.S.3d at 155–56)*

126
127 – This applies because forensic data shows the signature was never the final
128 modification or addition to Defendant’s filings and therefore was evidentially placed
129 by non-admitted, out-of-state attorneys with no pro hac vice status.

130
131 **h. Forging an attorneys signature, preparing or even filing is fraud on the court.**

132 *“the court suspects, the petitioner created the affidavit and forged Attorney Mullins's*

133 *signature, or had someone else create the affidavit and forge Mullins's signature, the*
134 *false, forged affidavit constitutes criminal perjury under 18 U.S.C. § 1621(2)” –*
135 *“Whoever prepared and caused the affidavit to be filed arguably attempted to commit*
136 *a fraud on the court.” (West v. United States, United States District Court, E.D.*
137 *Wisconsin)*

138
139 – This applies because forensic data shows the signature was never the final
140 modification or addition to Defendant’s filings and therefore was evidentially placed
141 by non-admitted, out-of-state attorneys with no pro hac vice status.

142
143 i. **Pavelic & LeFlore v. Marvel Entertainment Group, 493 U.S. 120 (1989) --**

144 Holding that signing and filing are nondelegable responsibilities, and violations fall
145 on the individual attorney.

146
147 j. **Newman-Green, Inc. v. Alfonzo-Larrain, 490 U.S. 826 (1989) --** Requires both
148 U.S. citizenship and domicile in a state to qualify for diversity jurisdiction.

149
150 k. **Kanter v. Warner-Lambert Co., 265 F.3d 853 (9th Cir. 2001) --** Defines domicile
151 as a permanent home with intent to remain.

152
153 l. **28 U.S.C. § 1447(c) --** *“If at any time before final judgment it appears the district*
154 *court lacks subject matter jurisdiction, the case must be remanded.”*

156 m. **Rules of Professional Conduct – Rule 5.5 & Rule 9.40** -- Governing unauthorized
157 practice and requirements for pro hac vice in California.

158
159 n. **CA Business & Professions Code §§ 6125 and 6126** -- Prohibit practicing law in
160 California without a license.

161
162 o. **L.R. 83-2.1.1 & L.R. 83-2.1.4** -- Prohibit unauthorized practice of law by non-
163 admitted attorneys and require court approval before filing or appearing.

164
165 p. **ABA Rule 5.5 (a)** “*A lawyer shall not practice law in a jurisdiction in violation of*
166 *the regulation of the legal profession in that jurisdiction, or assist another in doing*
167 *so.*”

168 -- This applies because Defendant’s Counsel had only one admitted attorney of record,
169 yet unadmitted attorney’s with no pro hac vice status authored nearly all filings and
170 rubber stamped her name on them.

171
172 q. **ABA Rule 5.5 (b)** *A lawyer who is not admitted to practice in this jurisdiction shall*
173 *not: (2) hold out to the public or otherwise represent that the lawyer is admitted to*
174 *practice law in this jurisdiction.*

175
176 r. **ABA Rule 5.5 (d)** “*A lawyer admitted in another United States jurisdiction or in a*
177 *foreign jurisdiction, and not disbarred or suspended from practice in any jurisdiction*
178 *or the equivalent thereof, or a person otherwise lawfully practicing as an in-house*

179 *counsel under the laws of a foreign jurisdiction, may provide legal services through*
180 *an office or other systematic and continuous presence in this jurisdiction that: (1) are*
181 *provided to the lawyer's employer or its organizational affiliates, are not services for*
182 *which the forum requires pro hac vice admission;”*

183

184

185 **3. ARGUMENT**

186 a. Plaintiff requests an Ex Parte application for an order to shorten the time on his
187 Motion to Strike Notice of Removal; or in the alternative for a temporary stay of
188 briefing on Defendant’s Motion to Dismiss.

189

190 b. Plaintiff's opposition is due July 15, 2025, and without relief, Plaintiff will be forced
191 to expend resources responding to a defective motion which is impossible to object to
192 due to the issues raised here and likely – the entire Federal removal as well may likely
193 be found void ab initio by this Court.

194

195 c. Defendant’s MTD was knowingly filed in violation of Local Rule 7-3 (Exhibit 1, 10,
196 12) as it was filed within hours of the only meet and confer which has ever occurred
197 in this case due to opposing Counsel’s unwillingness to participate over the duration
198 of this case. (Exhibit 10, 11)

199

- 200 d. Defendant’s Counsel intentionally violated Local Rule 7-3 and even so much as
201 included an express admission against interest to the same (Exhibits 10, 1)
202
- 203 e. Defendant’s filing is further defective as it was filed intentionally in violation of
204 L.R.’s 11-6.1 and 11-6.2 as it consists of 14,600+ words (Exhibit 9) while the
205 maximum limit is 7,000.
206
- 207 f. To circumvent a sua sponte order striking it, Counsel stripped it of substantive
208 headings to make it difficult to ascertain a proper count and then certified to the Court
209 that it was 6,999 words total (Exhibit 8) when it was over twice that amount. These,
210 and more are continuous, systemic and intentional acts *“perpetrated by officers of the*
211 *court so that the judicial machinery cannot perform in the usual manner” (Travelers*
212 *Indemnity Company v. Gore, 761 F.2d 1549, 1552 (11th Cir.1985))*
213
- 214 g. The MTD was filed defective and improperly despite Plaintiff’s prior written
215 warnings to Defendant (Exhibits 2, 1, 3) of the same in which he stated: *“If you feel*
216 *like you have met your obligations under meet and confer, please provide your phone*
217 *records and show me where it lasts more than 1 minute. Show me e-mails where you*
218 *actually try to resolve litigation prior to filing motions. **Show me where you provide***
219 ***7 days minimum before filing.**” ... “Call me after 1pm, that will start your 7 day*
220 ***clock.**”* (Exhibit 1). Plaintiff continually noticed and warned Defendant as it was just
221 days after Plaintiff’s documents were stricken for the same violations as prescribed by
222 L.R. 7-4: *“The Court may decline to consider a motion unless it meets the*

223 *requirements of L.R. 7-3 through 7-8”*

224

225 h. Defendant’s MTD is impossible to oppose in compliance with local rules, due to it’s

226 length of 14,600+ words. Plaintiff cannot possibly oppose even a substantial portion

227 of their argument in under 7,000 words; thus a decision must be reached on Plaintiff’s

228 Motion to Strike Defendant’s Removal which addresses this issue as this issue is “*a*

229 *fraud perpetrated by officers of the court so that the judicial machinery cannot*

230 *perform in the usual manner* “ (*Travelers Indemnity Company v. Gore, 761 F.2d*

231 *1549, 1552 (11th Cir.1985)*)

232

233 i. Plaintiff believes there is no possibility of Defendant establishing jurisdiction in this

234 Court and the removal and the MTD are imminently faced with impending failure as

235 stated in Plaintiff’s Motion to Strike Removal and as summarized:

236

237 i. None of Defendant’s controlling members are American citizens, they are of

238 Danish nationality and citizenship. *Newman-Green, Inc. v. Alfonzo-Larrain,*

239 *490 U.S. 826 (1989)* -- Requires both U.S. citizenship and domicile in a state

240 to qualify for diversity jurisdiction.

241

242 ii. The removal was entirely predicated on diversity jurisdiction; and supported

243 by intentionally false statements under penalty of perjury (Exhibit 14) as

244 Defendant’s primary place of business is in California (Exhibit 21); and

245 Defendant’s CEO and co-founder are domiciled here (Exhibit 21) and have

246 been as early as 2016 as established under *Kanter v. Warner-Lambert Co.*,
247 *265 F.3d 853 (9th Cir. 2001)*.

248
249 iii. Defendant omitted an LLC from the Court (Rokoko, LLC) (Exhibit 21) which
250 makes it's entity a citizen of every state, and gives Superior Court jurisdiction
251 over Federal as found in (*28 U.S.C. § 1332(c)(1)*); *see also New Alaska Dev.*
252 *Corp. v. Guetschow, 869 F.2d 1298, 1300-01 (9th Cir. 1989)*)

253
254 j. This Ex-Parte application, if granted would likely resolve all matters in this case
255 without any harm or prejudice to either side. Plaintiff believes the entire removal to
256 Federal Court was improper as it was:

257
258 i. ...Filed in the name of an unadmitted out-of-state attorney (Michael Galibois)
259 while Michael had no pro hac vice status (Exhibit 16, 17, 18) in violation of
260 RPC Rules 5.5 & 9.40, CA B&PC 6125 & 6126 and L.R. 83-2.1.1 & L.R. 83-
261 2.1.4. Further, as detailed in Plaintiff's concurrently filed Motion to Strike,
262 Section I(C), incorporated herein by reference for completeness.

