

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

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

Hearing date: TBD
Hearing time: TBD

**SUPPLEMENTAL DECLARATION OF
MATTHEW R. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION TO STRIKE
DEFENDANTS REMOVAL [SET 1]**

SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH
IN SUPPORT OF PLAINTIFF'S MOTION TO STRIKE
DEFENDANTS REMOVAL AND SUBSEQUENT FILINGS [SET 1]

I, Matthew R. Walsh, declare as follows:

I am the Plaintiff in the above-captioned matter. I submit this supplemental declaration in further support of my **MOTION TO STRIKE DEFENDANTS REMOVAL**. I have personal

18 knowledge of the facts set forth herein and, if called to testify, could and would competently do
19 so.

20

21 **BACKGROUND**

22

23 1. This action arises from Plaintiff Matthew R. Walsh’s claims against Defendant Rokoko
24 Electronics and its affiliated entities and individuals. Defendant has filed a Notice of
25 Removal to federal court, asserting grounds that Plaintiff contends are procedurally and
26 substantively defective. Plaintiff now seeks to strike that removal and all associated
27 filings based on evidence showing Defendant’s significant and longstanding presence in
28 California, and the improper conduct of Defendant’s legal representatives.

29

30 2. From as early as 2015, Defendant’s CEO relocated to San Francisco to launch what
31 became Rokoko, originally branded under the name “Salto,” through a Kickstarter
32 campaign. Since then, Defendant has continuously represented a base of operations in
33 California. Defendant’s CEO and co-founders have publicly identified their residence and
34 business activities as centered in San Francisco and the greater Los Angeles area,
35 including purchasing real estate, attending business conferences, incorporating entities,
36 and soliciting funding.

37

38 3. Defendant has maintained physical offices and staff in both San Francisco and Los
39 Angeles, regularly advertised shipping from U.S. warehouses, and catered to a
40 California-based consumer market. Defendant further opened U.S. bank accounts,

41 operated subsidiaries, and accepted substantial investments through California channels,
42 including from the Los Angeles-based firm Naver Z.

43
44 4. In parallel, Defendant’s removal filing and associated pleadings were executed and
45 submitted by individuals who were not admitted to practice before this Court and lacked
46 pro hac vice status, including Michael Galibois and Emily Graue. Despite repeated meet
47 and confer efforts by Plaintiff, Defendant’s counsel continued involving these unadmitted
48 attorneys in official legal communications, filings, and appearances, raising serious
49 questions about unauthorized practice of law and the legitimacy of the removal filing
50 itself.

51
52 5. The evidence demonstrates not only that Defendant is deeply rooted in California for
53 jurisdictional purposes, but also that its removal was filed through irregular and improper
54 channels, undermining its validity.

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56 **EXHIBITS IN SUPPORT OF DECLARATION**

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58 **1. EXHIBIT SET1-A: COMPANY ESTABLISHED IN SF IN 2015**

59 2. Defendant CEO founded the company in San Francisco in 2015 under the name “Salto,”
60 prior to it becoming Rokoko.

61 **3. EXHIBIT SET1-B: DEFENDANT MOVES TO SAN FRAN, NO INTENT TO**
62 **RETURN BACK TO DENMARK**

63 In 2016, Defendant CEO admitted relocating to San Francisco and stated he had no return
64 ticket to Denmark.

65

66 **4. EXHIBIT SET1-C: DEFENDANT MOVES INTO HIS 3RD S.F. AREA HOME**

67 5. Defendant CEO purchased a \$2.1M home in Sausalito, CA after leaving his prior home in
68 Noe Valley, CA.

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70 **6. EXHIBIT SET1-D: DEFENDANT FLEW HIS STAFF TO S.F. FOR FOUNDING**

71 7. Defendant CEO met his team in San Francisco to found Rokoko and promote it at
72 TechCrunch.

73

74 **8. EXHIBIT SET1-D.1: DEFENDANT'S INTERVIEW FROM S.F.**

75 9. TechCrunch interviews in San Francisco confirming the founding and promotion of
76 Rokoko.

77

78 **10. EXHIBIT SET1-E: DEFENDANT FOUNDING COMPANY IN S.F. IN 201**

79 11. Defendant promoted Rokoko's Kickstarter campaign from "San Fran" in 2015.

80

81 **12. EXHIBIT SET1-F: DEFENDANT OPENS S.F. SUBSIDIARY IN 2015 IN PERSON**

82 13. Defendant admitted opening a U.S. subsidiary in San Francisco in 2015, including legal
83 counsel and co-founder presence.

84 **14. EXHIBIT SET1-G: Defendant wins \$100k in Hollywood**

85 15. Defendant CEO stated he won \$100,000 at a Hollywood/LA-based event.

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16. EXHIBIT SET1-H: Defendant celebrating wives birthday in SF and interview

17. Defendant celebrated his wife’s birthday in San Francisco and published an interview in Oakland the same day.

18. EXHIBIT SET1-I: Danish reporting on Defendant’s \$93M investment

19. Vision Denmark interview: \$93M raised through LA-based Naver Z.

20. EXHIBIT SET1-I.1: Defendant welcomes Naver Z post- investmnet

21. Defendant welcomed Naver Z for their investment.

22. EXHIBIT SET1-J: Defendant lists his domicile on Facebook as San Francisco

23. Defendant’s Facebook lists him in “San Francisco, CA.”

24. EXHIBIT SET1-K: Defendant’s co-founder also lists SF as his domicile on Twitter

25. Defendant’s co-founder lists “San Francisco, CA” as his location on Twitter/X.

26. EXHIBIT SET1-L: Defendant opened a California-based warehouse

27. Defendant email showing they opened a U.S.-based warehouse post-litigation.

28. EXHIBIT SET1-L.1: Defendant’s website shows domestic shipping

29. Defendant website advertising shipping from the U.S.

109 **30. EXHIBIT SET1-M: Defendant offers U.S.-only payment plans**

110 31. Defendant offers monthly payments for U.S.-only customers because it is his primary
111 business location and target market.

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113 **32. EXHIBIT SET1-N: Defendant lists customers-all California, no Delaware**

114 33. Defendant's customer base appears focused on California—no mention of Denmark or
115 Delaware.

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117 **34. EXHIBIT SET1-O: Defendant lists LA and SF but not Delaware on his website**

118 35. Defendant lists staffed offices in San Francisco and Los Angeles on its website.

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120 **36. EXHIBIT SET1-P: Defendants website, no Delaware office listed.**

121 37. Defendant lists Copenhagen, San Francisco, and Athens as business locations—no
122 mention of Delaware.

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124 **38. EXHIBIT SET1-Q: Defendant's bank account near the SF office**

125 39. Defendant banks with Silicon Valley Bank, located near their San Francisco office.

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127 **40. EXHIBIT SET1-R: Defendant omitted Rokoko, LLC from the Court.**

128 41. Defendant created both Rokoko, LLC and Rokoko Electronics, Inc. around the same
129 time—pattern of shell entities.

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131 **42. EXHIBIT SET1-S: Defendant is more Cali. Than Denmark and Delaware x2**

132 43. Visual aid: Defendant is more “California” than “Denmark + Delaware” combined.

133

134 **44. EXHIBIT SET1-T: UPL evidence: acting as active counsel post-removal**

135 45. Unadmitted attorney continued acting as counsel after being removed from the docket.

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137 **46. EXHIBIT SET1-U: UPL evidence: acting as active counsel post-removal**

138 47. Same as above—unauthorized attorney participated after removal.

139

140 **48. EXHIBIT SET1-V: Plaintiff removed unadmitted counsel from email chain**

141 49. Plaintiff removed unauthorized counsel from email chain and gave notice.

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143 **50. EXHIBIT SET1-X: Unadmitted counsel made to act as official representatives**

144 51. Admitted counsel directed unauthorized counsel to act as official representative; false
145 meet-and-confer statements included.

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147 **52. EXHIBIT SET1-X.1: Unadmitted counsel continued signing docs after removal**

148 53. Unauthorized counsel signed documents after court removal, using “PHV forthcoming.”

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150 **54. EXHIBIT SET1-X.2: Unadmitted counsel’s names continued to be used on docs**

151 55. Unauthorized names continued to be added to filings, despite known status.

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153 **56. EXHIBIT SET1-Y: Removal cover sheet – not by a legally practicing attorney**

154 57. Removal cover sheet lists only Michael Galibois—unadmitted, no PHV.

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58. EXHIBIT SET1-Z: Forged signature on the removal cover sheet

59. Galibois signed the removal sheet under Ellena’s name; not authentic.

60. EXHIBIT SET1-ZA: Galibois forged Ellena’s name on filing

61. Court record confirms only Ellena is admitted; Galibois forged her name on filing.

62. EXHIBIT SET1-ZB: Local counsel keeps adding unadmitted counsel to emails

63. Counsel repeatedly adds unauthorized attorneys to email chains, implying team representation.

64. EXHIBIT SET1-ZC: Article: Rokoko chooses Silicon Valley (misleading Danish Govt. to secure a DKK 19,000,000 investment)

65. TechSavvy article: “Rokoko chooses Silicon Valley” while misleading Danish government about nerve center.

66. EXHIBIT SET1-ZD: Bloomberg lists Defendant as CEO of it’s own investor

67. Bloomberg lists Defendant CEO as CEO of North East Ventures ApS, used to entice Naver Z.

68. EXHIBIT SET1-ZE: Defendant receives strategic third-party investment from masked company he controls according to Bloomberg

177 69. Nordic9 article: \$3M raised from Naver Z, Danish government, and a company
178 Defendant controls.

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180 **70. EXHIBIT SET1-ZF: Copenhagen HQ is simply an intentional façade for alter egos**

181 71. “Headquarters” in Copenhagen is a locked cellar with a sticker; widely used for shell
182 entities.

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184 **72. EXHIBIT SET1-ZG: Defendant didn’t need money – investment round with a self-**
185 **controlled masked company was to entice a big investor**

186 73. TechCrunch interview: investment wasn’t needed—just to secure Naver Z; third-party
187 investor is CEO-controlled.

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189 **74. EXHIBIT SET1-ZH: Defendant has a history of Inc. & LLC sword/shield shells**

190 75. Defendant CEO’s shell companies (ApS and IVR) often share the same non-functional
191 address.

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193 **76. EXHIBIT SET1-ZI: Defendant’s COO/CFO Overby also has many alter-ego shells**

194 77. Defendant’s COO/CFO also operates shell/holding companies registered at the same
195 address.

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197 **78. EXHIBIT SET1-ZJ: Defendant’s co-founder also has many alter-ego shells**

198 79. Co-founder operates overlapping shell/holding companies tied to the same address.
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200 **80. EXHIBIT SET1-ZK: Plaintiff asks Counsel why they keep adding removed attys.**

201 81. Plaintiff requested clarification on unauthorized counsel being silently re-added—no
202 response.

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204 **82. EXHIBIT SET1-ZL: Plaintiff challenged diversity and removed attys**

205 83. During meet-and-confer, Plaintiff again challenged diversity and unauthorized counsel—
206 no reply.

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208 **84. EXHIBIT SET1-ZM: Plaintiff again challenged removed attys being added to emails**

209 85. Plaintiff again removed unauthorized counsel from the thread and questioned ongoing
210 participation.

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212 **86. EXHIBIT SET1-ZN: Plaintiff requests explanation of unauthorized atty's**

213 87. Final request from Plaintiff to explain unauthorized participation—no response,
214 submitted as implied admission.

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216 **88. EXHIBIT SET1-NO: Defendant registered to CEO's S.F. apartment**

217 89. Defendant originally registered the California entity to his San Francisco apartment; later
218 changed to Westlake Village.

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220 **90. EXHIBIT SET1-NP: Map: Defendant's apartment to the bank**

221 91. Driving distance between Defendant's San Francisco apartment and Silicon Valley Bank:
222 4.2 miles.

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92. EXHIBIT SET1-NQ: Map: Defendant’s office is blocks from his bank

93. Defendant’s mailbox “office” is just blocks from his bank account in the Bay Area.

94. EXHIBIT SET1-NR: Plaintiff argues about meet and confer failures

95. Plaintiff argues with Defense counsel about failures to meet and confer and failures to adhere to law regarding the improper removal to federal.

96. EXHIBIT SET1-NS: Private investigator photo: 400sq/ft headquarters, no staff, no machinery or production equipment.

97. Private investigator in Denmark photographed the interior of Defendant’s headquarters. 400sqft, no staff in existence, no operations, no machinery, limited hardware (which Defendant said does not exist there), Defendant arrived and left within 10 minutes mid-work day and didn’t return.

98. EXHIBIT SET1-NT: Private investigator photo: delivery notice on door

99. Plaintiff hired a private investigator to take pictures of Defendant’s headquarters in Copenhagen. This image shows a delivery notice, ROKOKO company sign on the door, multiple Rokoko logo stickers on the door as well.

100. EXHIBIT SET1-NU: Private investigator photo: Locked gate

101. Defendant locked the gate behind him, further proving no staff are inside. This location is simple storage, some sort of worktop with basic tools and a mailbox for

246 Rokoko, The Parallel Company, Rokoko Care, J Balslev Holdings, M Sondegaard
247 Holdings, M Overby Holdings. Not a nerve center.

248

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

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Matthew R. Walsh

Plaintiff In Pro Per

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255 **EXHIBIT SET1-A**

256 Defendant CEO essentially founded his company in 2015 in San Francisco, even prior to it being
257 called "Rokoko" it as called "Salto"; a kickstarter product.



258 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
259 that this is a true and correct copy of a document I personally received, created, or obtained in
260 connection with this case, and it has not been materially altered.
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262 Executed this 19 day of June, 2025 in Santa Clarita, California.
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-C

Defendant CEO bought a new home in Salsalito, CA (for est. \$2,100,000) upon leaving his previous home in Noe Valley. Defendant advertised the open house.

