



1 MATTHEW R. WALSH
2 19197 GOLDEN VALLEY RD #333
3 SANTA CLARITA, CA 91387
4 (661) 644-0012

5 Plaintiff In Pro Per,

6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 MATTHEW R. WALSH
9 19197 GOLDEN VALLEY RD #333
10 SANTA CLARITA, CA 91387,

11 Plaintiff In Pro Per,

12 vs.

13 ROKOKO ELECTRONICS
14 (AND DOES 1 THROUGH 50, INCLUSIVE)
15 31416 AGOURA RD STE 118
16 WESTLAKE VILLAGE, CA
17 91361

18 Defendant

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

Before: Hon. Otis D. Wright II
Courtroom 5D

Hearing date: TBD
Hearing time: TBD

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF PLAINTIFF'S MOTION
TO STRIKE DEFENDANT'S REMOVAL**

Filed concurrently with:
- Memorandum of Points and Authorities
- Declaration of Matthew R. Walsh
- Exhibits A through ZN, SET2-A through SET2-N
- Plaintiff's notice of motion and motion to strike notice
of removal and all related filings.

19 **REQUEST FOR JUDICIAL NOTICE**

20 **IN SUPPORT OF**

21 **PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S REMOVAL**

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26 TO THE HONORABLE COURT:
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1 Pursuant to Federal Rule of Evidence 201(b), Plaintiff respectfully requests that the Court
2 take judicial notice of the following facts, each of which is either (1) not subject to reasonable
3 dispute because it is generally known within this Court’s jurisdiction, or (2) can be accurately
4 and readily determined from sources whose accuracy cannot reasonably be questioned.
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7 This request supports Plaintiff’s Motion to Strike Defendant’s Notice of Removal and is
8 based on the accompanying Declaration and Supplemental Declaration, Exhibits A through ZN,
9 and Exhibits SET2-A through SET2-N.
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12 Plaintiff specifically requests judicial notice of the following:
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14 **I. FACTS AND RECORDS SUPPORTING LACK OF DIVERSITY JURISDICTION**
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- 16
- 17 • Defendant’s CEO has resided in **San Francisco, California since at least 2015**, as
18 shown by his own statements, home purchases, and public online presence (Exhibits A–
19 H, J, K, NO, NP).
20
 - 21 • Defendant opened a **California warehouse (Ex. L)** and maintains **U.S.-based shipping**
22 **operations and payment plans exclusive to U.S. customers** (Ex. L.1, M).
23
 - 24 • Defendant’s **primary customers, operations, banking (Ex. Q), and personnel** are all
25 based in California (Ex. N–P, R, S, O).
26
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- 1 • Defendant maintains only a **locked cellar basement in Denmark** as its “headquarters,”
2 which has not been opened or actively used in years (Ex. ZF), and a **mailbox in Athens**
3 (Ex. P).
4
- 5 • Defendant’s bank account is held in California and linked to his nearby personal address
6 (Ex. Q, NP).
7
- 8 • Defendant’s own statements to investors and the Danish government admit **California is**
9 **their primary base of operations**, contradicting any claim of Danish centrality (Ex. C,
10 ZC, ZD, ZE, ZG).
11
- 12 • Defendant’s **co-founders and other controlling members** also list San Francisco as
13 their residence on public profiles (Ex. K).
14
- 15 • Defendant’s U.S. LLC formation was not disclosed to the Court in the removal (Ex. R).
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19 **II. JUDICIALLY NOTICEABLE PUBLIC AND GOVERNMENT RECORDS**

- 20 • Defendant’s **Kickstarter campaign**, public interviews, and participation in **TechCrunch**
21 **Disrupt** in San Francisco (Ex. A, D–F) are publicly archived and referenced in national
22 press.
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- 1 • Defendant’s **Delaware business registration**, California bank, and San Francisco
2 mailing address are visible through public records (Ex. R, Q, P).
- 3 • Defendant’s **court filings in this action**, including the Notice of Removal, are matters of
4 record. Plaintiff challenges their authenticity and authorship, but their content is
5 judicially noticeable.
6

7

8 **III. UNAUTHORIZED PRACTICE OF LAW AND PROCEDURAL DEFECTS IN**
9 **REMOVAL**

- 10 • Defendant’s Notice of Removal was:
 - 11
 - 12
 - 13
 - 14 ○ **Authored by unadmitted out-of-state attorneys** without pro hac vice status at
15 the time of filing (Ex. Y, Z, ZA, SET2-A–SET2-D).
 - 16
 - 17
 - 18 ○ **Signed with the name of a local counsel (Ellena)** but was provably written by
19 other attorneys (SET2-B, SET2-F–SET2-G).
 - 20
 - 21 ○ Accompanied by multiple filings during the 8-day period when out-of-state
22 attorneys acted as lead drafters and correspondents (SET2-E–SET2-G, T–ZK).
 - 23
 - 24
- 25 • Plaintiff repeatedly **notified counsel of the ethical violations and filed forensic**
26 **metadata showing authorship** by unauthorized attorneys (SET2-H–SET2-M).
27
28

- 1 • Plaintiff documented that **unauthorized attorneys continued participating** in strategic
2 discussions, filings, and email chains even after being removed from the docket (Ex. X–
3 ZN).
- 4
- 5
- 6 • Defendant’s conduct, when combined with the factual misrepresentations in the Notice of
7 Removal and lack of proof of diversity jurisdiction, renders the removal **procedurally**
8 **and substantively improper**.
- 9

10 **IV. COURT’S PRIOR STATEMENT ON DIVERSITY JURISDICTION**

11 Plaintiff further requests judicial notice of this Court’s own prior language quoting
12 *Newman-Green, Inc. v. Alfonzo-Larrain*, 490 U.S. 826, 828 (1989):
13

14
15 *“[I]n order to be a citizen of a State within the meaning of the diversity statute, a natural*
16 *person must **both** be a citizen of the United States and be domiciled within the State.”*
17

18
19 This was expressly cited by the Court in a prior filing. Plaintiff has relied on this
20 controlling standard and presented uncontradicted evidence that A) the nerve center is California,
21 B) The controlling members of Defendant are non-American Citizens and are of Danish
22 citizenship only and C) Defendant’s CEO’s are domiciled in **California**, defeating diversity
23 jurisdiction, to which Plaintiff had notified Defendant (Exhibit SET2-N) and Defendant had
24 continued on despite.
25

26
27 **CONCLUSION**
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1 The above matters are subject to judicial notice under FRE 201(b). They are either:

- 2 • Public records, corporate disclosures, or filings.
- 3 • Social media statements made by the Defendant and controlling officers.
- 4 • Metadata and forensic evidence directly tied to the filings in this action.
- 5 • Judicially noticeable facts regarding geography, business operations, and domicile.

6 Plaintiff respectfully requests the Court grant this Request for Judicial Notice in full.

7
8
9 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
10 that this is a true and correct copy of a document I personally received, created, or obtained in
11 connection with this case, and it has not been materially altered.
12

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14 Executed this 26 day of June, 2025 in Santa Clarita, California.
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19 Matthew R. Walsh

20 Plaintiff in pro p
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1 **PROOF OF SERVICE**

2 I, Matthew R. Walsh, declare:

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

5 On July 3, 2025, I served the following document(s):

6 **REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS MOTION TO
7 STRIKE DEFENDANTS REMOVAL**

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

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

10 Heather Valencia, Esq.

11 Hvalencia@reedsmith.com

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

14 Executed on July 3, 2025

15 Santa Clarita, California

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18 _____
19 Matthew R. Walsh
20 Plaintiff In Pro Per
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