263
264 ii. ...Established with a signature from an attorney (Katherine J. Ellena), who is
265 not listed on the removal document whatsoever (Exhibit 16, 17, 18) . Her
266 signature being used to assist Michael Galibois in attaining a Federal Removal
267 under false pretense in violation of ABA Model Rule 5.5(b)(1) "*A lawyer*

268 *shall not practice law in a jurisdiction in violation of the regulation of the*
269 *legal profession in that jurisdiction, **or assist another in doing so.***"

270
271 iii. ...Continuously and almost entirely performed by non-admitted attorneys
272 before and even after they were noticed removed from docket for no pro hac
273 vice status (Exhibit 15-20).; and continually warned by Plaintiff (Exhibit 5-7)
274 which is intentional and continuous violation of ABC Model Rule 5.5(d)(1):
275 *"are provided to the lawyer's employer or its organizational affiliates, are **not***
276 *services for which the forum requires pro hac vice admission;"*

277
278 iv. ...Concluded by expert forensic research (Exhibits 15-20) clearly showing
279 the last modification to the documents occurred in the Eastern Time Zone;
280 where unadmitted attorneys live and work and communicated from (Exhibit
281 15) and **not** in the Pacific Time Zone where the only admitted attorney –
282 Katherine J. Ellena lives and works making any signature not placed by her,
283 or placed prior to the authoring of any documents -- a forgery under *West v.*
284 *United States, Weiss v. Phillips, , 18 U.S.C. § 1621(2))*

285
286 k. Plaintiff has attempted to resolve these matters (Exhibit 1 – 7) with Defendant
287 through meet and confer correspondence, however, Defendant is and was always
288 unwilling to cure obvious defects (Exhibits 10 - 13) ; of which (L.R.'s 11-6.1 & 11-
289 6.2) which sets a procedural trap for Plaintiff whether he opposes in time, or not.

291 1. Plaintiff has notified opposing counsel of this ex parte application in compliance with
292 L.R. 7-19.1. Declaration of Matthew R. Walsh filed concurrently herewith.

293

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296

297 DATED: July 6, 2025

298 Respectfully submitted,



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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

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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Plaintiff appearing in pro per, certifies that this brief contains 2,166 words, which complies with the word limit of L.R. 11-6.2.

The memorandum of points and authorities is less than 10 pages in length and so does not require a table of contents in compliance with L.R. 11-8.

DATED: July 6, 2025



Matthew R. Walsh
Plaintiff in pro per

325 **DECLARATION OF MATTHEW R. WALSH**
326 **IN SUPPORT OF PLAINTIFFS EX PARTE APPLICATION**
327 **FOR TRO / STAY PROCEEDINGS**
328

329 I, Matthew R. Walsh, declare: I am the Plaintiff. I have personal knowledge of the
330 following facts and, if called as a witness, I could and would testify competently thereto. I
331 submit this declaration in support of Plaintiff’s Ex Parte Application for TRO and Motion to Stay
332 Proceedings.

- 333 1. **Exhibit 1** – Plaintiff warned Defendant of L.R. 7-3 requirements one day before meet
334 and confer; started 7-day clock. Defendant filed anyway.
335
- 336 2. **Exhibit 2** – Plaintiff notified Defendant their filing was defective the next day and
337 reiterated 7-3 timeline.
338
- 339 3. **Exhibit 3** – Plaintiff again notified Defendant of procedural defects and requested
340 meet and confer to strike MTD; also addressed counsel conduct.
341
- 342 4. **Exhibit 4** – Plaintiff advised Defendant as early as June 20 of ongoing forensic
343 analysis of filings.
344
- 345 5. **Exhibit 5** – Plaintiff removed unadmitted counsel from email chain; Defendant re-
346 added them, showing their central role.
347
- 348 6. **Exhibit 6** – Plaintiff disclosed forensic findings and offered opportunity to cure.
349 Defendant responded only with now-approved pro hac vice filings.
350
- 351 7. **Exhibit 7** – Defendant never addressed unauthorized practice allegations, only
352 submitted pro hac filings in response.
353
- 354 8. **Exhibit 8** – Defendant certified their MTD was 6,999 words.
355
- 356 9. **Exhibit 9** – Actual word count of Defendant’s MTD is 14,636.
357
- 358 10. **Exhibit 10** – Defendant admits June 26 was the only valid meet and confer under
359 L.R. 7-3; email exchanges don’t satisfy the rule.
360

- 361 11. **Exhibit 11** – Defendant claimed Plaintiff was uncooperative, despite over 50 emails
362 sent between June 12–27, 2025.
363
- 364 12. **Exhibit 12** – Only one call from counsel Katherine Ellena — on the day she filed —
365 in violation of L.R. 7-3.
366
- 367 13. **Exhibit 13** – Only one call from unadmitted counsel Emily Graue; meet and confers
368 were under 3 minutes. Defendant refused engagement.
369
- 370 14. **Exhibit 14** – Defendant falsely stated under oath they were never a California
371 corporation.
372
- 373 15. **Exhibit 15** – Email headers and metadata confirm filings originated from unadmitted,
374 out-of-state counsel (Graue, Galibois).
375
- 376 16. **Exhibit 16** – Civil case cover sheet was not prepared by admitted counsel or anyone
377 with pro hac status.
378
- 379 17. **Exhibit 17** – Cover sheet used to remove case was authored by unadmitted counsel
380 who forged a local signature.
381
- 382 18. **Exhibit 18** – Notice of removal was initiated in Los Angeles, completed by
383 unadmitted, out-of-state attorneys.
384
- 385 19. **Exhibit 19** – Ex parte motion for extension of time authored over 8 hours by
386 unadmitted counsel. Local counsel touched it for ~30 minutes.
387
- 388 20. **Exhibit 20** – Declaration of Katherine J. Ellena was not written by her. Metadata
389 shows out-of-state attorneys completed it.
390
- 391 21. **Exhibit 21** – A visual aid showing Defendant is more California than Delaware and
392 Denmark combined.
393

394

395 Executed this 6 day of July, 2025, in Santa Clarita, California.

396

397 

398 Matthew R. Walsh
399 Plaintiff in pro per
400

401 **EXHIBIT 1**

402 One day prior to the only meet and confer ever in this case, Plaintiff warned Defendant of the 7-3
403 requirements and their deficiencies therein to comply. Further, Plaintiff makes it clear: meet and
404 confer is the beginning of the 7 day clock. Defendant filed anyways.

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.'
Wed 6/25/2025 7:26 PM
Reply Reply All Forward

people.
If you feel like you have met your obligations under meet and confer, please provide your phone records and show me where it lasts more than 1 minute. Show me e-mails where you actually try to resolve litigation prior to filing motions. Show me where you provide 7 days minimum before filing.
The point of meet and confer for 7 days isn't to say "im filing this motion, do you oppose" and hanging up. You're SUPPOSED to try and work things out prior to filing to not waste the courts time.
Bottom line – diversity of citizenship is dead. None of your clients are American citizens. This doesn't belong in Federal Court and you know it. The judge provided the case law, on the record. You should withdraw your removal before it's struck and you lose your tolling protections back in State.
Your goal should be resolution, not litigation sleight of hand.
Call me after 1pm, that will start your 7 day clock.

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Wednesday, June 25, 2025 7:21 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 -

We attempted to meet and confer with you and you were not willing to engage. You have also stated that you will oppose any motion we file. We have met our meet and confer obligations but, as I stated, I am happy to resume the meet and confer discussion with you. Please provide your availability tomorrow.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Wednesday, June 25, 2025 7:12 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>

406
407 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
408 that this is a true and correct copy of a document I personally received, created, or obtained in
409 connection with this case, and it has not been materially altered.

410 Executed this 6 day of July, 2025 in Santa Clarita, California.



413
414 Matthew R. Walsh
415 Plaintiff in pro per
416

417 **EXHIBIT 2**

418 Plaintiff notified Defendant the day after that their filings were defective and further reasserted
419 that he told them prior to the filing so they may file a valid answer or demurrer instead.
420

RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Ca...



matthew@winteryear.com

To 'Paredes, Valerie S.'

Cc 'Ellena, Katherine J.'; 'Valencia, Heather R.'; 'Galibois, Michael B.'; 'Graue, Emily H.'

Bcc 'britany@carbonfitlab.com'

Reply Reply All Forward

Fri 6/27/2025 11:37 PM



Hello everyone,

I added Emily and Michael back to the e-mail chain as they now have pro hac vice status. Not sure why they aren't included in this most recent communication you last initiated or if it was an oversight. Either way, Attached is my Entry of Default as filed with the Clerk.