Danes in San Francisco & Bay Area - DABGO · Join
Jakob Balslev · January 9, 2019 · 🌐

Vores lille familie flytter fra vores skønne cottage i hjertet af Noe Valley d. 15 januar, fordi vi har brug for lidt mere plads til vores meget aktive søn på snart 1 år. Stedet har været på danske hænder de seneste par år, fordi vores landlady har et soft spot for vores folkefærd og godt kan lide at leje ud til danskere:) Fantastisk beliggenhed og enormt hyggeligt lille hus - hvis nogen i denne gruppe leder efter bolig, kan vi varmt anbefale at kigge nærmere. Som altid på boligmarkedet i SF skal man være forberedt på at rykke hurtigt, hvis man skal have en chance.
Åbent hus på lørdag fra 11-12 🍷

Our little family moving from our lovely cottage in the heart of Noe Valley d. January 15, because we need a little more space for our very active almost 1 year old son. The place has been in Danish hands the last few years, because our landlady has a soft spot for our people's behavior and likes to rent it out to Danes 😊 Great location and hugely cozy little house - if anyone in this group is looking for accommodation, we highly recommend that look closer. As always in the ... [See more](#)

⚙️ · [Hide Translation](#) · [Rate this translation](#)

SFBAY.CRAIGSLIST.ORG
STUNNING TWO STORY VICTORIAN COTTAGE NEWLY REMODED
OPEN HOUSE: Saturday January 12th (11:00am to 12:00pm) 1484 Sanchez at 28th St. Please ca...

👍 1 comment

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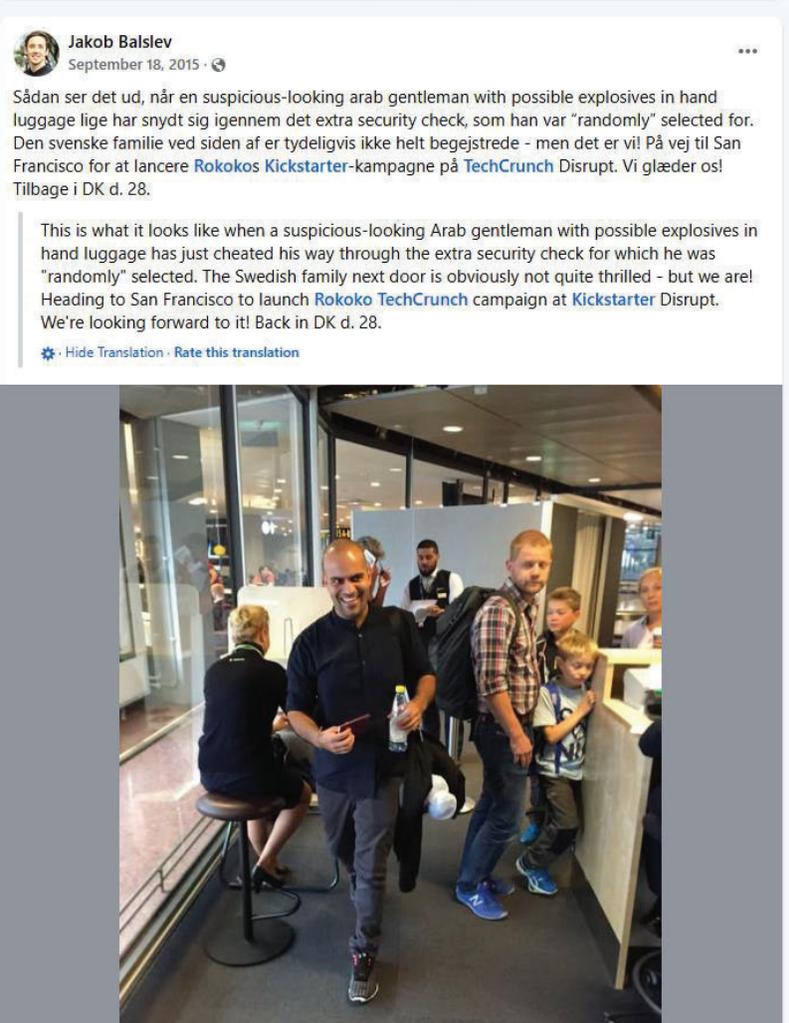
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-D

Defendant CEO at the airport meeting the rest of his team in San Francisco to found Rokoko and promote it at TechCrunch’s upcoming event.



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Plaintiff in pro per

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EXHIBIT SET1-D.1

Defendant CEO doing interviews after the 3 day event in San Francisco to found and promote his new Company.



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Plaintiff in pro per

330 **EXHIBIT SET1-E**

331 Defendant stating “from a very early morning here in San Fran” while promoting his kickstarter
332 campaign in 2015.



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341 Matthew R. Walsh
342 Plaintiff in pro per

343 **EXHIBIT SET1-F**

344 Defendant making express admissions that in 2015 he opened a “US subsidiary company” in San
345 Francisco, pictured is his lawyer, and the co-founder whose social media also lists San Francisco
346 as his domicile.



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Plaintiff in pro per

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EXHIBIT SET1-G

Defendant stating he was in Hollywood/LA and won \$100,000 at an event.



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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-H

Defendant celebrating his wives birthday – in San Francisco – and sharing an interview published with Wired magazine in Oakland on the same day.

Jakob Balslev
May 9, 2017 · 🌐

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

Rokoko
May 9, 2017 · 🌐

"Motion capture this good usually costs hundreds of thousands of dollars...Rokoko's Smartsuit Pro, on the contrary, puts the entire studio set-up into one \$2,500 suit."... [See more](#)



WIRED.COM

The Rokoko Smartsuit Brings Motion Capture to the Masses
The \$2,500 device makes motion capture as easy as suiting up.

8 comments

Like Comment Send

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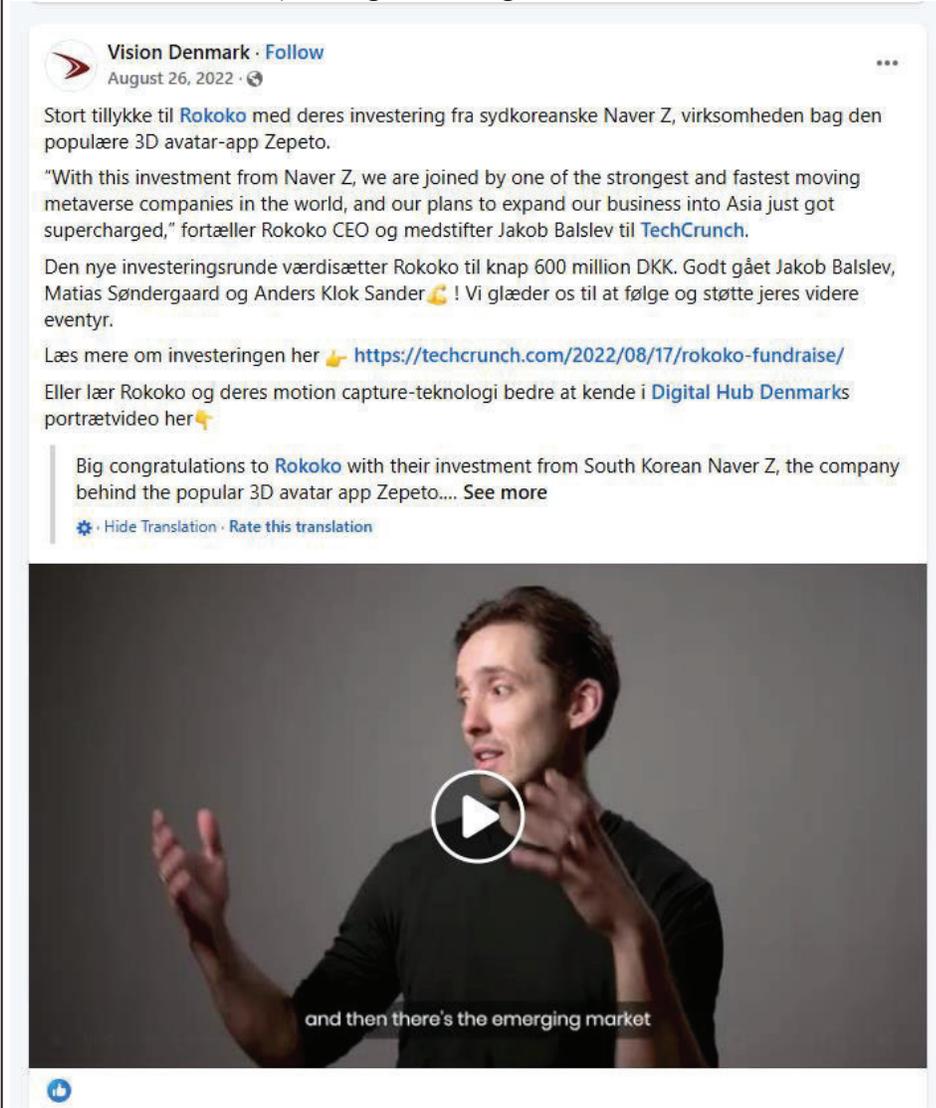
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-I

A Vision Denmark interview with Defendant’s CEO for procuring DK 600,000,000 (about \$93,000,000.00 USD) through Los Angeles located Naver Z.



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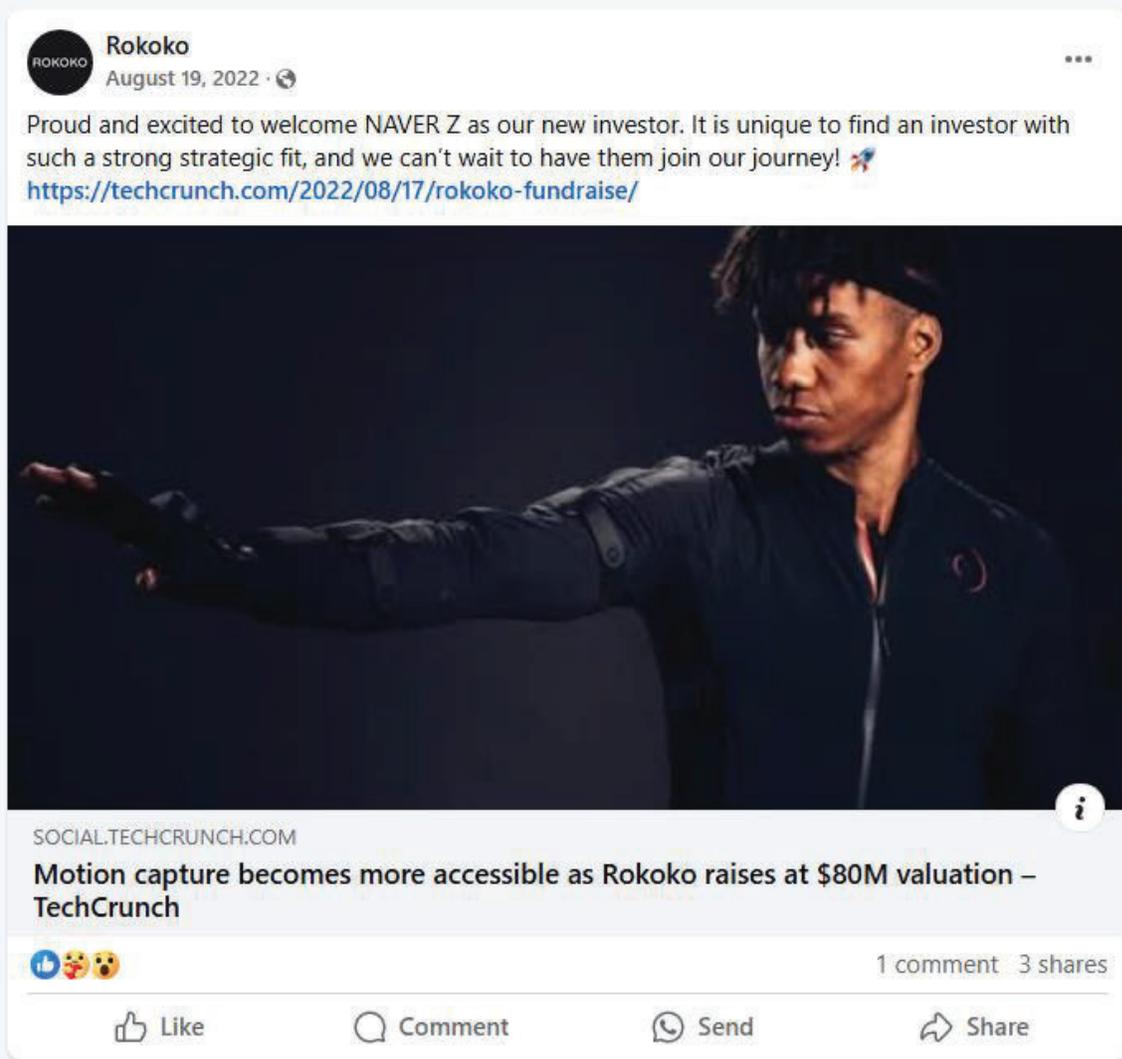
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EXHIBIT SET1-I.1

Defendant welcoming Los Angeles based Naver Z for investing about \$93,000,000.00 USD.



