

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: August 18, 2025
Hearing time: 1:30PM

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

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

22
23 TO THE HONORABLE COURT:

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25 Pursuant to Federal Rule of Evidence 201(b), Plaintiff respectfully requests that the Court
26 take judicial notice of the following facts, each of which is either (1) not subject to reasonable
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1 dispute because it is generally known within this Court’s jurisdiction, or (2) can be accurately
2 and readily determined from sources whose accuracy cannot reasonably be questioned.
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5 This request supports Plaintiff’s Motion to Strike Defendant’s Notice of Removal and is
6 based on evidence contained within this document.
7

8 **REGARDING TIMING OF SUBMITTAL**
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10 Although FRE 201(d) & (e) allows judicial notice to be taken at any stage; Plaintiff offers
11 an explanation in good-faith as to the submittal of these documents at this time and juncture.
12 These documents were discovered *after* filing Plaintiff’s motion. Plaintiff intended on bringing
13 these issues for oral argument; however, the hearing was vacated and so Plaintiff had to quickly
14 re-collect evidence and assemble it in a short time. Plaintiff files this request in good-faith and
15 asserts that each of these materials and facts presented are readily within Defendant’s knowledge
16 and grasp and none can possibly be a surprise.
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21 **REGARDING DOCUSIGN EVIDENCE**
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24 The Court may take Judicial notice of the affidavit from DocuSign authenticating the
25 evidence within this RJN. Under FRE 803(6), the evidence is admissible and is self-
26 authenticating under FRE 902(11). As DocuSign is a worldwide trusted resource used even by
27 Governments; and that Plaintiff is utilizing only the metadata/IP address locations and times, that
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1 information is not subject to dispute. The evidence is admissible under Rule 201.
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5 **REQUEST FOR JUDICIAL NOTICE**
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8 As the motion is undecided before this Court, Plaintiff specifically requests judicial notice of the
9 following:
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12 **I. FACTS AND RECORDS SUPPORTING LACK OF DIVERSITY**
13 **JURISDICTION**
14

- 15
- 16 • **Exhibit 1** – Rokoko owns commercial property in San Francisco; property tax lien
 - 17 • **Exhibit 2** – Rokoko DocuSign with San Francisco Treasurer re: property taxes (Dec.
18 2024)
 - 19
 - 20 • **Exhibit 3** – Board member Stefano Corazza resides in California (noticed DOE); lack
21 of complete diversity
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 - 24 • **Exhibit 4** – CEO/CFO/Secretary Balslev registered company at San Francisco luxury
25 apartment residence through 2024; Hertz nerve center.
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- **Exhibit 5** – Creative Director Sam Lazarus resides/works in San Francisco; signs on behalf of Company; lack of complete diversity / Hertz nerve center
- **Exhibit 6** – Major equity holder Naver Z Limited is located in California, signs Docusign agreements with Defendant; lack of complete diversity
- **Exhibit 7** – CEO/CFO/Secretary Balslev lists himself at Rokoko San Francisco on employment records through 2025; Hertz nerve center.
- **Exhibit 8** – Defendant continued California hiring after 2020; job postings into 2022
- **Exhibit 9** – Defendant careers page shows active San Francisco hiring operations as of 2025
- **Exhibit 10** – Defendant website shows no mention of Delaware as place of business
- **Exhibit 11** – LinkedIn lists Denmark and San Francisco, not Delaware, as company locations
- **Exhibit 12** – Sample of California contracts 2024–2025 (Lucasfilm, Snap, Google, ThoughtSpot, SVB, LACCD, Universal, etc.); ongoing operations.

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- **Exhibit 13** – Overby emails show IP ~300km from Copenhagen, not daily commuting distance (4 hours one way); undercutting nerve center and sworn statements.
- **Exhibit 14** – Overby’s e-mail’s sent from an IP address which resolves to Tranbjerg home office, not Copenhagen headquarters; undercutting nerve center and sworn statements.
- **Exhibit 15** – Google Maps confirms Tranbjerg–Copenhagen distance undermining “day-to-day” claim; undercutting nerve center and sworn statements.
- **Exhibit 16** – CEO/CFO/Secretary Balslev’s social media identifies San Francisco as residence
- **Exhibit 17** – Plaintiff litigation hold on DOE defendants since May 2025 (many non-diverse)
- **Exhibit 18** – Rokoko servers hosted in Los Angeles datacenters, not Denmark/Delaware
- **Exhibit 19** – USCIS records confirm Rokoko L-1A visa for CEO/CFO/Secretary transfer to California