Your team has failed to comply with Rule 7 which requires **meet** and confer 7-days in advance and which **must occur in person, by telephone or video conference**. NOT e-mail. I stated the same to you in writing BEFORE you refiled your MTD again, however, you refiled it despite the fact that I had multiple motions stricken for the same reason. In 60+ days, you could have filed an answer, or a demurrer – but, for reasons unknown you refiled your MTD on the last day, of a court granted extension -- the one and only date we've ever met and conferred by phone and included a declaration admitting you never met and conferred prior.

I've included my phone records as well and as discussed in the call, my motion to strike your removal will be filed 7 days from the day of our phone conference, in full compliance with 7-3.

I hope you have a great weekend.

Thanks
Matt

421
422 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
423 that this is a true and correct copy of a document I personally received, created, or obtained in
424 connection with this case, and it has not been materially altered.

425
426 Executed this 6 day of July, 2025 in Santa Clarita, California.
427

Matthew R. Walsh
Plaintiff in pro per

428
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432 **EXHIBIT 3**

433 Plaintiff notified Defendant again that their filings were defective; how they were defective and
434 further requesting a meet and confer to strike that document separately. Additionally, Plaintiff
435 noticed Defendant regarding their conduct and behavior during the meet and confer.
436

RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Ca...



matthew@winteryear.com
To 'Paredes, Valerie S.'
Cc 'Ellena, Katherine J.; 'Valencia, Heather R.'

Reply Reply All Forward ...

Fri 7/4/2025 4:46 PM

You replied to this message on 7/6/2025 12:12 PM.

I request a **meet** and confer on an upcoming motion to strike your motion to dismiss.

1. You mislabeled the document so that word counts could not be ascertained, it was not compliant.
2. You violated 7-3 which required a substantial **meeting** on the merits 7 days prior to filing, you filed the same day.
3. You openly lied about the word count citing 6999 words in your certificate of compliance, 1 less than the allowed amount; yet, the word count was really north of 14,500.
4. It is procedurally defective, and so dense, it cannot be responded to or opposed – which seems by design.
5. For other procedural defects.

Please let me know when your next availability is, also, please keep it professional this time – I don't want another repeat of our last **meeting**:

- Being literally yelled at to the point I had to continually threaten to end the call if she didn't calm down
- Being talked over constantly at high voices
- Being talked-at and stonewalled
- Being giggled at and told "im sure (giggle) that's not the right (giggle) you know – vehicle for *that*"
- Being talked down to because I'm "a pro per".

I expect professionalism, as you are required to do by your code of conduct.

That call was transcribed by the way. I am considering releasing it to the Court as further evidence towards sanctions.

Come respectfully and professionally, or assign another attorney who will.

Thank you,
Matthew R. Walsh

437
438 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
439 that this is a true and correct copy of a document I personally received, created, or obtained in
440 connection with this case, and it has not been materially altered.
441

442 Executed this 6 day of July, 2025 in Santa Clarita, California.
443

Matthew R. Walsh
Plaintiff in pro per

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448 **EXHIBIT 4**

449 Plaintiff notified Defendant as early as June 20, 2025 that he had begun forensic analysis of their
450 documents.
451

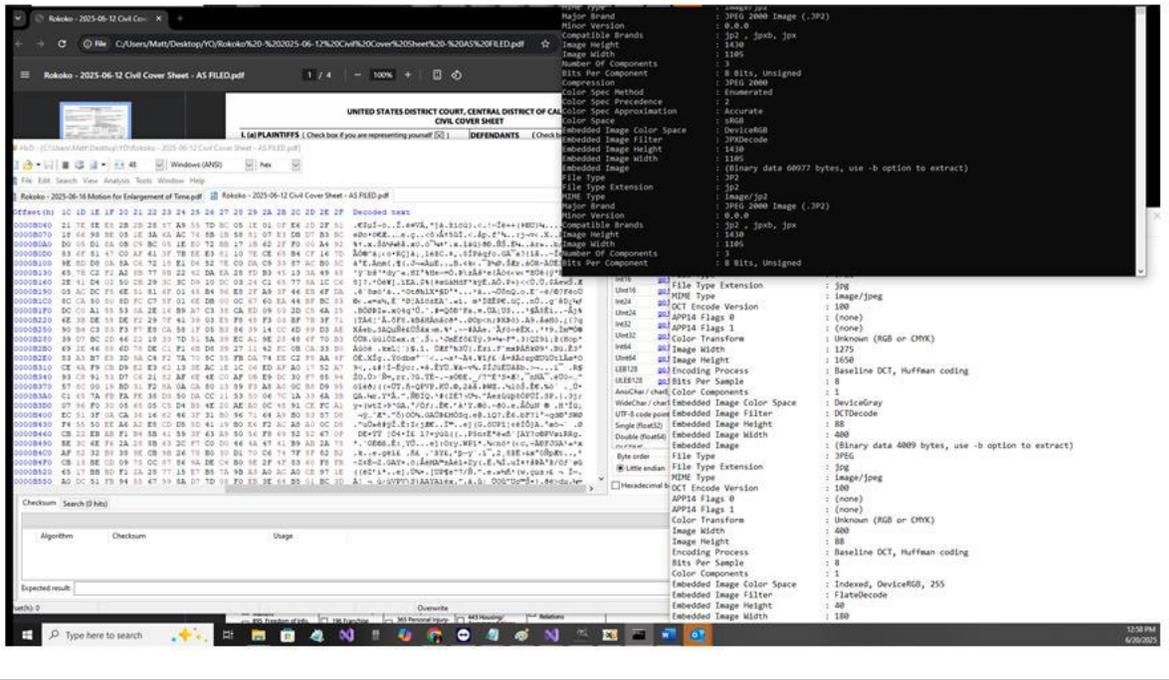
RE: Matthew R. Walsh v. Rokoko Electronics et al

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

 Reply  Reply All  Forward 

Fri 6/20/2025 1:09 PM

 You replied to this message on 6/20/2025 3:00 PM.



452
453 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
454 that this is a true and correct copy of a document I personally received, created, or obtained in
455 connection with this case, and it has not been materially altered.
456

457 Executed this 6 day of July, 2025 in Santa Clarita, California.
458

Matthew R. Walsh
Plaintiff in pro per

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463 **EXHIBIT 5**

464 Plaintiff once again removes Michael Galibois and Emily Graue from the e-mail chain, each
465 time, Defendant re-adds them; demonstrating they were critical to the function of these
466 proceedings.
467

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

468

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 conduced you are using them in your daily practices and will consider launching an inquiry and possibly a referral.

Thank you.
Matthew R. Walsh

469

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

473 Executed this 6 day of July, 2025 in Santa Clarita, California.
474

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 6

Plaintiff notified Defendant’s Counsel of the forensic findings and gave them the opportunity to cure/remove themselves from record before sanctions would be sought. All they responded back with was the now-approved pro hac vice applications, approved that same day, never addressing the matter further.

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



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

Reply Reply All Forward ...

Fri 6/20/2025 4:00 PM

Counsel,
You have received multiple documented communications containing forensic proof of unauthorized filings, post-removal misconduct, and active violation of the Court’s directive.
Let me be clear:

If you file **anything further in this matter** — an Answer, a Notice, a pleading of any kind — I will immediately file the full evidentiary record with the Court, including all metadata, authorship proof, time zone inconsistencies, and jurisdictional violations tied to your firm’s conduct and I will have it verified by outside experts who will also submit their reports.

This includes violations of Rule 11, Local Rules, and potential referrals for unauthorized practice and fraud on the court.

I expect you to again, remove yourself as counsel without any further filings; and fully retract your removal.

There will be no further warnings.

Matthew R. Walsh
Plaintiff in Pro Per

486

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 6 day of July, 2025 in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff in pro per

497 **EXHIBIT 7**

498 Defendant never addresses the unauthorized practice of law of Michael Galibois and Emily
499 Graue, instead, they just sent the applications now approved in response.
500

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



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

Reply Reply All Forward

Fri 6/20/2025 4:03 PM

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

Far too late for that. Does that make up for 8 days of illegal filings? Nope

You don't get retroactive privalage and you don't get to sign other attorneys names.

Sent via [BlackBerry Hub+ Inbox for Android](#)

From: HValencia@ReedSmith.com
Sent: June 20, 2025 4:00 PM
To: matthew@winteryear.com
Cc: KEllena@reedsmith.com; MGalibois@reedsmith.com; EGraue@reedsmith.com
Subject: Matthew R. Walsh v. Rokoko Electronics et al

Good afternoon,

Please see the attached documents.