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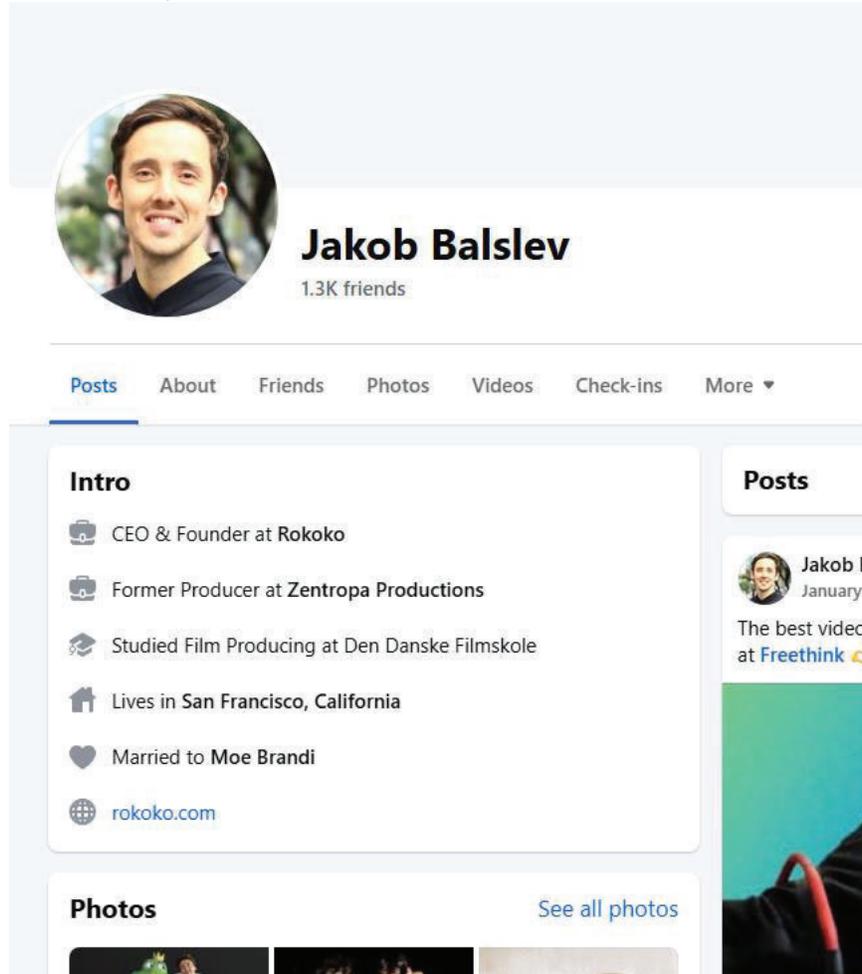
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EXHIBIT SET1-J

A current screenshot of Defendant’s Facebook page in which he lists his role at Rokoko and his domicile as “San Francisco, CA”



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EXHIBIT SET1-K

Defendant’s co-founder lists his domicile as San Francisco, CA on his X/Twitter page.

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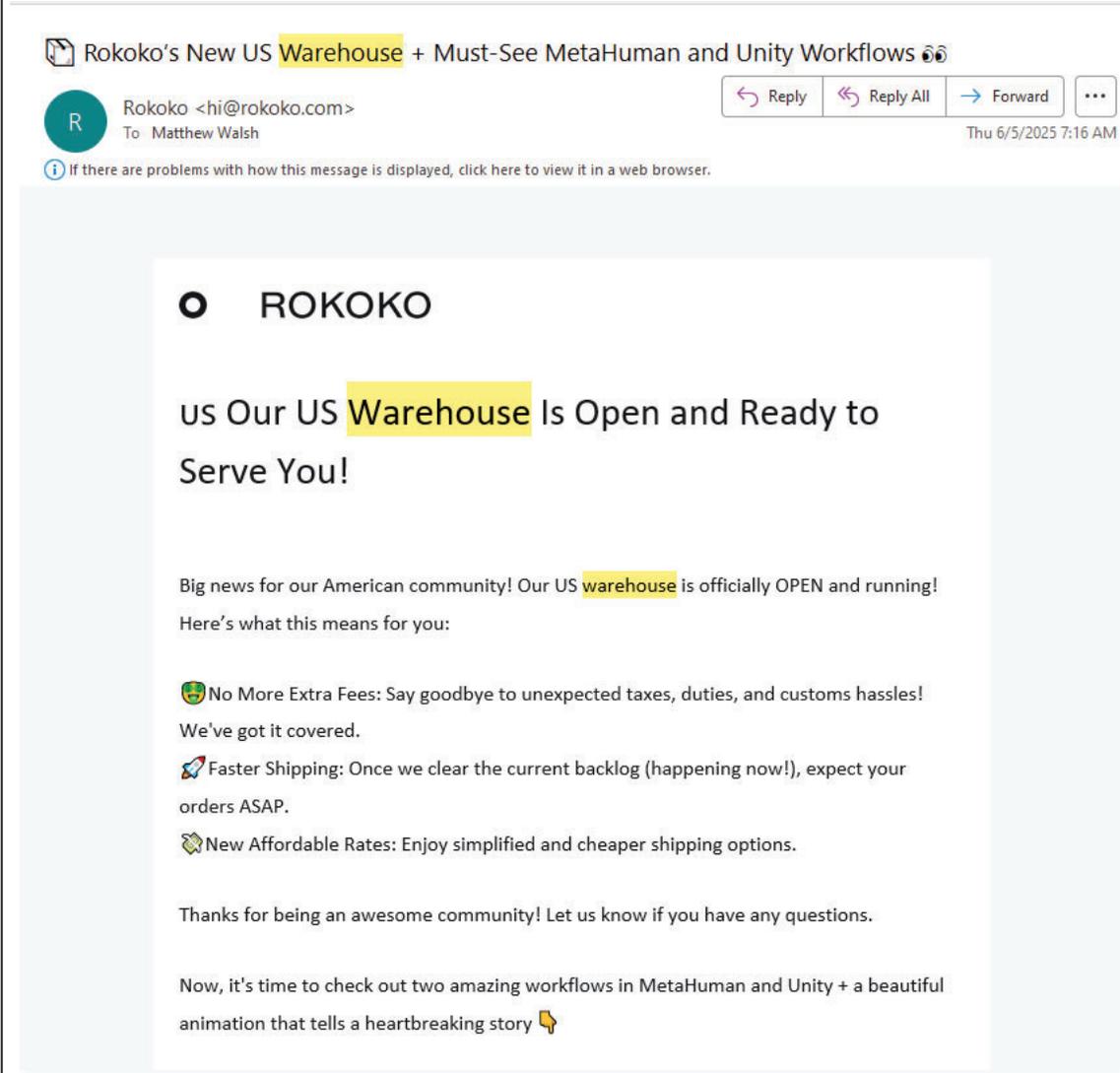
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Plaintiff in pro per

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EXHIBIT SET1-L

Defendant’s e-mail, post-litigation which shows they have opened a California-based warehouse for U.S. distribution.



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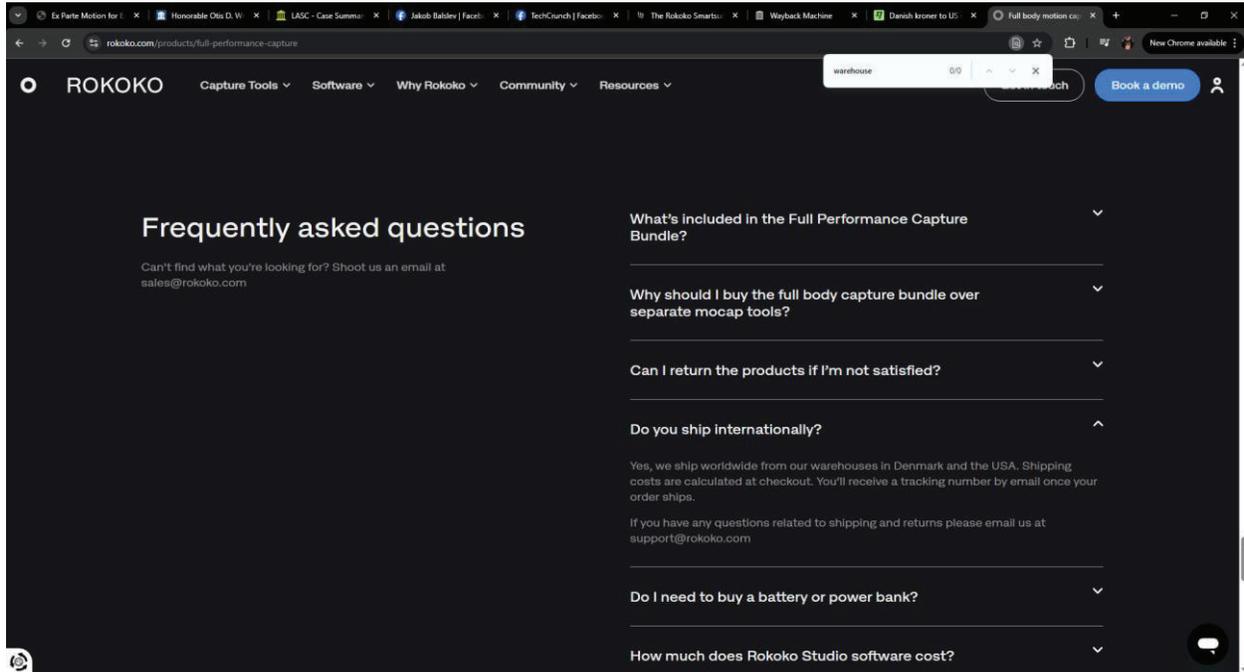
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EXHIBIT SET1-L.1

Defendant’s website showing they advertise shipping from USA.



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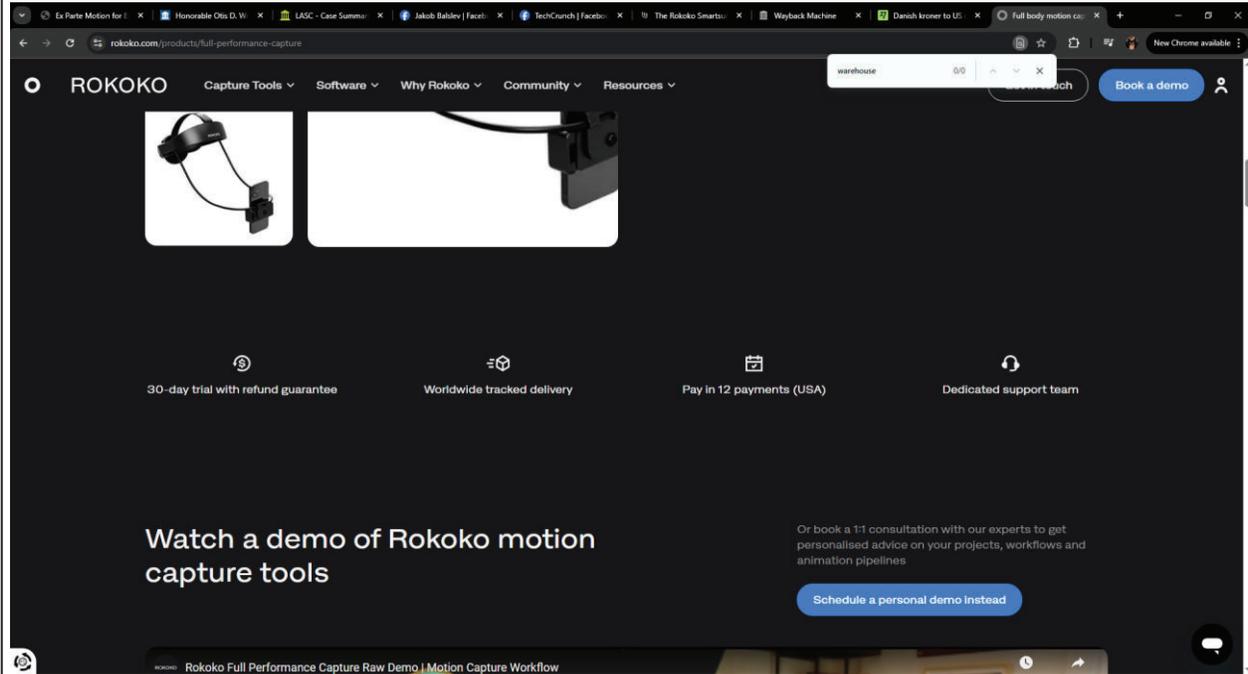
Matthew R. Walsh
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EXHIBIT SET1-M

Defendant's website showing they offer monthly payment plans for US-only customers.



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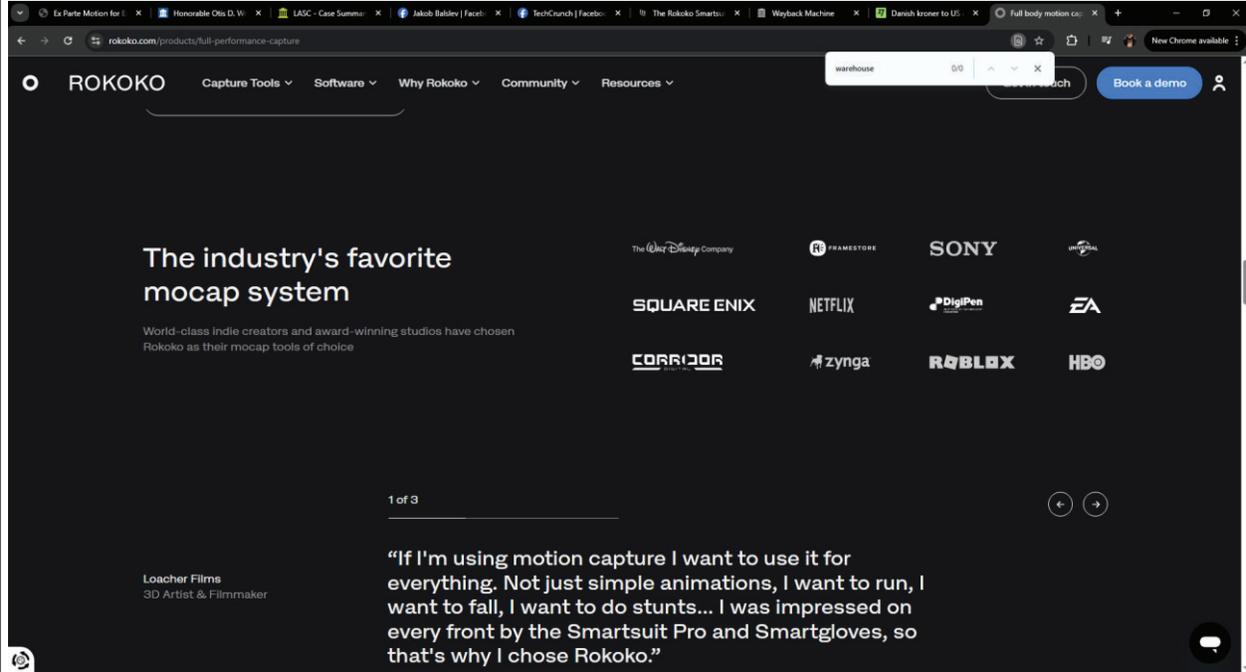
Matthew R. Walsh
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EXHIBIT SET1-N

Defendant showing his customer base is California-based, no mention of Denmark or Delaware customers anywhere.