- 1 • **Exhibit 20** – DocuSign record: Overby signs California contract from Los Angeles
2 (Dec. 2024)
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- 4 • **Exhibit 21** – DocuSign record: Overby retains Reed Smith LLP on May 7, 2025
5 (same day suit filed)
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- 7 • **Exhibit 22** – DocuSign record: Overby submits “day to day” employment in
8 Copenhagen, signs sworn declaration “executed in Copenhagen”; metadata proves
9 execution in Tranbjerg, not Copenhagen, and rubber-stamped. Demonstrates Counsel
10 authored the declaration, not Defendant.
11
- 12 • **Exhibit 23** – Authentication affidavit from DocuSign.
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15 **II. COURT’S PRIOR STATEMENT ON DIVERSITY JURISDICTION**

16 Plaintiff further requests judicial notice of this Court’s own prior language re: diversity
17 citizenship (Docket #11)
18

19 **[“This is extremely important.** Unlike state courts, federal courts are not courts
20 of general jurisdiction, and can only preside over matters authorized by the Constitution
21 and Congress. *Bender v. Williamsport Area Sch. Dist.*, 475 U.S. 534, 541, 106 S. Ct.
22 1326, 1331, 89 L. Ed. 2d 501 (1986). In other words, the party filing the action must
23 **prove** to the Court that jurisdiction over the action exists **before** the Court can reach the
24 merits of the complaint. *See Smith v. McCullough*, 270 U.S. 456, 459, 46 S. Ct. 338, 339,
25 70 L. Ed. 682 (1926) (A “plaintiff, suing in federal court, must show in his pleading,
26 affirmatively and distinctly, the existence of whatever is essential to federal
27 jurisdiction . . .”).

28 Federal jurisdiction may be alleged either pursuant to 28 U.S.C. section 1331
for actions “arising under the Constitution, laws, or treaties of the United States,” otherwise

1 known as “federal question” jurisdiction, or 28 U.S.C. section 1332 as an action “between
2 citizens of different States,” otherwise known as “diversity” jurisdiction.

3 To allege federal question jurisdiction, the complaint should identify which right(s)
4 the plaintiff(s) claim(s) have been violated, and which law, statute, or constitutional
5 amendment provides that right. *See Keniston v. Roberts*, 717 F.2d 1295, 1298 (9th Cir.
6 1983).

7 Diversity jurisdiction has **two** requirements. First, diversity jurisdiction requires
8 complete diversity of citizenship, that is, all plaintiffs must have a different citizenship
9 from all defendants. *See Owen Equipment & Erection Co. v. Kroger*, 437 U.S. 365, 373,
10 98 S. Ct. 2396, 2402, 57 L. Ed. 2d 274 (1978). Residence and citizenship are distinct
11 concepts, with significantly different jurisdictional ramifications: “[i]n order to be a
12 citizen of a State within the meaning of the diversity statute, a natural person must both be
13 a citizen of the United States and be domiciled within the State.” *Newman-Green, Inc. v.*
14 *Alfonzo-Larrain*, 490 U.S. 826,

15 828, 109 S. Ct. 2218, 2221, 104 L. Ed. 2d 893 (1989). “A person’s
16 domicile is her permanent home, where she resides with the intention to remain or to
17 which she intends to return. A person residing in a given state is not necessarily domiciled
18 there, and thus is not necessarily a citizen of that state.” *Kanter v. Warner-Lambert Co.*,
19 265 F.3d 853, 857 (9th Cir. 2001) (citations omitted). Corporations are citizens of both
20 their state of incorporation and the state in which they have their principal place of
21 business. 28 U.S.C. § 1332(c)(1); *see also New Alaska Dev. Corp. v. Guetschow*, 869 F.2d
22 1298, 1300-01 (9th Cir. 1989). Unincorporated associations are citizens of the states of
23 each member. *See Fifty Associates v. Prudential Ins. Co. of Am.*, 446 F.2d 1187, 1190
24 (9th Cir. 1970). Second, when jurisdiction is based on diversity of citizenship, district
25 courts do not have original jurisdiction unless a party alleges an amount in controversy
26 exceeding \$75,000. 28 U.S.C. § 1332(a).

27 Finally, you should understand that it is **insufficient** for a party to merely claim
28 that jurisdiction exists. Sufficient **facts** must be alleged to allow the Court to assess
whether it has jurisdiction over the action.”]