ORDER GRANTING PRO HAC APPLICATION OF MICHAEL B. GALIBOIS
ORDER GRANTING PRO HAC APPLICATION OF EMILY H. GRAUE

Thank you,
Heather Valencia

Assistant to Katherine J. Ellena
Reed Smith LLP
515 South Flower Street, Suite 4300
Los Angeles, CA 90071-1514
Direct [213.457.6458](tel:213.457.6458) | hvalencia@reedsmith.com
Main [213.457.8000](tel:213.457.8000) | Fax [213.457.8080](tel:213.457.8080)

Please consider the environment before printing the contents of this email

501
502 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
503 that this is a true and correct copy of a document I personally received, created, or obtained in
504 connection with this case, and it has not been materially altered.
505

506 Executed this 6 day of July, 2025 in Santa Clarita, California.
507

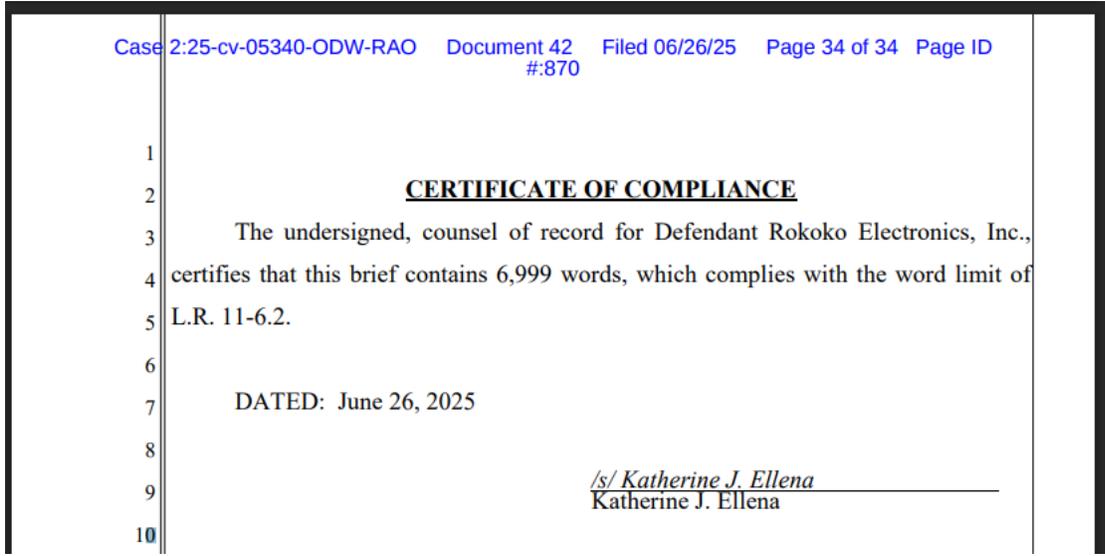
Matthew R. Walsh
Plaintiff in pro per

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512 **EXHIBIT 8**

513 Defendant's word count certificate of Compliance: 6,999 words; despite it being 14,500+ words

514



515

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

519

520 Executed this 6 day of July, 2025 in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff in pro per

526 **EXHIBIT 9**

527 Defendant's word count pursuant to local rules is 14,636.
528

```
python Always show details  | Copy

from PyPDF2 import PdfReader

# Load the PDF and extract all text
pdf_path = "/mnt/data/Rokoko - 2025-06-26 Dkt. 42-42-2 Defendant Rokoko Electronics' Notice of Mot
reader = PdfReader(pdf_path)

# Concatenate text from all pages
full_text = ""
for page in reader.pages:
    full_text += page.extract_text() + " "

# Count words according to Central District of California Local Rules (plain word count)
word_count = len(full_text.split())
word_count
```

Result
14636

The document contains **14,636 words**, based on a plain word count pursuant to the Central District of California's Local Rules. [-]

529
530 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
531 that this is a true and correct copy of a document I personally received, created, or obtained in
532 connection with this case, and it has not been materially altered.

533
534 Executed this 6 day of July, 2025 in Santa Clarita, California.
535



Matthew R. Walsh
Plaintiff in pro per

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540 **EXHIBIT 10**

541 Defendant admits that this call, occurring on June 26, 2025, the same day she filed, was the first
542 and only valid meet and confer as required under the 2025 Local Rules. Prior written e-mail
543 correspondence does not satisfy the rule. Further, claims of hearsay are inadmissible.
544

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:

1
2
3 1. I am an attorney with Reed Smith LLP and counsel for Defendant Rokoko
4 Electronics ("Rokoko"). I have personal knowledge of the following facts and, if called
5 as a witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Rokoko's Motion to Dismiss
7 Plaintiff's Complaint (the "Motion").

8 3. On June 13, 2025, Plaintiff informed my colleague, Emily Graue, on the
9 telephone that he "is going to oppose pretty much everything" filed by Rokoko.

10 4. In light of Plaintiff's statement, on June 19, 2025, I sent an email to
11 Plaintiff setting forth the bases for Rokoko's Motion so as to have a thorough, written
12 record of Rokoko's meet and confer efforts. In response, Plaintiff stated "Best of luck
13 arguing that in front of a judge." Attached hereto as **Exhibit A** is a true and correct
14 copy of my email communication and Plaintiff's response.

15 5. On June 25, 2025, I exchanged further emails with Plaintiff regarding the
16 Motion. Attached hereto as **Exhibit B** is a true and correct copy of those emails.

17 6. On June 26, 2025, I further met and conferred with Plaintiff by telephone
18 for more than one hour regarding the Motion.

19 7. As of the filing of this Motion, having engaged in thorough meet and
20 confer discussions regarding the Motion, I have been unable to reach a resolution with
21 the Plaintiff as to the issues raised in the Motion.

22 I declare under penalty of perjury under the laws of the State of California and
23 the United States that the foregoing is true and correct and that this declaration was
24 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

545
546
547 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
548 that this is a true and correct copy of a document I personally received, created, or obtained in
549 connection with this case, and it has not been materially altered.

550 Executed this 6 day of July, 2025 in Santa Clarita, California.
551
552



Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 11

Defendant's Counsel claims Plaintiff has been "uncooperative" to meet and confer, yet Plaintiff has sent over 50 emails from June 12, 2025 – June 27, 2025 regarding the case.

Results	By Date	Results
To	Size	To
Yesterday		
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25... 29 KB	Elena, Katha... RE: Rokoko - Meet and Confer Re: Complaint
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25... 29 KB	Elena, Katha... RE: Rokoko - Meet and Confer Re: Complaint
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25... 31 KB	Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25... 21 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Wed 6/25/25... 16 KB	ODW, chm... Plaintiff's Proposed Order Case No. 2:25-CV-05340-ODW-RAO
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 14 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 256 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 8 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 1 MB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 1 MB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 1 MB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 602 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Fri 6/20/25... 395 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
ODW, chm... Plaintiff's Proposed Order for MOTION TO STRIKE DEFENDANT'S REMOVAL OF COURT JURISDICTION	Fri 6/20/25... 81 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/25... 215 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Status T... RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO...	Thu 6/19/25... 7 MB	Status T... RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO...
Elena, Katha... RE: Matthew R. Walsh v. Rokoko Electronics et al	Thu 6/19/25... 6 MB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Results	By Date	Results
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Tue 6/17/25... 294 KB	Status T... RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO...
Status T... RE: Order Confirmation for MATTHEW R. WALSH v. ROKOKO ELECTRO...	Tue 6/17/25... 305 KB	Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al
Valencia, Ma... RE: Matthew R. Walsh v. Rokoko Electronics et al	Mon 6/16/25... 2 MB	WDSJ SF... URGENT - District court filing Account #230809 - TO BE FILED FOR...
WDSJ SF... URGENT - District court filing Account #230809 - TO BE FILED FOR...	Mon 6/16/25... 491 KB	WDSJ SF... URGENT - District court filing Account #230809 - TO BE FILED FOR...
WDSJ SF... URGENT - District court filing Account #230809 - TO BE FILED FOR...	Mon 6/16/25... 1 MB	wj@pww.com... URGENT - District court filing Account #230809 - TO BE FILED FOR...
wj@pww.com... URGENT - District court filing Account #230809 - TO BE FILED FOR...	Mon 6/16/25... 606 KB	wj@pww.com... URGENT - District court filing Account #230809
wj@pww.com... URGENT - District court filing Account #230809	Mon 6/16/25... 314 KB	Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...
Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...	Mon 6/16/25... 13 KB	Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...
Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...	Mon 6/16/25... 14 KB	Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...
Grace, Emily... RE: Notice - Ex Parte Application for Additional Time to Respond to RL...	Mon 6/16/25... 13 KB	Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS
Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS	Mon 6/16/25... 7 MB	Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS
Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS	Mon 6/16/25... 9 KB	Two Weeks Ago
Elena, Katha... RE: Rokoko Electronics - Motion for the Enforcement of Time Notice	Thu 6/12/25... 30 KB	Elena, Katha... RE: Rokoko Electronics - Motion for the Enforcement of Time Notice
Elena, Katha... RE: Rokoko Electronics - Motion for the Enforcement of Time Notice	Thu 6/12/25... 31 KB	Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS
Valencia, Ma... RE: WALSH v. ROKOKO ELECTRONICS	Thu 6/12/25... 13 KB	Grace, Emily... RE: Rokoko Electronics - Motion for the Enforcement of Time Notice
Grace, Emily... RE: Rokoko Electronics - Motion for the Enforcement of Time Notice	Thu 6/12/25... 14 KB	

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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.