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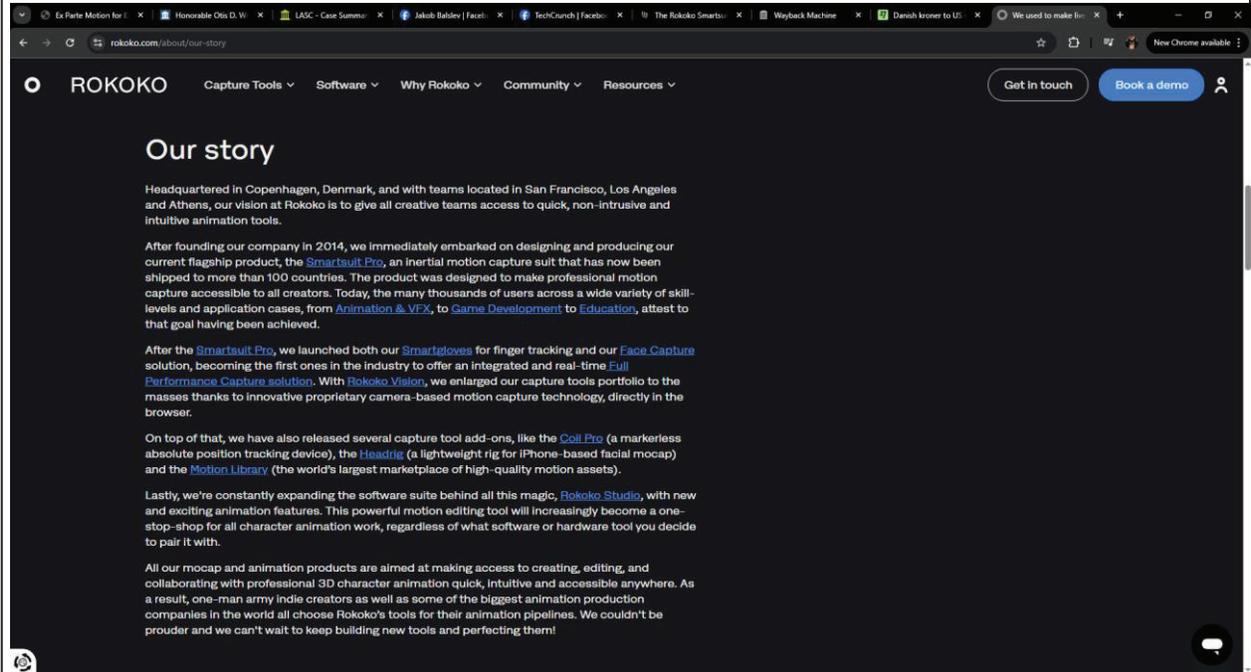
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-O

Defendant’s website now and always has listed that they have offices in San Francisco and Los Angeles and that those offices are staffed with “teams”.



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

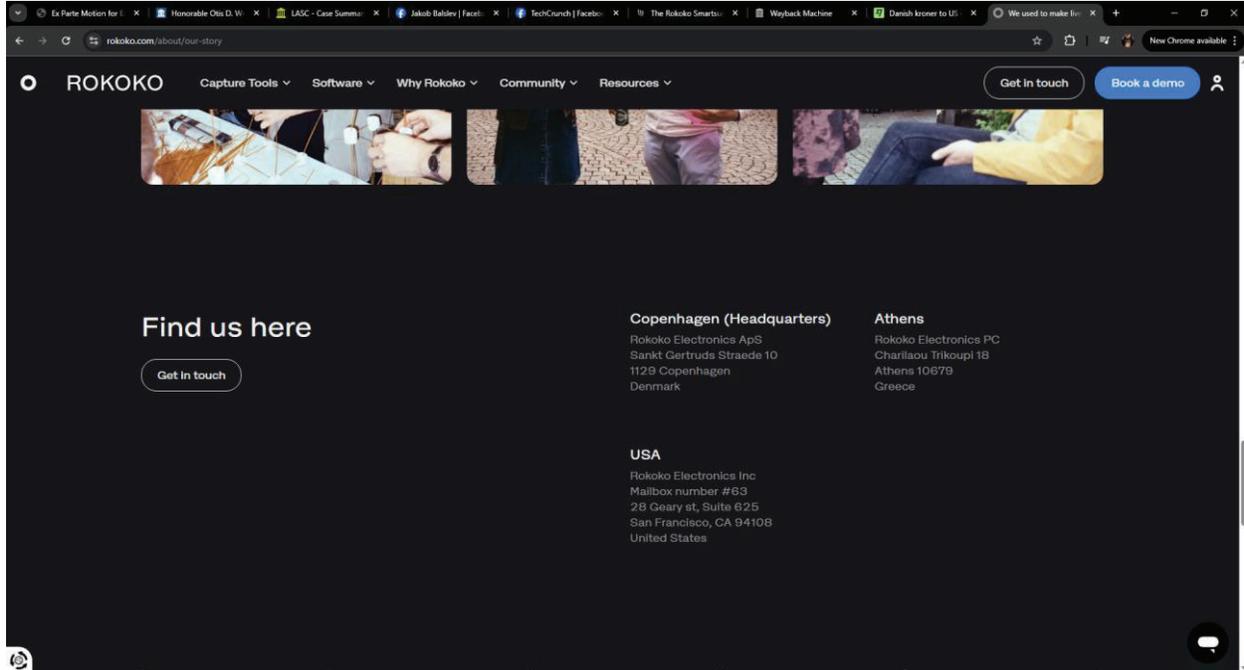
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-P

Defendant lists Copenhagen, San Francisco and Athens as their business locations – no mention of Delaware.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-Q

Defendant banks with Silicon Valley Bank located just blocks from his San Francisco office.

Your Rokoko Quote #D2465



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

Reply Reply All Forward

Tue 4/15/2025 2:18 AM

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



QUOTE #D2465

Accept your quote

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

Account name: Rokoko Electronics

Silicon Valley Bank, 3003 Tasman Drive, Santa Clara, CA 95954

ABA: 121140399

Account: 3301333454

SWIFT: SVBKUS6S

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

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

[Accept your quote](#)

or [Visit our store](#)

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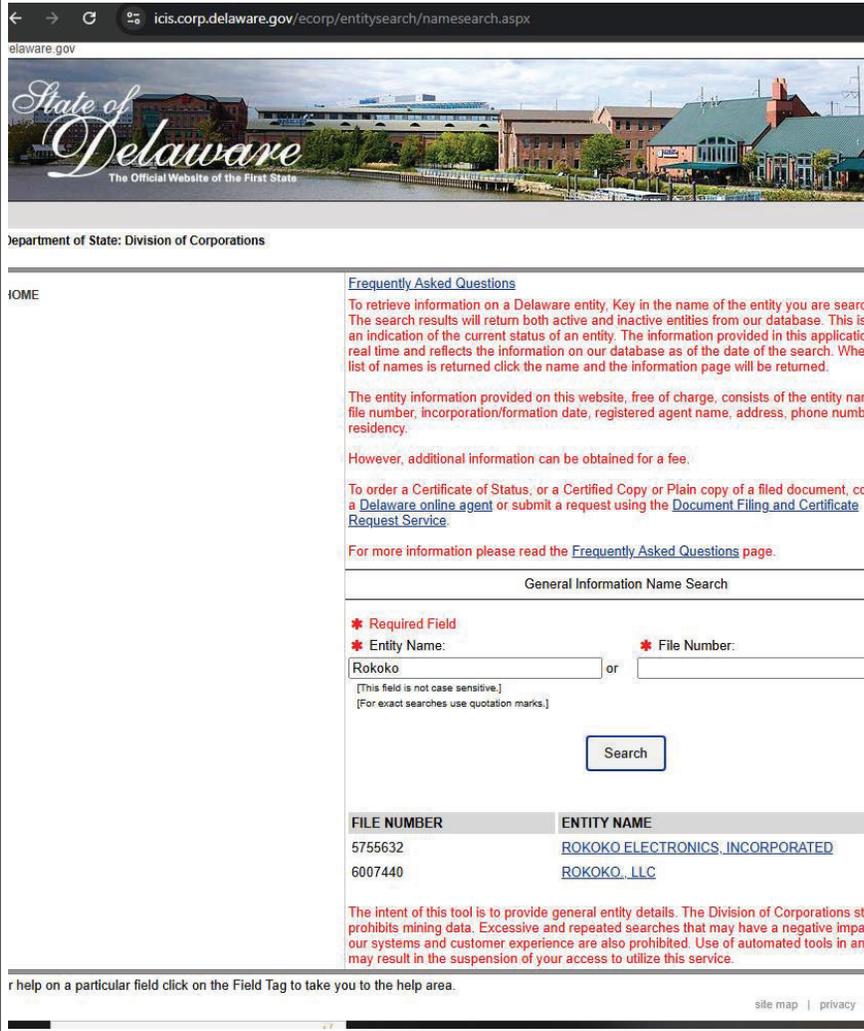
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-R

Defendant and counsel omitted that Defendant has both Rokoko, LLC and Rokoko Electronics, Inc. filed in a proximate date and time to each other. Defendant has a history of forming identical “Inc” and “LLC” shells; or in the Danish equivalent: “ApS” and “IVR”



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Executed this 19 day of June, 2025 in Santa Clarita, California.

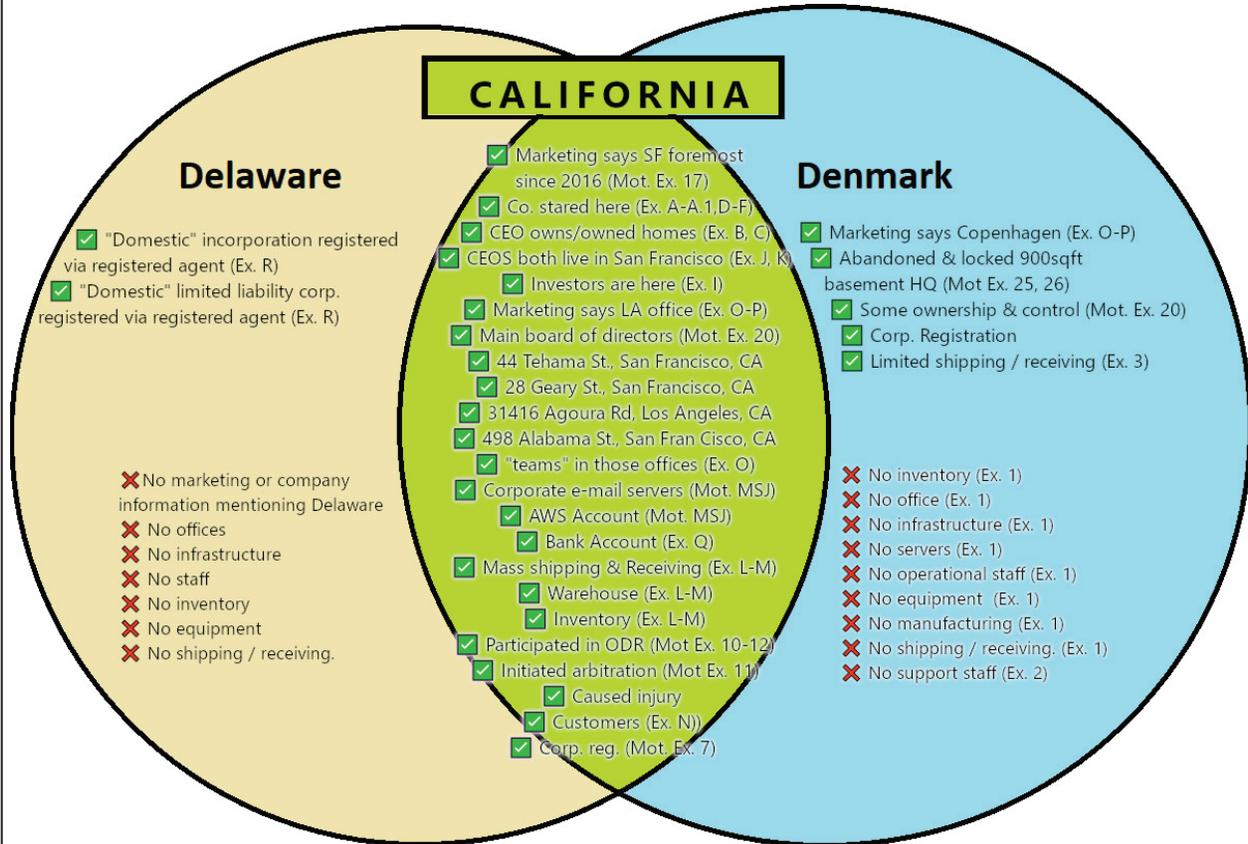
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Matthew R. Walsh
Plaintiff in pro per
PAGE 33

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EXHIBIT SET1-S

A visual aid showing Defendant is more California than Delaware and Denmark combined x2.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-T

Defendant’s counsel allowing an unadmitted attorney with no pro hac vice status to continue acting as active counsel even after being removed from the docket.