20 CONCLUSION

21 The above matters are subject to judicial notice under FRE 201(b). They are either:

- 22 • Public records, corporate disclosures, or filings.
- 23 • Social media statements made by the Defendant and controlling officers.
- 24 • Metadata and forensic evidence directly tied to the filings in this action.
- 25 • Judicially noticeable facts regarding geography, contact information, business operations,
26 and domicile.
- 27
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1
2 Plaintiff requests judicial notice solely of the existence and contents of these records, not of any
3 inferences that may be drawn therefrom and requests that the Court grant this judicial notice.
4

5
6 **AUTHENTICATION CERTIFICATION OF ALL EVIDENCE**

7 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California
8 that every document inclusive Exhibit A – Exhibit R is a true and correct copy of a document I
9 personally received, created, or obtained in connection with this case, and it has not been
10 materially altered.
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Executed this 26 day of August, 2025 in Santa Clarita, California.



Matthew R. Walsh

Plaintiff in pro per

EXHIBIT 1 – ROKOKO owns commercial property in San Francisco, CA; tax lien.

Public records show Rokoko Electronics, Inc. owns commercial property at 44 Tehama St., San Francisco and had a 2017 CA property tax lien (resolved). No sale appears after of record.

Relevance: Directly contradicts “never a citizen” claims and establishes a California place of business/domicile. (also see Exhibit 2)

Recording Requested By:
City and County of San Francisco
Treasurer & Tax Collector, BDR

When Recorded Mail To:

ROKOKO ELECTRONICS
44 TEHAMA ST
SAN FRANCISCO CA 94109

20179K55638400001
San Francisco Assessor-Recorder
Carmen Chu, Assessor-Recorder
DOC 2017-K556384-00
Acct 19-San Francisco Tax Collector
Thursday, DEC 21, 2017 16:06:00
Ttl Pd \$0.00 Nbr-0005732939
okc/RE/1-1

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF TREASURER/TAX COLLECTOR

CERTIFICATE OF LIEN FOR UNSECURED PROPERTY TAXES
(Filed pursuant to California Revenue and Taxation Code Section 2191.3, 2191.4)

THIS IS TO NOTIFY YOU THAT A TAX LIEN HAS BEEN FILED WITH RESPECT TO UNSECURED PROPERTY

I, David P. Augustine, Tax Collector of the City and County of San Francisco, State of California, do hereby certify that there is on record in my office unpaid delinquent Unsecured Property taxes, which are duly assessed, computed and levied for the fiscal years shown, in compliance with the provisions of Division 1, Part 5, of the California Revenue and Taxation Code, in the amounts stated herein, together with delinquent penalties and fees levied pursuant to Section 2922 of the California Revenue and Taxation Code.

The person or persons named herein are liable to the City and County of San Francisco for the total unpaid amount as set forth herein:

LOCATION OF PROPERTY	ASSESSMENT NO	FISCAL YEAR
0044 TEHAMA ST	17-401816	2017-2018
OWNER NAME	LIEN AMOUNTS	\$800.86
ROKOKO ELECTRONICS		

Said address being the last known address of the assessee from and after the time of filing of this certificate, the total amount of unpaid tax and penalty required to be paid by each of the persons named constitutes a lien upon all personal and real property now owned by each of said person or persons, respectively, or that may subsequently be acquired by them, or any of them, before the date on which this lien expires.

The lien amount shown includes penalties, interest, collection costs and lien release fee. Additional interest will continue to accrue at the rate of one and one half (11/2) percent per month as prescribed by law. This lien has the force, effect and priority of a judgment for ten (10) years from the time of the recording of this instrument, unless sooner released or otherwise discharged.


David Augustine, Tax Collector
CITY AND COUNTY OF SAN FRANCISCO

Dated: Dec 20, 2017

EXHIBIT 2 – ROKOKO Docusign with SF Treasury RE: Property Taxes in Dec 2024

DocuSign records show Defendant Overby executing documents originating from the San Francisco Treasurer’s Office for payment of property taxes which the entity owes in San Francisco. The audit trail reflects an IP address resolving to Los Angeles, California.

Relevance: These system-generated records directly contradict Defendants’ sworn statements that they ceased California operations in 2020 and that Rokoko has “never been a citizen of California.” (also see Exhibit 1)



Certificate Of Completion

Envelope Id: 4E60099391444EFBA6FBF9CD5BAA6F62	Status: Completed
Subject: DocuSign: Request for Business Tax PIN	
Source Envelope:	
Document Pages: 1	Signatures: 1
Certificate Pages: 4	Initials: 0
AutoNav: Enabled	Envelope Originator:
EnvelopeId Stamping: Enabled	TTX PINREQUEST
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	1 Dr. Carlton B. Goodlett Place City Hall
	Room 140
	San Francisco, CA 94102
	ttx.pinrequest@sfgov.org
	IP Address: 138.199.35.202

Record Tracking

Status: Original	Holder: TTX PINREQUEST	Location: DocuSign
12/2/2024 7:11:18 AM	ttx.pinrequest@sfgov.org	