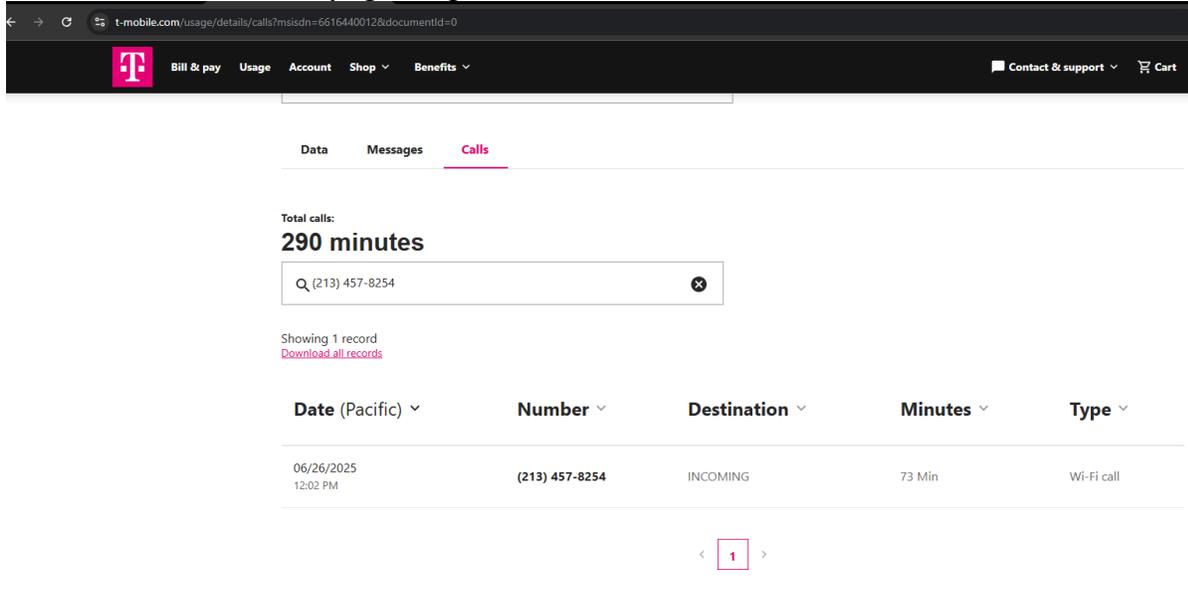
Executed this 6 day of July, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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573 **EXHIBIT 12**

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



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

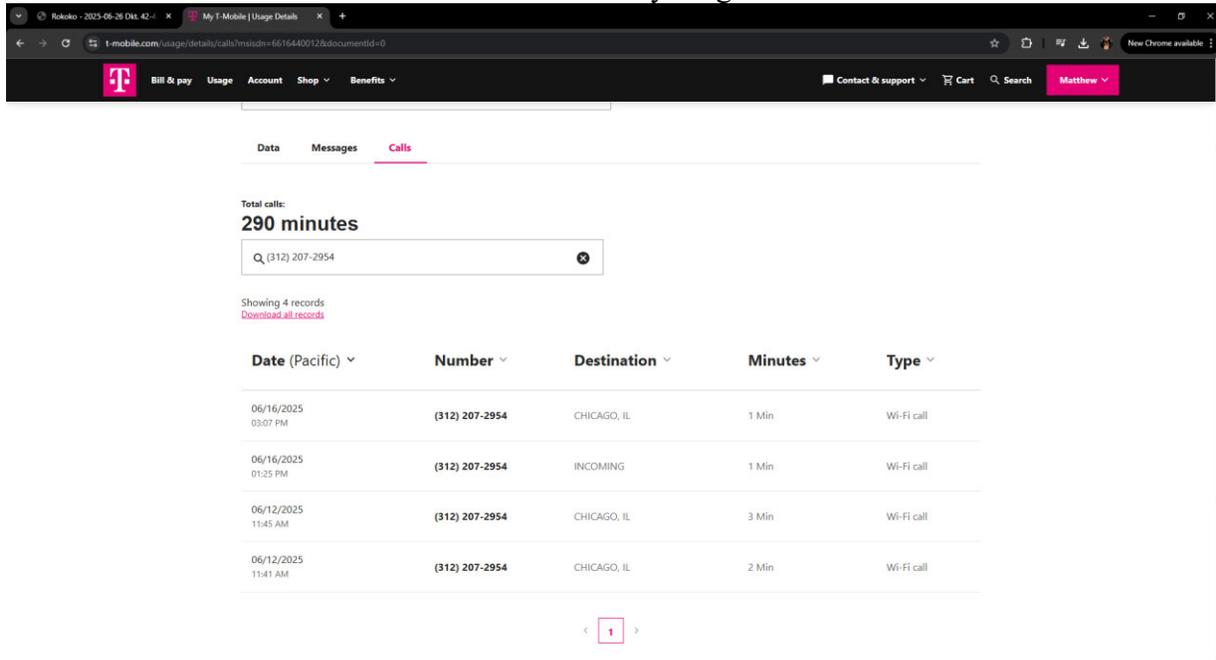
582
583 Executed this 6 day of July, 2025 in Santa Clarita, California.
584

Matthew R. Walsh
Plaintiff in pro per

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589 **EXHIBIT 13**

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



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

603
604 Executed this 6 day of July, 2025 in Santa Clarita, California.
605

Matthew R. Walsh
Plaintiff in pro per

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610 **EXHIBIT 14**

611 Defendants false statement under penalty of perjury that they have never been a California
612 Corporation before or after filing. This was shown to be false.

1	<u>DECLARATION OF MIKKEL OVERBY</u>
2	I, Mikkel Overby, declare:
3	1. I am CFO and COO for Rokoko Electronics (“Rokoko”), and I have held these positions since
4	April 2016. I make this declaration in support of the case titled <i>Matthew R. Walsh v. Rokoko</i>
5	<i>Electronics, et. al.</i> , Case No. 25STCV13828 filed in the Superior Court of California, County of Los
6	Angeles (the “State Court Action”). All of the information set forth herein is based on my personal
7	knowledge or my review of Rokoko’s corporate records, and if called to testify and be sworn as a
8	witness, I could and would competently testify thereto.
9	
10	2. In my positions as CFO and COO, I am familiar with and have personal knowledge of
11	Rokoko’s corporate structure and business operations. I have access to and regularly refer to business
12	records concerning Rokoko’s corporate organization and operations. In connection with the
13	preparation of this declaration, I reviewed certain documents described herein that were prepared and
14	maintained in the ordinary course of Rokoko’s business.
15	
16	3. On May 13, 2025 Plaintiff Matthew R. Walsh (“Plaintiff”) served Rokoko Electronics with
17	copies of the Summons and Complaint.
18	4. Rokoko was, at the time the State Court Action was commenced, and still is, a corporation
19	organized and existing under the laws of the State of Delaware with a principal place of business in
20	Copenhagen, Denmark.
21	
22	5. Rokoko’s Articles of Incorporation and Certificate of Good Standing, showing that Rokoko is
23	a Delaware corporation, are attached hereto as Exhibit 1 and Exhibit 2 respectively.
24	
25	6. Rokoko’s principal place of business is located at Sankt Gertruds Stræde 10, 1129 København,
26	Denmark, from where Rokoko’s senior executives direct, control, and coordinate the company’s
27	primary business activities on a day-to-day basis, and where company’s corporate and financial
28	records are maintained in Denmark.

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

613
614

1 7. At no point prior to filing or at the time of filing was Rokoko a citizen of California. Rokoko
2 has only ever been a Delaware corporation with a principal place of business in Denmark.

3 I declare under penalty of perjury under the laws of the State of California and the United States
4 that the foregoing is true and correct.

5 Executed this 11th day of June 2025, in Copenhagen, Denmark.

6
7 
8 Mikkel Overby

9
10 REED SMITH LLP
11 A limited liability partnership formed in the State of Delaware
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618 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
619 that this is a true and correct copy of a document I personally received, created, or obtained in
620 connection with this case, and it has not been materially altered.