RE: Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



Graue, Emily H. <EGraue@reedsmith.com>
To: matthew@winteryear.com
Cc: Galibois, Michael B.; Ellena, Katherine J.

Reply Reply All Forward

Mon 6/16/2025 3:38 PM

Thanks for your note, Mr. Walsh. We understand you’re not inclined to agree with any points of law or fact we offer. That’s ok. Both sides can agree to disagree. Not uncommon at all—we can let the court to decide. But as you asked for our position, it is clear that removal divests the state court of jurisdiction until your remand motion is decided in federal court. The state court equally will understand this point. So, we intend to oppose your remand motion. If remand is denied (which is our position it clearly should be), then the matter will proceed in federal court. If remand is granted (as is your position), the matter would be remanded to proceed then in state court.

Hope this is helpful at least in confirming our position.

In the interim, with respect to electronic service in federal court, please see C.D. Cal. Local Rule 5-3 and note that the parties are required to follow this rule. Separately, any state court filing is improper for the reasons set forth above and so we do not consent to electronic service.

Best,

Emily Graue
Associate
Global Commerical Disputes
She/Her/Hers

EGraue@reedsmith.com
D: +1 312 207 2954
M: +1 630 895 1773

Reed Smith
10 South Wacker Drive
Chicago, IL 60606-7507
T: +1 312 207 1000
F: +1 312 207 6400
reedsmith.com

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, June 16, 2025 4:46 PM
To: Graue, Emily H. <EGraue@reedsmith.com>
Cc: Galibois, Michael B. <MGalibois@reedsmith.com>; Ellena, Katherine J. <KEllena@reedsmith.com>
Subject: RE: Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing

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



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Executed this 19 day of June, 2025 in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-U

Defendant’s counsel allowing an unadmitted attorney with no pro hac vice status to continue acting as active counsel even after being removed from the docket.

Notice - Ex Parte Application for Additional Time to Respond to the Complaint Filing



Graue, Emily H. <EGraue@reedsmith.com>
To: matthew@winteryear.com
Cc: Galibois, Michael B.; Ellena, Katherine J.

Reply Reply All Forward

Mon 6/16/2025 2:15 PM

You replied to this message on 6/16/2025 2:46 PM.

Mr. Walsh,

Defendant Rokoko Electronics, via counsel Reed Smith LLP, will be filing an Ex Parte Application for Additional Time to Respond to the Complaint today, June 16, 2025, pursuant to Local Rule 8-3. This was also indicated when we spoke on the phone earlier. If you wish to oppose this motion, you must respond within 24 hours. Please let us know if you have any questions or would like to discuss further.

Best,

Emily Graue
Associate
Global Commerical Disputes
She/Her/Hers

EGraue@reedsmith.com
D: +1 312 207 2954
M: +1 630 895 1773

Reed Smith
10 South Wacker Drive
Chicago, IL 60606-7507
T: +1 312 207 1000
F: +1 312 207 6400
reedsmith.com

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021

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

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-V

Plaintiff removed Defendant’s unadmitted counsel from the e-mail chain notifying them that they are not allowed to practice law.

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 6/18/2025 7:48 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

From: Valencia, Heather R. <HValencia@ReedSmith.com>
Sent: Tuesday, June 17, 2025 6:30 PM
To: matthew@winteryear.com
Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: Matthew R. Walsh v. Rokoko Electronics et al

Good evening,

Please see the attached document.

DEFENDANT’S OPPOSITION TO PLAINTIFF’S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND MOTION TO STAY PROCEEDINGS

Thank you,

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Executed this 19 day of June, 2025 in Santa Clarita, California.

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-X

Defendant’s counsel/lead attorney states in her declaration that she directed unadmitted counsel with no pro hac vice status to perform as official counsel for Defendant. Further, Defendant’s counsel makes a false statement to the Court stating Plaintiff did not answer them during meet and confer, Plaintiff shows that this was materially false. – Further, she did not author this document herself, it was authored by unadmitted counsel.

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18 5. On June 12 and June 13, 2025, I instructed my colleague, Emily Graue, to call and
19 email Plaintiff to request his consent to a stipulation of time to respond to the Complaint. She did not
20 receive an answer. Attached hereto as **Exhibit 1** is a true and correct copy of Ms. Graue’s email to
21 Mr. Walsh.
22
23 6. On June 13, 2025, Plaintiff informed my office through a phone call that he intended
24 to oppose any motion for enlargement of time. Ms. Graue informed me that Plaintiff stated to her on
25 the phone that he “is going to oppose pretty much everything.”
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Executed this 19 day of June, 2025 in Santa Clarita, California.



Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-X.1

Unadmitted counsel with no pro hac vice status, removed from the docket continued signing their names to documents with the legal nullity “PHV forthcoming” and further; with the date showing it was after that removal and Court notice. This document, and the signature was placed by the unadmitted counsel, not Katherine.

5 6 7 8 9 10 11 12	P e State of Delaware	DATED: June 16, 2025	REED SMITH LLP	By: <u>/s/ Katherine J. Ellena</u> Katherine J. Ellena Michael Galibois (PHV forthcoming) Emily Graue (PHV forthcoming)	
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Executed this 19 day of June, 2025 in Santa Clarita, California.



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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-X.2

Defendant’s counsel continued adding Michael Galibois name and the word “Attorneys” for Defendant; although Michael was not admitted and knowingly according to this document – did not have pro hac vice status.

REED SMITH LLP <small>A limited liability partnership formed in the State of Delaware</small>	1 Michael Galibois (<i>pro hac vice forthcoming</i>) mgalibois@reedsmith.com 2 Emily Graue (<i>pro hac vice forthcoming</i>) egraue@reedsmith.com 3 Reed Smith LLP 10 S Wacker Drive 4 Floor 40 Chicago, IL 60606 5 Telephone: +1 312 207 1000 Facsimile: +1 312 207 6400 6 Katherine J. Ellena (SBN 324160) 7 kellena@reedsmith.com REED SMITH LLP 8 515 South Flower Suite 4300 9 Los Angeles, CA 90071-1514 Telephone: +1 213 457 8000 10 Facsimile: +1 213 457 8080 11 <i>Attorneys for Defendant</i> <i>Rokoko Electronics</i> 12 13 14 15 MATTHEW R. WALSH 16 Plaintiff, 17 vs.	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA Case No.: 2:25-cv-05340-ODW-RAO [Assigned to Hon. Otis D. Wright, II, Courtroom 5D] [PROPOSED] ORDER GRANTING
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-Y

The removal cover sheet which states only one attorneys name “Michael Galibois”; an unadmitted attorney, not of record, with no pro hac vice status. Michael did not sign this document and Katherine’s name does not appear in the filing other than by signature.

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

I. (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>)		DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>)	
Matthew R. Walsh		Rokoko Electronics	
(b) County of Residence of First Listed Plaintiff <u>Los Angeles</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small>		County of Residence of First Listed Defendant <u>Deleware</u> <small>(IN U.S. PLAINTIFF CASES ONLY)</small>	
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.		Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Reed Smith LLP Michael Galibois (SBN 6272257); 10 S Wacker Drive, Floor 40, Chicago IL, 60606 Telephone: +1 213 457 8000, Facsimile: +1 213 457 8080	
II. BASIS OF JURISDICTION (Place an X in one box only.)		III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)	
<input type="checkbox"/> 1. U.S. Government Plaintiff	<input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party)	Citizen of This State	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1
<input type="checkbox"/> 2. U.S. Government Defendant	<input checked="" type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2
		Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3
		Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
		Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5
		Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6
IV. ORIGIN (Place an X in one box only.)			
<input type="checkbox"/> 1. Original Proceeding	<input checked="" type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened
<input type="checkbox"/> 5. Transferred from Another District (Specify)	<input type="checkbox"/> 6. Multidistrict Litigation - Transfer	<input type="checkbox"/> 8. Multidistrict Litigation - Direct File	
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Check "Yes" only if demanded in complaint.)			
CLASS ACTION under F.R.Cv.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No MONEY DEMANDED IN COMPLAINT: \$ >\$75,000			
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 28 U.S.C. Sections 1332, 1441, and 1446; dispute arising out of Plaintiff's claim for damages due to tortious interference, fraud, intellectual property theft, breach of warranty, and related claims by Defendant			
VII. NATURE OF SUIT (Place an X in one box only.)			
<input type="checkbox"/> OTHER STATUTES	<input type="checkbox"/> CONTRACT	<input type="checkbox"/> REAL PROPERTY CONT	<input type="checkbox"/> IMMIGRATION
<input type="checkbox"/> PRISONER PETITIONS	<input type="checkbox"/> PROPERTY RIGHTS		

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Executed this 19 day of June, 2025 in Santa Clarita, California.



Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZA

The Court record shows only Katherine J. Ellena was admitted to practice, yet Michael filed the removal cover sheet in his name; with a forged signature of hers.

515 South Flower Street, Suite 4300
Los Angeles, CA 90071
213-457-8000
Fax: 213-457-8080
Email: kellen@reedsmith.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant
Does
1 through 50, inclusive

Date Filed	#	Docket Text
06/12/2025	1	NOTICE OF REMOVAL from Los Angeles Superior Court, case number 25STCV13828 Receipt No: ACACDC-39895326 - Fee: \$405, filed by Defendant ROKOKO ELECTRONICS. (Attachments: # 1 Exhibit 1 - Complaint, # 2 Exhibit 2 - Proof of Service of Summons, # 3 Exhibit 3 - Case Docket, # 4 Exhibit 4 - Declaration of Overby) (Attorney Katherine Jane Ellena added to party ROKOKO ELECTRONICS(pty:df))(Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025	2	CIVIL COVER SHEET filed by Defendant ROKOKO ELECTRONICS. (Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025	3	CORPORATE DISCLOSURE STATEMENT AND NOTICE OF INTERESTED PARTIES filed by Defendant ROKOKO ELECTRONICS (Ellena, Katherine) (Entered: 06/12/2025)
06/12/2025		CONFORMED COPY OF COMPLAINT against Defendants Does 1 through 50, inclusive, Rokoko Electronics, filed by Plaintiff Matthew R. Walsh. Filed in State Court on 5/12/2025 Submitted with Attachment 1 Exhibit 1 to Notice of Removal 1 (car) (Entered: 06/15/2025)
06/12/2025		CONFORMED COPY OF PROOF OF SERVICE OF SUMMONS AND COMPLAINT Executed by Plaintiff Matthew R. Walsh, upon Defendant Rokoko Electronics served on 5/14/2025, answer due 6/4/2025. Service of the Summons and Complaint were executed upon David Doe in compliance with California Code of Civil Procedure by personal service. Filed in State Court on 5/14/2025 Submitted with Attachment 2 Exhibit 2 to Notice of Removal 1 (car) (Entered: 06/15/2025)
06/13/2025	12	NOTICE OF MOTION AND MOTION TO REMAND TO SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES filed by plaintiff Matthew R. Walsh. (lc) (Additional attachment(s) added on 6/16/2025: # 1 LODGED proposed remand order) (lc). (Entered: 06/16/2025)
06/13/2025	13	NOTICE OF MOTION AND MOTION TO SHORTEN TIME TO HEAR PLAINTIFF'S MOTION TO REMAND 12 filed by plaintiff Matthew R. Walsh. (lc) Modified on 6/18/2025 (lc). (Entered: 06/16/2025)
06/13/2025	14	MOTION FOR LEAVE TO FILE DOCUMENTS ELECTRONICALLY AS AN IN PRO PER LITIGANT PURSUANT TO LOCAL RULE 5-4.1.1 IN THIS CASE filed by plaintiff Matthew R. Walsh. (lc) (Entered: 06/16/2025)
06/15/2025	4	NOTICE OF ASSIGNMENT to District Judge Otis D. Wright, II and Magistrate Judge Rozella A. Oliver. (car) (Entered: 06/15/2025)
06/15/2025	5	NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM filed. (car) (Entered: 06/15/2025)
06/15/2025	6	Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge. (car) (Entered: 06/15/2025)
06/15/2025	7	NOTICE OF PRO HAC VICE APPLICATION DUE for Non-Resident Attorney Emily Graue. A document recently filed in this case lists you as an out-of-state attorney of record. However, the Court has not been able to locate any record that you are admitted to the Bar of this Court, and you have not filed an application to appear Pro Hac Vice in this case. Accordingly, within 5 business days of the date of this notice, you must either (1) have your local counsel file an application to appear Pro Hac Vice (Form G-64) and pay the applicable fee, or (2) complete the next section of this form and return it to the court at cacd_attyadm@cacd.uscourts.gov. You have been removed as counsel of record

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Executed this 19 day of June, 2025 in Santa Clarita, California.