621 Executed this 6 day of July, 2025 in Santa Clarita, California.
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624 Matthew R. Walsh
625 Plaintiff in pro per
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EXHIBIT 15

Defendant’s counsel Emily Graue and Michael Galibois are both only licensed to practice law in Illinois. Both are with ReedSmith in Chicago. Emily’s email headers, return a timezone of Eastern (UTC -04:00), this timezone matches all metadata from the documents allegedly authored by local counsel – indicating they are instead authored by counsel without pro hac vice status and not licensed to practice law in California.

```

*Untitled - Notepad
File Edit Format View Help
Return-Path: <egraue@reedsmith.com>
Delivered-To: matthew@interyear.com
Received: from gator3161.hostgator.com
  by gator3161.hostgator.com with LMTP
  id IE7VG20JUHxJugANI7Ng
  (envelope-from <egraue@reedsmith.com>)
  for <matthew@interyear.com>; Mon, 16 Jun 2025 16:15:15 -0500
Return-path: <egraue@reedsmith.com>
Envelope-to: matthew@interyear.com
Delivery-date: Mon, 16 Jun 2025 16:15:15 -0500
Received: from us-smtg-delivery-164.mimecast.com ([170.10.133.164]:45523)
  by gator3161.hostgator.com with esmtps (TLS1.2) tls:TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384
  (Exim 4.98.1)
  (envelope-from <egraue@reedsmith.com>)
  id JuRnA4-000000211R-1EAK
  for matthew@interyear.com;
  Mon, 16 Jun 2025 16:15:15 -0500
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=reedsmith.com;
  s=mimecast20171211; t=1750108503;
  h=from:reply-to:subject:subject:date:date:message-id:
  to:to:cc:mime-version:mime-version:content-type:content-type;
  bh=F36B5yCb/3sAzfPI/Pvc5kxag7DE7k306W0Vg6GCM+;
  b=dAfwCTaVcVAMknau7Scd+4HEBptBureQpH25Jduz81JN3PmI93Xb7IXM5pQX8bMvYvk
  WRFZG157383052duqCummaIEI2xkZ1u6C3h/pYVDFalVQJESASNLQV5vUu0-FpQJ
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Received: from CYP3R03CJ001.outbound.protection.outlook.com
  ([mail-westcentralusazson11023001.outbound.protection.outlook.com
  [40.93.201.81]) by relay.mimecast.com with ESMTP with STARTTLS
  (version=TLSv1.3, cipher=TLS_AES_256_GCM_SHA384) id
  us-mta-98-unM01Q5Me0EMbVYKIQng-2 Mon, 16 Jun 2025 17:14:59 -0400
X-MS-Exchange: Origin=SME0EB0E71KIQng-2
X-HMecast-MFC-AGG-ID: un4mC1Q5Me0EMbVYKIQng_1750108498
Received: from D57PR03MB5607.namprd03.prod.outlook.com (2603:10b6:5:2ce:121)
  by CO1PR03MB5875.namprd03.prod.outlook.com (2603:10b6:303:90:21) with
  Microsoft SMTP Server (version=TLS1_2,
  cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8835.29; Mon, 16 Jun
  2025 21:14:54 +0000
Received: from D57PR03MB5607.namprd03.prod.outlook.com
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  ([fe80:a8e4:2ab9:62a7:6eb155]) with mapi id 15.20.8835.025; Mon, 16 Jun 2025
  21:14:53 +0000
From: "Graue, Emily H." <EGraue@reedsmith.com>
To: "matthew@interyear.com" <matthew@interyear.com>
CC: "Galibois, Michael B." <MGalibois@reedsmith.com>, "Ellena, Katherine J."
  <KEllena@reedsmith.com>
Subject: Notice - Ex Parte Application for Additional Time to Respond to the
  Complaint Filing
Thread-Topic: Notice - Ex Parte Application for Additional Time to Respond to
  the Complaint Filing
Thread-Index: AdvfASUKlv7c5V0qYqLq5hshadjj1w==
Date: Mon, 16 Jun 2025 21:14:53 +0000
Message-ID: <D57PR03MB56075355400329E2633F7657C970A@D57PR03MB5607.namprd03.prod.outlook.com>
Accept-Language: en-US
X-MS-Has-Attach:
X-MS-TNEF-Correlator:
x-mde-cl: PdxT2GUgB25aw511C0gPj4=
x-sdm-usedemail: EGraue@reedsmith.com
x-ms-publictraffictype: Email
x-ms-trafficdiagnostic: D57PR03MB5607:EE_|CO1PR03MB5875:EE_
x-ms-office365-filtering-correlation-id: b19f6cca-8a17-460f-bc8d-08ddad1ad694
x-ms-exchange-senderadcheck: 1
x-ms-exchange-antispam-relay: 0
x-microsoft-antispam: BCL:0;ARA:13230040|1800799024|366016|376014|809689900|380700018
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```

The e-mail from Emily shows UTC -04:00 (Eastern Timezone)
Emily and Michael are both employed in Chicago but Emily's
family, alma mater and place of origin is Ohio.

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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 6 day of July 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 16

The civil case cover sheet was not authored by admitted counsel, or any counsel of record; nor counsel legally allowed to practice law in the state of California with no pro hac vice status.

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Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.txt - Notepad
File Edit Format View Help
ExifTool Version Number      : 13.31
File Name                    : Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.pdf
Directory                    : .
File Size                    : 2.4 MB
Zone Identifier              : Exists
File Modification Date/Time   : 2025:06:20 12:53:02-07:00
File Access Date/Time        : 2025:06:20 12:53:13-07:00
File Creation Date/Time      : 2025:06:20 12:53:02-07:00
File Permissions             : -rw-rw-rw-
File Type                    : PDF
File Type Extension          : pdf
MIME Type                    : application/pdf
PDF Version                  : 1.7
Linearized                   : No
Has XFA                      : No
Format                       : application/pdf
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Modify Date                  : 2025:06:12 14:06:20-07:00
Metadata Date                : 2025:06:12 14:06:20-07:00
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History Parameters            : Page:1
Page Count                   : 4
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Embedded Image Filter         : FlateDecode, DCTDecode
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Embedded Image Width         : 1275
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APP14 Flags 1                : (none)
Color Transform               : Unknown (RGB or CMYK)
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Image Height                 : 1650
Encoding Process              : Baseline DCT, Huffman coding
Bits Per Sample              : 8
Color Components              : 1
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Embedded Image Filter         : DCTDecode
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APP14 Flags 1                : (none)
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Creator                      : Aspose Ltd.
Producer                     : Aspose.PDF for .NET 22.6.0
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Megapixels                   : 2.1

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The civil case cover sheet was created in UTC -04:00 timezone (Eastern) matching Emily's e-mail header timezone. Emily and Michael both are not licensed to practice in California yet are authoring documents and forging Katherine J. Ellena's signature on them then sending them to Los Angeles for CM/ECF filing.

The file was edited in Los Angeles timezone (UTC -07:00) by local counsel, who took the 3 pages consisting of the civil case cover sheet, and then locally 1 additional page was scanned onto it. That page is a proof of service hand-signed by Heather Valencia.

Additionally other metadata confirms the same, it was created and modified by unadmitted counsel in the Eastern timezone (UTC -04:00)

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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 6 day of July 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 17

The civil case cover sheet, which was used to remove Plaintiff's case was entirely authored by unadmitted counsel with no pro hac vice status, who forged a local attorney signature and then sent it to Los Angeles to be filed.

Created by unadmitted counsel p1

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

I. (a) PLAINTIFFS (Check box if you are representing yourself) DEFENDANTS (Check box if you are representing yourself)

Matthew R. Walsh
Relixie Electronics

(b) County of Residence of First Listed Plaintiff: Los Angeles County of Residence of First Listed Defendant: Delaware

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.
HeadSmith LLP
Michael Galambos (SBN 6272257)
1825 Century Blvd, Suite 200, Torrance, CA 90503

II. BASIS OF JURISDICTION (Place an "X" in one box only)

1. U.S. Government Plaintiff 2. U.S. Government Defendant 3. Fed. Plaintiff 4. Div. of Part 5. Original Proceeding 6. Removed from State Court

V. REQUESTED IN COMPLAINT: JURISDICTIONAL CLASS ACTION under F.R.C.P. 23: VI. CAUSE OF ACTION (Cite the U.S. Civil Code Sections 1332, 1441, and 1446; dispute warranty, and related claims by Defendant)

VII. NATURE OF SUIT (Place an "X" in one box only)

110 Insurance 115 False Claims Act 120 Marine 130 Motor Vehicle 140 Bankruptcy 150 Consumer Credit 160 Consumer Protection Act 170 Contract 180 Other Contract 190 Contract 200 Contract 210 Land 220 Real Estate 230 Real Estate 240 Real Estate 250 Real Estate 260 Real Estate 270 Real Estate 280 Real Estate 290 Real Estate 300 Real Estate 310 Real Estate 320 Real Estate 330 Real Estate 340 Real Estate 350 Real Estate 360 Real Estate 370 Real Estate 380 Real Estate 390 Real Estate 400 Real Estate 410 Real Estate 420 Real Estate 430 Real Estate 440 Real Estate 450 Real Estate 460 Real Estate 470 Real Estate 480 Real Estate 490 Real Estate 500 Real Estate 510 Real Estate 520 Real Estate 530 Real Estate 540 Real Estate 550 Real Estate 560 Real Estate 570 Real Estate 580 Real Estate 590 Real Estate 600 Real Estate 610 Real Estate 620 Real Estate 630 Real Estate 640 Real Estate 650 Real Estate 660 Real Estate 670 Real Estate 680 Real Estate 690 Real Estate 700 Real Estate 710 Real Estate 720 Real Estate 730 Real Estate 740 Real Estate 750 Real Estate 760 Real Estate 770 Real Estate 780 Real Estate 790 Real Estate 800 Real Estate 810 Real Estate 820 Real Estate 830 Real Estate 840 Real Estate 850 Real Estate 860 Real Estate 870 Real Estate 880 Real Estate 890 Real Estate 900 Real Estate 910 Real Estate 920 Real Estate 930 Real Estate 940 Real Estate 950 Real Estate 960 Real Estate 970 Real Estate 980 Real Estate 990 Real Estate 1000 Real Estate

FOR OFFICE USE ONLY: CV-71 (10/20)

Out of state, unadmitted counsel listed on the cover sheet.

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

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

QUESTION A: Was this case removed from state court? Yes No

If "Yes," skip to Question B. If "No," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.

STATE CASE WAS PENDING IN THE COUNTY OF:	INITIAL DIVISION IN CAJD IS:
<input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo	Western
<input type="checkbox"/> Orange	Southern
<input type="checkbox"/> Riverside or San Bernardino	Eastern

QUESTION B: Is this United States, or one of its agencies or employees, a PLAINTIFF in this action? Yes No

If "Yes," skip to Question C. If "No," answer Question B.1., or B.2., or B.3., as applicable.

B.1. Do 50% or more of the defendants who reside in the district reside in Orange County? Yes No

If "Yes," your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.

B.2. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) Yes No

If "Yes," your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.

B.3. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) Yes No

If "Yes," your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.

QUESTION C: Is this United States, or one of its agencies or employees, a DEFENDANT in this action? Yes No

If "Yes," skip to Question D. If "No," answer Question C.1., or C.2., or C.3., as applicable.

C.1. Do 50% or more of the plaintiffs who reside in the district reside in Orange County? Yes No

If "Yes," your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.

C.2. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) Yes No

If "Yes," your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.

C.3. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) Yes No

If "Yes," your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.

QUESTION D: Location of plaintiffs and defendants?

	A. Orange County	B. Riverside or San Bernardino County	C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County
Indicate the location(s) in which 50% or more of plaintiffs who reside in this district reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Indicate the location(s) in which 50% or more of defendants who reside in this district reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

D.1. Is there at least one answer in Column A? Yes No

If "Yes," your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question E, below, and continue from there.

If "No," go to question D2 to the right.

D.2. Is there at least one answer in Column B? Yes No

If "Yes," your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question E, below, and continue from there.

If "No," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below.

QUESTION E: Initial Division? INITIAL DIVISION IN CAJD: WESTERN

QUESTION F: Northern Counties? Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? Yes No

CV-71 (10/20) CIVIL COVER SHEET Page 2 of 3

Created by unadmitted counsel p2

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

(IX)(a). IDENTICAL CASES: Has this action been previously filed in this court? NO YES

If "Yes," list case number(s):

(IX)(b). RELATED CASES: Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court? NO YES

If "Yes," list case number(s):

Civil cases are related when they (check all that apply):

A. Arise from the same or a closely related transaction, happening, or event;

B. Call for determination of the same or substantially related or similar questions of law and fact; or

C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

A civil forfeiture case and a criminal case are related when they (check all that apply):

A. Arise from the same or a closely related transaction, happening, or event;

B. Call for determination of the same or substantially related or similar questions of law and fact; or

C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT): /s/ Katherine J. Elena DATE: June 12, 2025

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).

This signature was forged by unapproved counsel

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HEA	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 U.S.C. 1395f (b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed for insured workers for disability insurance benefits based on disability under Title 2 of the Social Security Act, as amended, plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWV	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (b))
864	SSD	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

CV-71 (10/20) CIVIL COVER SHEET Page 3 of 3

Created by unadmitted counsel p3

TE OF SERVICE
fornia, over the age of eighteen years, and not ed in the office of a member of the bar of as made. My business address is Street, Suite 4300, Los Angeles, CA 90071. document(s) by the method indicated below:

VER SHEET
sted above in a sealed envelope with postage nited States mail at Los Angeles, California I am readily familiar with the firm's practice f correspondence for mailing. Under that p with the U.S. Postal Service on that same prepaid in the ordinary course of business. the party served, service is presumed invalid or postage meter date is more than one day ailing in this Declaration. e parties at the email addresses listed below:

under the laws of the United States that the me 12, 2025, at Los Angeles, California.

Heather Valencia
Heather Valencia

This is the only document actually created in Los Angeles. Added by scanner - page 4

CERTIFICATE OF SERVICE

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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 6 day of July 2025 in Santa Clarita, California.

Matthew R. Walsh

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 18

The notice of removal was originated in Los Angeles and then completed over the course of about 4 hours by unadmitted counsel with no pro hac vice status.

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Rokoko - 2025-06-12 Notice of Removal - AS FILED.txt - Notepad
File Edit Format View Help
Embedded Image : (Binary data 436 bytes, use -b option to extract)
File Type : JP2
File Type Extension : .jp2
MIME Type : image/jp2
Major Brand : JPEG 2000 Image (.JP2)
Minor Version : 0.0.0
Compatible Brands : jp2 , jpxb, jpx
Image Height : 205
Image Width : 441
Number Of Components : 1
Bits Per Component : 8 Bits, Unsigned
Compression : JPEG 2000
Color Spec Method : Enumerated
Color Spec Precedence : 2
Color Spec Approximation : Accurate
Color Space : sRGB
Embedded Image Color Space : DeviceGray
Embedded Image Filter : JPXDecode
Embedded Image Height : 56
Embedded Image Width : 283
Embedded Image : (Binary data 2180 bytes, use -b option to extract)
File Type : JP2
File Type Extension : .jp2
MIME Type : image/jp2
Major Brand : JPEG 2000 Image (.JP2)
Minor Version : 0.0.0
Compatible Brands : jp2 , jpxb, jpx
Image Height : 56
Image Width : 283
Number Of Components : 1
Bits Per Component : 8 Bits, Unsigned
Compression : JPEG 2000
Color Spec Method : Enumerated
Color Spec Precedence : 2
Color Spec Approximation : Accurate
Color Space : Grayscale
Embedded Image Color Space : DeviceRGB
Embedded Image Filter : DCTDecode
Embedded Image Height : 148
Embedded Image Width : 150
Embedded Image : (Binary data 17960 bytes, use -b option to extract)
File Type : JPEG
File Type Extension : .jpg
MIME Type : image/jpeg
JFIF Version : 1.02
Resolution Unit : None
X Resolution : 100
Y Resolution : 100
Quality : 100%
DCT Encode Version : 100
APP14 Flags 0 : [14], Encoded with Blend=1 downsampling
APP14 Flags 1 : (none)
Color Transform : YCbCr
Image Width : 150
Image Height : 148
Encoding Process : Baseline DCT, Huffman coding
Bits Per Sample : 8
Color Components : 3
Y Cb Cr Sub Sampling : YCbCr4:4:4 (1 1)
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Embedded Image Filter : FlateDecode
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Embedded Image Filter : FlateDecode
Embedded Image Height : 40
Embedded Image Width : 180
File Type : (unsupported)
Create Date : 2025-06-12 18:24:49-07:00
Modify Date : 2025-06-12 17:35:00-04:00
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Producer : Aspose.PDF for .NET 22.6.0
Image Size : 1105x1430
Megapixels : 1.6