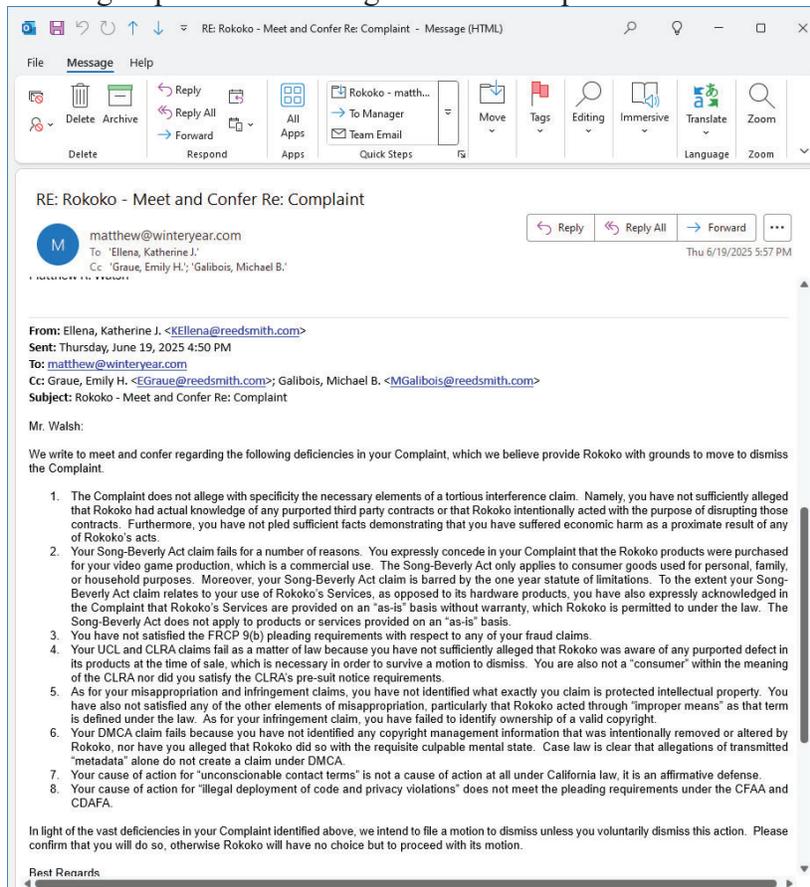
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZB

Defendant’s counsel once again adds unapproved attorneys Emily Graue and Michael Galibois to the e-mail chain after Plaintiff continues to remove them and references “we” continually implying there is still a group effort involving unauthorized practice of law.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

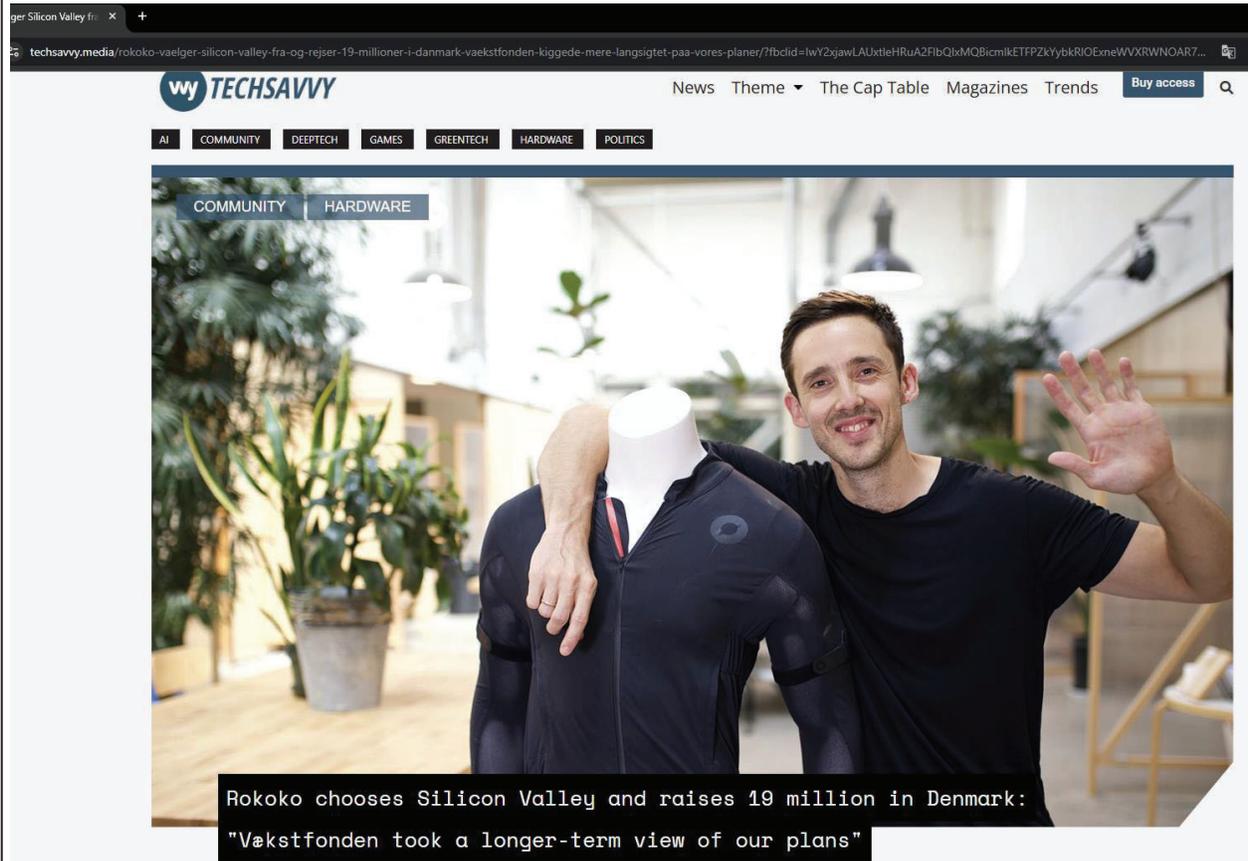
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZC

A Danish site TechSavvy did an interview with Defendant’s CEO, stating “Rokoko chooses Silicon Valley” – “and raises 19 million in Denmark”. The article goes on to state that Denmark’s requirement was that Rokoko’s nerve center be there, Defendant collected under false pretense to the Danish Government.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

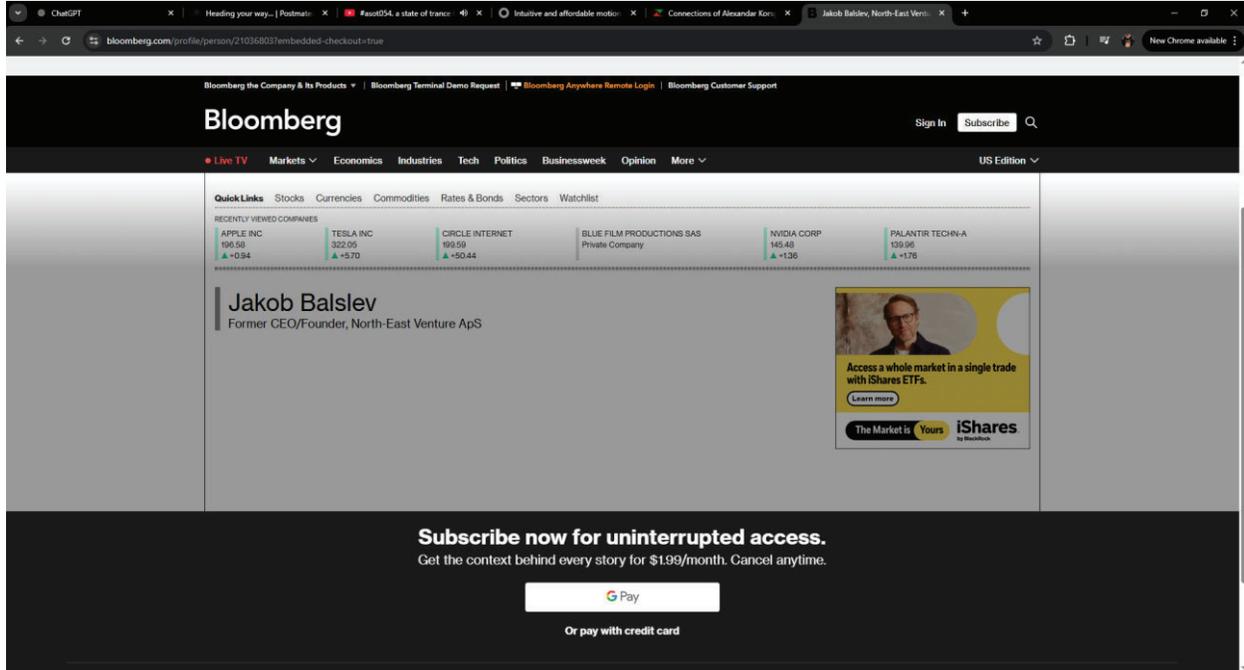
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZD

Bloomberg lists Defendant’s CEO as the CEO/Founder of North East Venture’s ApS; a company which invested in a “strategic investment round” that was not needed financially to entice the Danish Government and moreso \$93M investor Naver Z.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

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

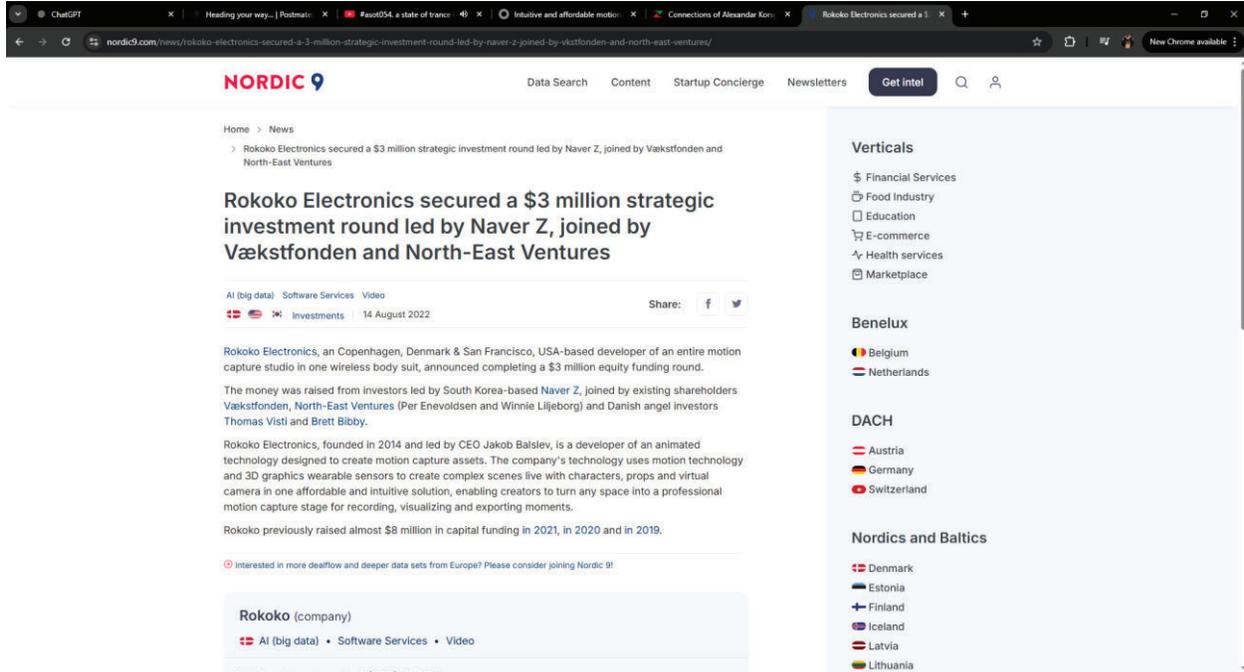
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZE

Nordic9 news site article showing Defendant raised \$3M from Naver Z, the Danish government and a Company that Bloomberg states – that Defendant is the CEO of.



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

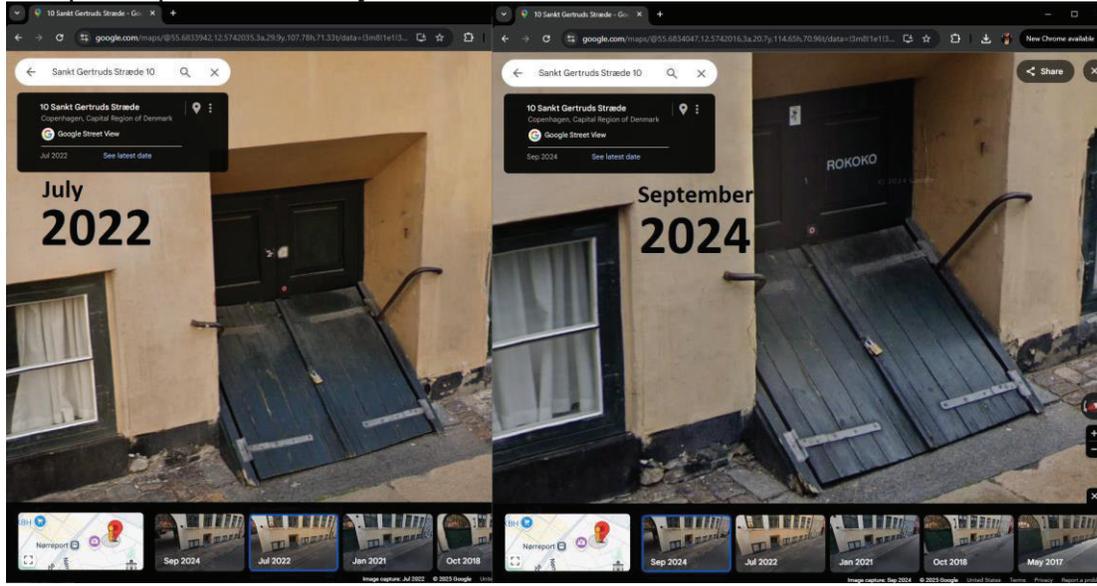
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZF

Defendant’s “headquarters” in Copenhagen. A 900sqft locked cellar basement door, in which the lock position has not changed in two years. Shortly after convincing the Danish government to invest DK 19,000,000 under the false pretense that Copenhagen was Defendant’s nerve center; Defendant placed a small “ROKOKO” sticker on the door for visitors. Defendant stated to Plaintiff -- this is not their HQ – it’s somewhere else. Most shell Companies and their holding Companies point to this very address.