```

The notice of removal was created in UTC -04:00 timezone (Los Angeles) and then completed about 4 hours later by unadmitted counsel in the UTC -04:00 timezone (Eastern)

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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 6 day of July 2025 in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 19

The **ex-parte motion for extension of time** was completed by out of state, unadmitted counsel with no pro hac vice status over the period of about 8 hours. Defendant’s local counsel spent roughly 30 minutes on the document prior to prepare it for Emily or Michael to complete it.

Ex Parte Motion for Extension of Time_.txt - Notepad

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File Edit Format View Help
ExifTool Version Number      : 13.31
File Name                    : Ex Parte Motion for Extension of Time_.pdf
Directory                    : .
File Size                    : 212 kB
Zone Identifier              : Exists
File Modification Date/Time   : 2025:06:20 15:31:52-07:00
File Access Date/Time        : 2025:06:20 15:43:57-07:00
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File Permissions             : -rw-rw-rw-
File Type                    : PDF
File Type Extension          : pdf
MIME Type                    : application/pdf
PDF Version                  : 1.6
Linearized                   : Yes
Create Date                  : 2025:06:16 17:26:27-07:00
Modify Date                  : 2025:06:16 21:26:52-04:00
Creator                      : Aspose Ltd.
Producer                     : Aspose.PDF for .NET 22.6.0
Has XFA                      : No
Create Date                  : 2025:06:16 17:26:27-07:00
Modify Date                  : 2025:06:16 17:56:48-07:00
Metadata Date                : 2025:06:16 17:56:48-07:00
Format                       : application/pdf
Document ID                  : uuid:1122b6c7-e29b-4ea8-b309-d5b92dab642c
Instance ID                  : uuid:9722d856-8257-4aaf-a0d3-ddb9ad637b09
Page Count                   : 8
Embedded Image Color Space   : Indexed, DeviceRGB, 255
Embedded Image Filter        : FlateDecode
Embedded Image Height        : 40
Embedded Image Width         : 180
File Type                    : (unsupported)

```

Defendant's counsel in Los Angeles (UTC -07:00 timezone) began the Ex Parte Motion to grant time and then sent it to unadmitted counsel in Eastern timezone (UTC -04:00) who completed it about 8 hours later.

Further metadata demonstrates that Los Angeles was responsible for the initial creation of the document only over about a 30 minute period where it was then sent to unadmitted out of state counsel for completion.

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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 6 day of July 2025 in Santa Clarita, California.



Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 20

Defendant’s local counsel spent about 30 minutes on Katherine J. Ellena’s declaration and then unadmitted counsel with no pro hac vice status finished the document over about an additional 42 minutes and 36 seconds. She wrote to the Court “*I, Katherine J. Ellena, declare:*” and signed it with her name and “*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 16, 2025, in Los Angeles, California.*” However, those statements are false as this document was not written by her.

```

Ellena Declaration ISO Ex Parte.txt - Notepad
File Edit Format View Help
ExifTool Version Number      : 13.31
File Name                    : Ellena Declaration ISO Ex Parte.pdf
Directory                   : .
File Size                    : 2.6 MB
Zone Identifier              : Exists
File Modification Date/Time  : 2025:06:20 15:31:54-07:00
File Access Date/Time       : 2025:06:20 15:31:59-07:00
File Creation Date/Time     : 2025:06:20 15:31:54-07:00
File Permissions            : -rw-rw-rw-
File Type                   : PDF
File Type Extension         : pdf
MIME Type                   : application/pdf
PDF Version                 : 1.7
Linearized                  : No
Has XFA                    : No
Format                     : application/pdf
Metadata Date               : 2025:06:16 18:04:27-07:00
Create Date                 : 2025:06:16 17:44:16-07:00
Modify Date                 : 2025:06:16 18:04:27-07:00
Document ID                 : uuid:fb7503a3-9f07-4746-8980-9caf0154aae0
Instance ID                 : uuid:2ca74679-ee1f-43d6-8601-d4dae5128ba0
Page Count                  : 10
Embedded Image Color Space  : DeviceRGB
Embedded Image Filter       : DCTDecode
Embedded Image Height       : 373
Embedded Image Width        : 1846
Embedded Image              : (Binary data 34930 bytes, use -b option to extract)
File Type                   : JPEG
File Type Extension         : jpg
MIME Type                   : image/jpeg
JFIF Version                : 1.01
Resolution Unit             : inches
X Resolution                : 96
Y Resolution                : 96
Image Width                 : 1846
Image Height                : 373
Encoding Process            : Baseline DCT, Huffman coding
Bits Per Sample             : 8
Color Components            : 3
Y Cb Cr Sub Sampling       : YCbCr4:2:0 (2 2)
Embedded Image Color Space  : DeviceGray
Embedded Image Filter       : FlateDecode
Embedded Image Height       : 5
Embedded Image Width        : 5
File Type                   : (unsupported)
Embedded Image Color Space  : Indexed, DeviceRGB, 255
Embedded Image Filter       : FlateDecode
Embedded Image Height       : 40
Embedded Image Width        : 180
File Type                   : (unsupported)
Create Date                 : 2025:06:16 17:44:16-07:00
Modify Date                 : 2025:06:16 21:26:52-04:00
Creator                    : Aspose Ltd.
Producer                   : Aspose.PDF for .NET 22.6.0
Image Size                 : 1846x373
Megapixels                  : 0.689

```

Katherine J. Ellena's declaration was authored originally in Los Angeles for about 30 minutes.

The actual declaration however, was written in Eastern timezone, not by local admitted counsel.

The time spent authoring the document was about 42 minutes and 36 seconds.

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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 6 day of July 2025 in Santa Clarita, California.

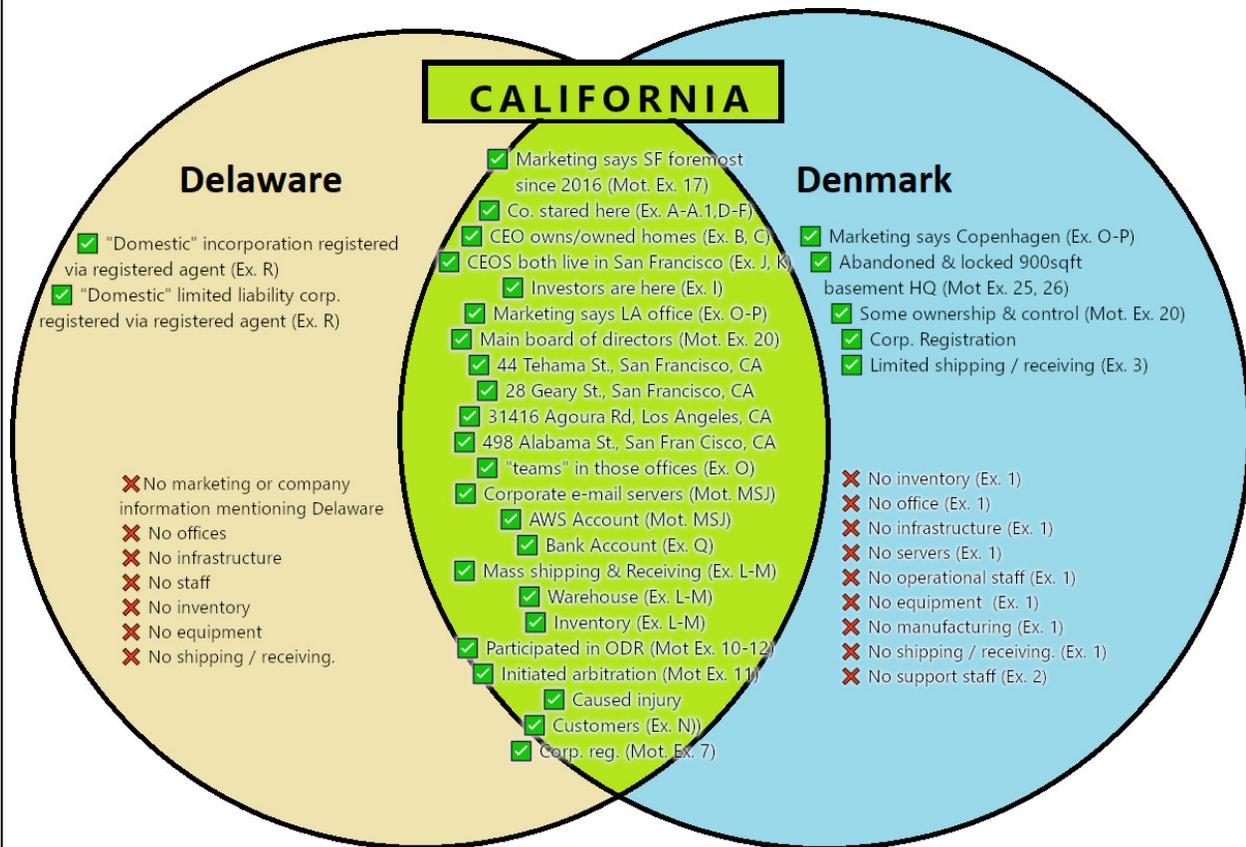
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT 21

A visual aid showing Defendant and their members are more California than Delaware and Denmark combined and doubled.



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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 6 day of July 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 July 6, 2025, I served the following document(s):

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER TO STAY PROCEEDINGS UNTIL PLAINTIFF’S MOTION TO STRIKE REMOVAL IS RULED UPON

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 July 6, 2025
Santa Clarita, California



Matthew R. Walsh
Plaintiff In Pro Per