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

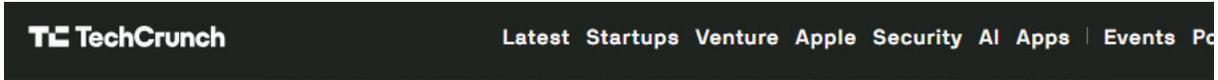
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZG

A TechCrunch interview with Defendant that states they didn't need the money, but wanted to entice Naver Z to invest about \$93,000,000.00 USD. One of the "third party investors" is North-East Ventures, which Bloomberg lists Defendant's CEO as the CEO of.



have to animate characters, without having to use a specialized studio with cameras that capture the movement, the suit itself tracks how the character is moving and translates that into movements that animators can use to animate their characters.

"We raised \$3m as it was primarily a strategic round to bring Naver Z in, and then some of our previous investors wanted to follow up too," said Jonathan Jeffery, director of growth at Rokoko, in an email. "We were profitable the entirety of last year so didn't have too much pressure on our back to raise a large round."

The funding round values Rokoko at over \$80 million, the company claims. The round was led by Naver Z, and the two existing lead investors, VF Venture and North-East Venture, both join the new round along with robotics specialist Thomas Visti (Universal Robots, MiR) and investment from new board member Brett Bibby.

"With this investment from Naver Z, we are joined by one of the strongest and fastest moving metaverse companies in the world, and our plans to expand our business into Asia just got supercharged," Rokoko CEO and co-founder Jakob Balslev said in an email to TechCrunch. "Naver Z is planning to open its Zepeto ecosystem to let animators monetize animations that they create using tools like the ones Rokoko offers."

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Executed this 19 day of June, 2025 in Santa Clarita, California.

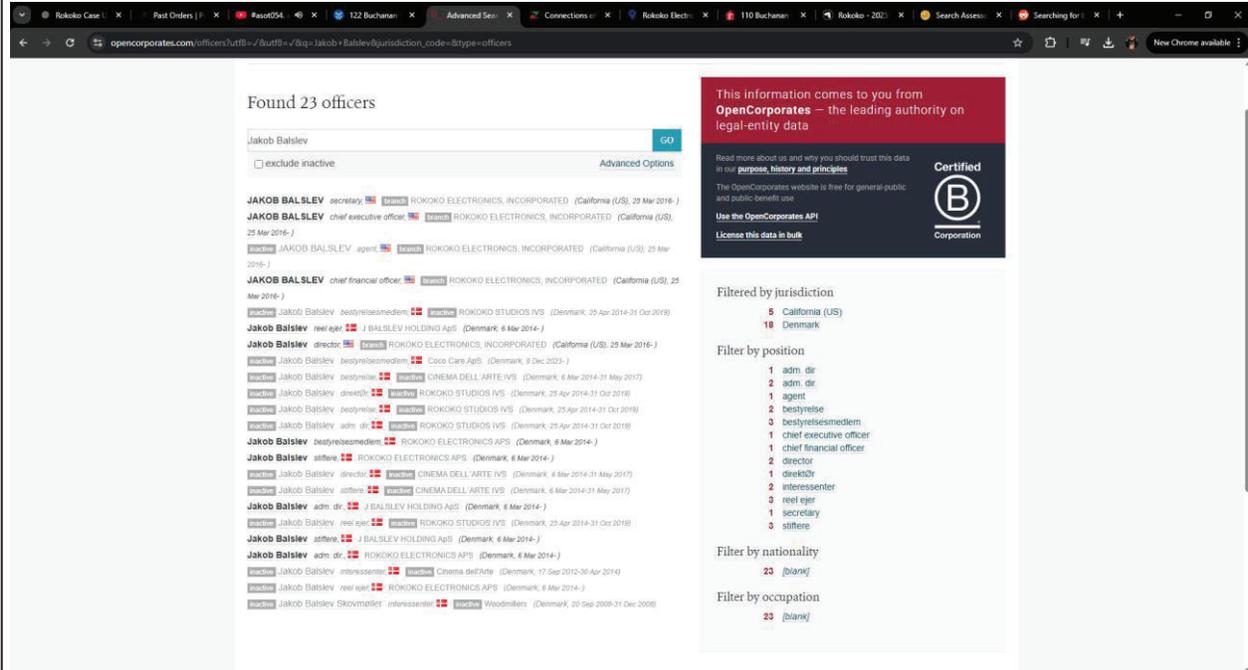
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZH

Defendant’s CEO’s various shell companies and holding companies including alter egos of “ApS” and “IVR”; similar to “Inc.” and “LLC” that he formed in Delaware. Most registration addresses point to the basement cellar office.



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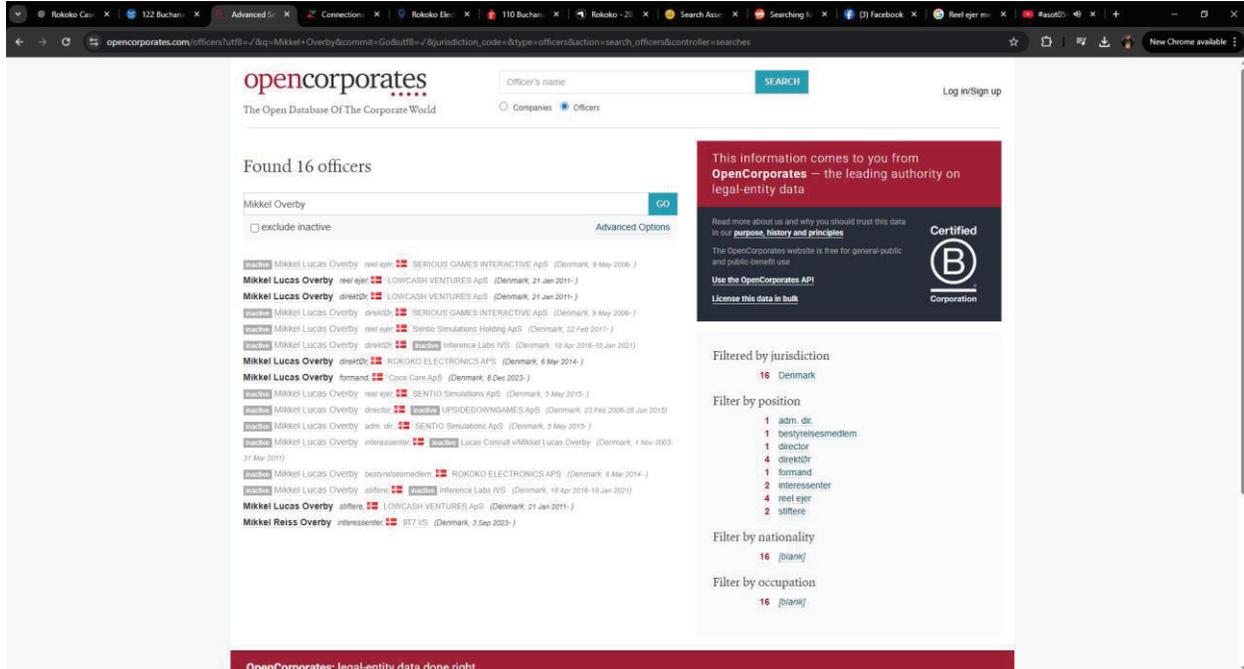
Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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885 **EXHIBIT SET1-ZI**

886 Defendant's COO/CFO's various shell companies and holding companies including alter egos
887 which commingle with the other owners. Most registration addresses point to the basement cellar
888 office.



889 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
890 that this is a true and correct copy of a document I personally received, created, or obtained in
891 connection with this case, and it has not been materially altered.
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893 Executed this 19 day of June, 2025 in Santa Clarita, California.
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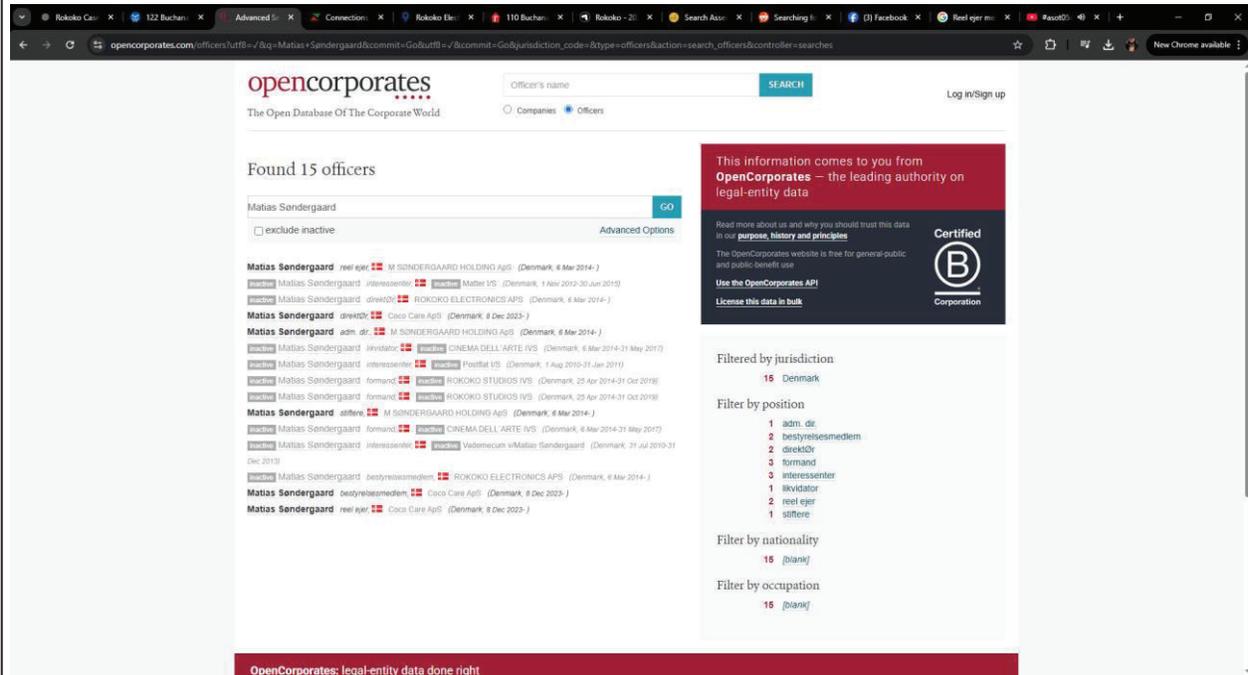
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZJ

Defendant’s co-founder’s various shell companies and holding companies including alter egos which commingle with the other owners. Most registration addresses point to the basement cellar office.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

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

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZL

Plaintiff during meet and confer challenging Defendant on diversity and once again asking counsel why she keeps re-adding unadmitted counsel to the e-mail chain silently and requesting that she clarify their roles. She never answers.

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

Thu 6/19/2025 5:21 PM

Actually, I'm saving the Court from a waste of judicial resources now and forthcoming by your firm.

Your suggestion that Plaintiff's contemplated motion to strike constitutes a "waste of judicial resources" is ironic, given the posture of this case.

It was your firm who elected to remove this matter to federal court while knowingly relying on two out-of-state attorneys who, at the time of filing, were neither admitted nor authorized to practice before this Court. In fact, neither Mr. Galibois nor Ms. Graue were properly added as attorneys of record until *after* their names appeared on signed pleadings — a procedural irregularity that this Court has already addressed via its notices.

Further, the jurisdictional basis for removal is facially defective. Your client is a California citizen for diversity purposes, and the individual defendants are Danish nationals, incapable of invoking 28 U.S.C. § 1332 as a matter of black-letter law. The removal was not only procedurally improper but factually indefensible.

If anything is taxing judicial resources, it is your client's continued attempts to stall adjudication through irregular filings, late pro hac vice applications, and ex parte motions that fail to address or acknowledge your team's procedural deficiencies.

Plaintiff is under no obligation to sit quietly while this Court's jurisdiction is misrepresented, or while unauthorized attorneys attempt to practice without leave. The contemplated motion to strike is not redundant — it serves to preserve the integrity of the judicial process, which your client (and you) appears determined to erode.

Also, why do you keep adding Michael and Emily to the e-mail chain? **They are not admitted counsel.** Are they continuing to work in a legal capacity for you? I am considering an inquiry.

I look forward to having the motion heard.

Thank you,
Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Thursday, June 19, 2025 4:56 PM
To: matthew@winteryear.com; Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZM

Plaintiff during meet and confer once again removing the unadmitted counsel from the e-mail chain and questioning why they keep acting as counsel after being removed - She never answers.

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

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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-ZN

Plaintiff during meet and confer once again asking counsel why she keeps re-adding unadmitted counsel to the e-mail chain silently and requesting that she clarify their roles or it will be submitted to the Court and taken as an admission of silence. She never answers.

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

Thank you.
Matthew R. Walsh

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Thursday, June 19, 2025 5:29 PM
To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>
Cc: 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>
Subject: RE: Rokoko - Meet and Confer Re: Complaint

Best of luck arguing that in front of a judge.

Why are Michael and Emily – once again -- in this e-mail chain? What is their role in this? Please state it for the record.

Once again, I must ask: why are Michael and Emily still included on these communications? They are not admitted to this Court, and their repeated participation raises serious questions. What is their current role here?

Please state it clearly, for the record.

Given their ongoing involvement, I will be filing an objection and moving to have both of their pro hac vice applications denied on the basis of repeated unauthorized appearances and filings prior to proper admission.

Matthew R. Walsh

From: Ellena, Katherine I. <KEllena@reedsmith.com>

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Executed this 19 day of June, 2025 in Santa Clarita, California.

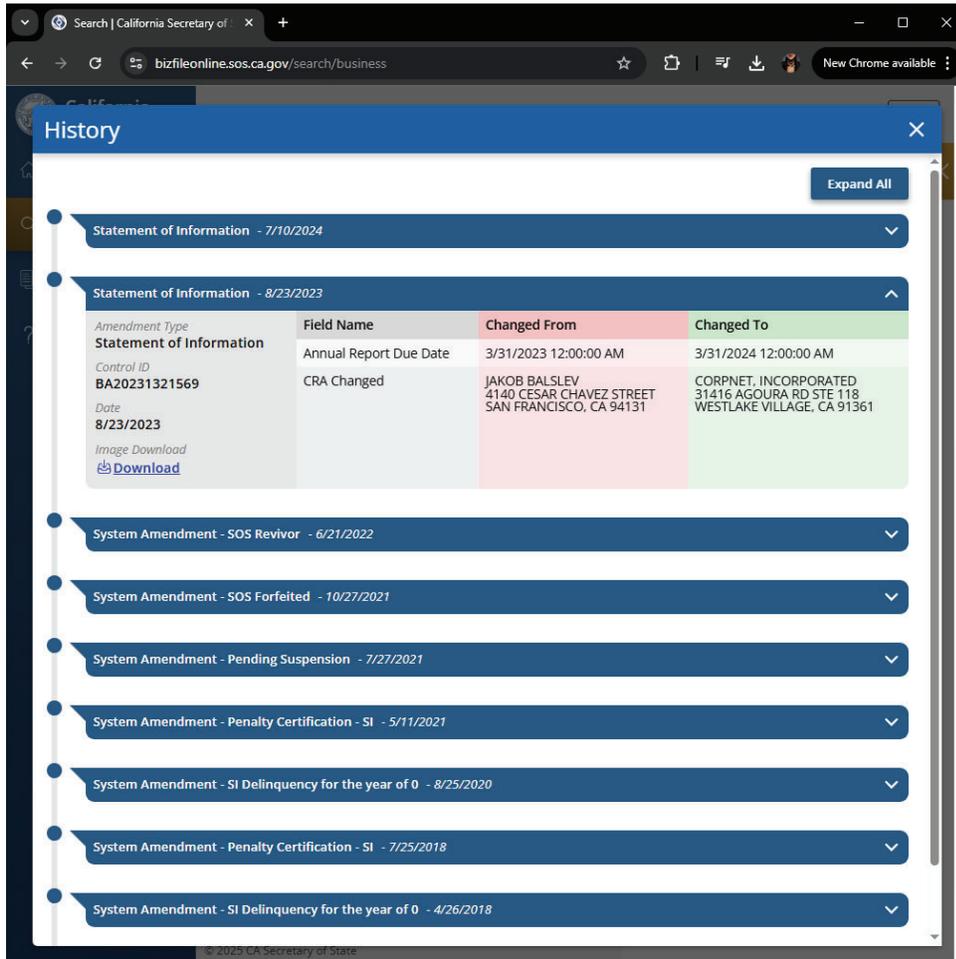
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Matthew R. Walsh
Plaintiff in pro per

EXHIBIT SET1-NO

Defendant’s CEO listed the California registration of Rokoko Electronics to his San Francisco apartment address. He then later changed it to a registered agent in Westlake Village, CA.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

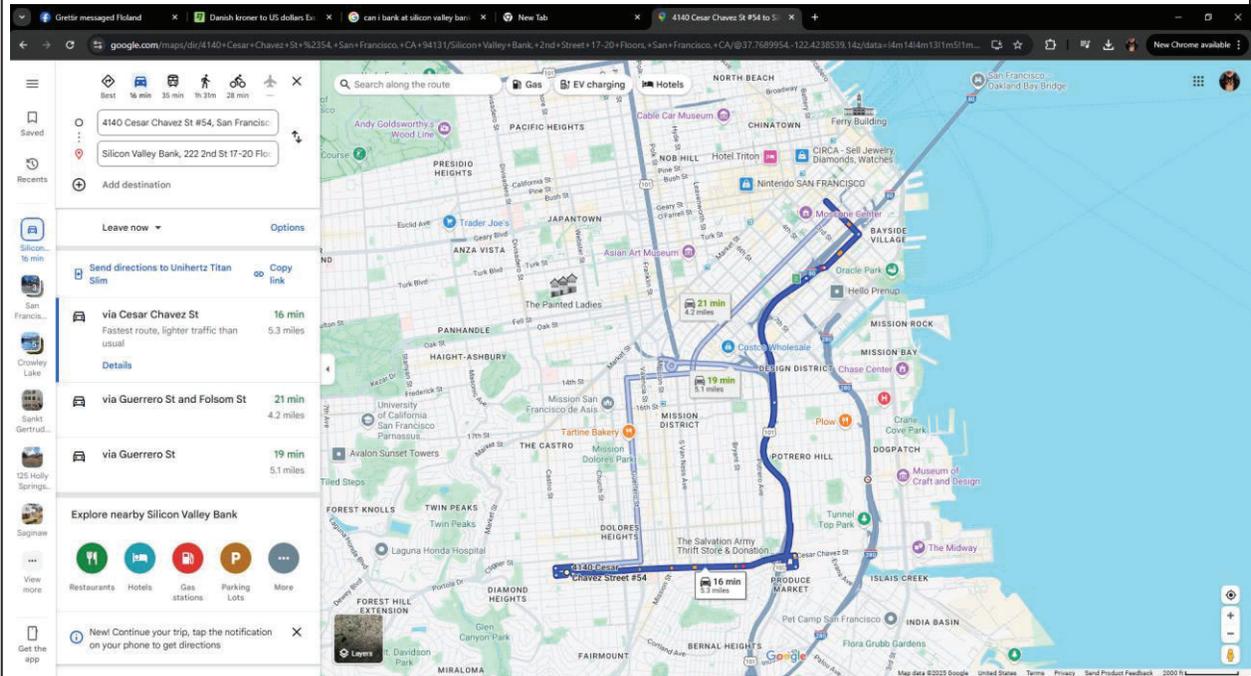
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NP

The driving distance between Defendant’s apartment in San Francisco and his Silicon Valley Bank Account: 4.2 miles.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

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

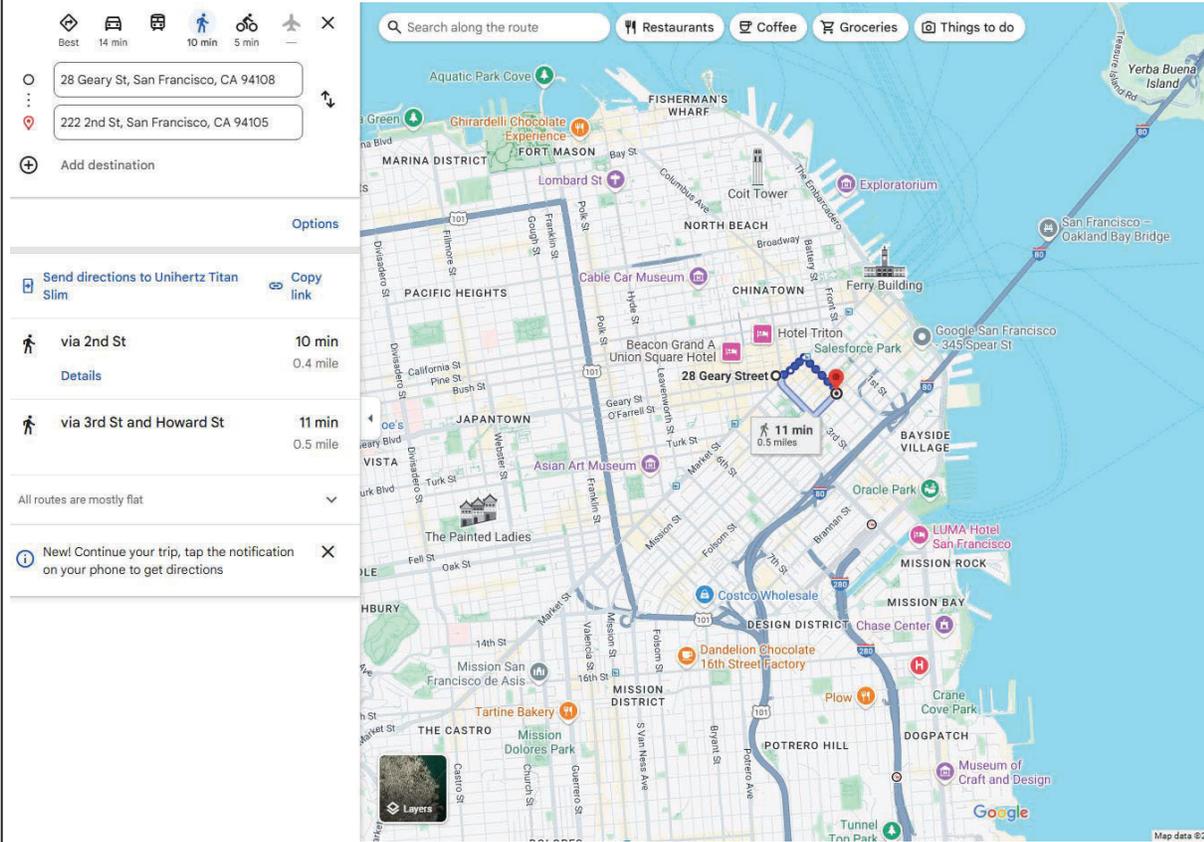
Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NQ

Defendant’s mailbox “office” is a few blocks from his bank account in the bay.



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Executed this 19 day of June, 2025 in Santa Clarita, California.

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NR

Defendant’s counsel admitting they stopped “meeting and conferring”; but through manufactured reasoning. Plaintiff once again notifying them that they failed to meet and confer continually, demanded they produce proof to the contrary and further notifying them that even Court-provided caselaw said diversity of citizenship is dead on arrival. She also continually says “we”; which means the unadmitted attorneys.

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



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

Reply Reply All Forward ...

Wed 6/25/2025 7:26 PM

Ah, your hearsay statement again.... Inventing things that didn't happen is not dispute resolution, but, it seems par from the course for you 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 7:13 PM

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

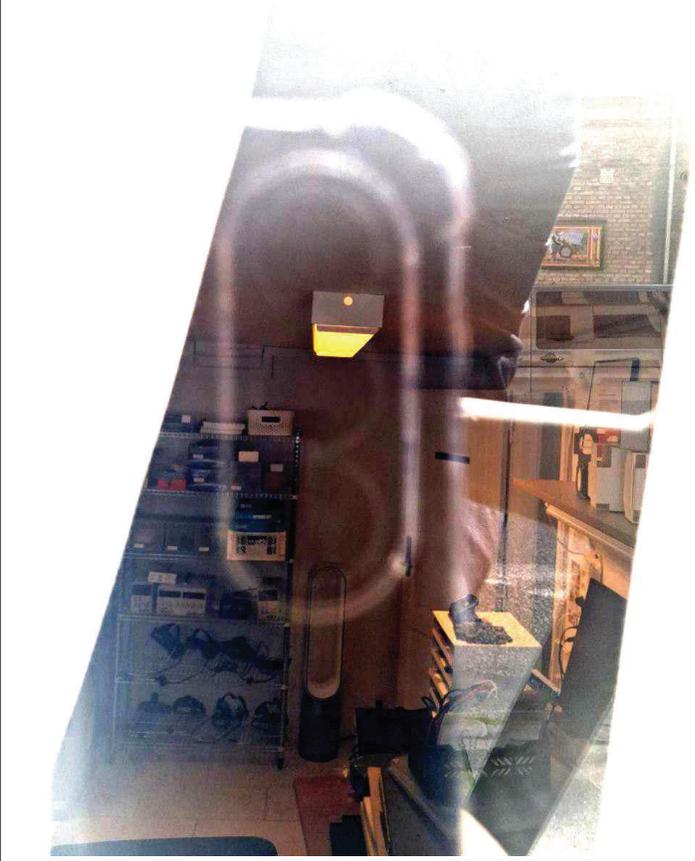
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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NS

Plaintiff hired a private investigator to take pictures of Defendant’s headquarters in Copenhagen. It is a 400sqft makeshift storage room/single person office. The only person to come and go did so in less than 10 minutes and locked the gate behind them. No staff is on premises during work hours. Visible are four Rokoko Headcams as inventory which Defendant said does not exist at this location and further said this is not their office.



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

Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NT

Plaintiff hired a private investigator to take pictures of Defendant’s headquarters in Copenhagen. This image shows a delivery notice, ROKOKO company sign on the door, multiple Rokoko logo stickers on the door as well.



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

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

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Matthew R. Walsh
Plaintiff in pro per

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EXHIBIT SET1-NU

Plaintiff hired a private investigator to take pictures of Defendant’s headquarters in Copenhagen. Defendant arrived on bicycle mid-day, went into the unit for 10 minutes, came back out and locked the door and gate then left on bicycle. No staff exists at the headquarters.



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

A handwritten signature in black ink, appearing to read "Matthew R. Walsh". The signature is written in a cursive style and is positioned above a horizontal line.

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Matthew R. Walsh
Plaintiff in pro per

1104 **PROOF OF SERVICE**

1105 I, Matthew R. Walsh, declare:

1106
1107 I am a resident of the State of California, over the age of eighteen years, and a party to this
1108 action. My business address is 19197 Golden Valley Rd #333, Santa Clarita, CA 91387.
1109

1110 On July 3, 2025, I served the following document(s):

1111
1112 **SUPPLEMENTAL DECLARATION OF MATTHEW R. WALSH IN SUPPORT OF**
1113 **PLAINTIFF’S MOTION TO STRIKE DEFENDANTS REMOVAL [SET 1]**
1114

1115 by transmitting a true copy via electronic mail to the following email address(es):

1116 **Reed Smith LLP (Counsel for Defendant)**

1117 Heather Valencia, Esq.

1118 Hvalencia@reedsmith.com
1119
1120
1121

1122 I declare under penalty of perjury under the laws of the United States of America that the
1123 foregoing is true and correct.
1124

1125 Executed on July 3, 2025

1126 Santa Clarita, California

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1128 _____
1129 Matthew R. Walsh
Plaintiff In Pro Per