Signer Events

Mikkel Lucas Overby
mikkel@rokoko.com
Security Level:
DocuSign_email
ID: 1
12/2/2024 7:11:20 AM

Signature

Signed by:

8BC43927ABA54E4...
Signature Adoption: Pre-selected Style
Using IP Address: 138.199.35.202

Timestamp

Sent: 12/2/2024 7:11:19 AM
Viewed: 12/2/2024 7:11:58 AM
Signed: 12/2/2024 7:12:13 AM

Electronic Record and Signature Disclosure:
Accepted: 12/2/2024 7:11:58 AM
ID: e593a051-5878-4f42-9437-5b5d606ace17

Geolocation data from **IP2Location** Product: DB6, 2025-8-1

IP ADDRESS: 138.199.35.213	ISP: DataCamp Limited
COUNTRY: United States	ORGANIZATION: Not available
REGION: California	LATITUDE: 34.0526
CITY: Los Angeles	LONGITUDE: -118.2439

[Incorrect location?](#)
[Contact IP2Location](#)
 [view map](#)

EXHIBIT 3 – ROKOKO Head of Board Resides in San Francisco (noticed DOE Def.)

Defendant’s board member Stefano Corazza (noticed DOE) permanently resides and makes decisions from California.

Relevance: Defeats complete diversity given his intended DOE (noticed) status and high-level decision-making role (identified in the pitch deck/Complaint).



RECORDING REQUESTED BY:
Orange Coast Title Company of Northern California

City and County of San Francisco
Joaquin Torres, Assessor-Recorder

Doc #	2023046876	Fees	\$20.00
6/30/2023	2:41:09 PM	Taxes	\$0.00
KC	Electronic	Other	\$0.00
Pages	3 Title 001	SB2 Fees	\$0.00
Customer	2233	Paid	\$20.00

When Recorded Mail Document To:
Ana Maya Koenig
290 Richland Ave. #292
San Francisco, CA 94110

Escrow No.: 525-SAC-23201462-71 - ST
Title No.: 525-2371038-62

APN: 34-5745-058-01

SPACE ABOVE THIS LINE FOR RECORDER'S USE

INTERSPOUSAL TRANSFER DEED

(Excluded from reappraisal under California Constitution Article 13 A Section 1 et seq.)

The undersigned Grantor(s) declare(s) that the DOCUMENTARY TRANSFER TAX is: EXEMPT *\$0.00*

- This transfer is exempt from the documentary transfer tax.
- "This conveyance establishes sole and separate property of a spouse. R&T 11911"**

- The documentary transfer tax is computed on:
 - the full value of the interest or property conveyed.
 - the full value less the liens or encumbrances remaining thereon at the time of sale.
- The property is located in the City of San Francisco

This is an Interspousal Transfer and not a change in ownership under Section 63 of the Revenue and Taxation Code and Grantor(s) has (have) checked the applicable exclusion from reappraisal.

- One spouse to other

-A creation, transfer, or termination, solely between spouses, of any co-owner's interest.

FOR A VALUE CONSIDERATION, receipt of which is hereby acknowledged,

Stefano Corazza, spouse of the grantee herein

hereby GRANT(s) to

Ana Maya Koenig, a married woman as her sole and separate property

the following described real property:

See Exhibit A attached hereto and made a part hereof.

Commonly known as: 290 Richland Ave. #292, San Francisco, CA 94110

The grantor is executing this instrument for the purpose of relinquishing all of grantor's rights, title and interest, including, but not limited to, any community property interest in and to the land described herein and placing title in the name of the grantee as his/her separate property.

Exempt from fee per GC 27388.1 (a) (2); recorded concurrently in connection with a transfer subject to the imposition of documentary transfer tax (DTT).

MAIL TAX STATEMENTS AS DIRECTED ABOVE
INTERSPOUSAL TRANSFER DEED

EXHIBIT 4 – CEO/CFO/Secretary registered entity to his luxury apartment thru 2024

California SOS records through 2024 list Jakob Balslev (CEO/CFO/Secretary) at his luxury apartment at 4140 Cesar Chavez St., San Francisco, showing residence and executive control concentrated in California (Hertz “nerve center”). Previously filed, un rebutted.

The screenshot shows a web browser window with the URL bizfileonline.sos.ca.gov/search/business. The page title is "History" and it features an "Expand All" button. The history is organized into four distinct amendment records, each with a table of field changes.

Amendment Type	Field Name	Changed From	Changed To
Statement of Information - 7/10/2024			
Statement of Information	Annual Report Due Date	3/31/2024 12:00:00 AM	3/31/2025 12:00:00 AM
Control ID: BA20241277973 Date: 7/10/2024 Download			
Statement of Information - 8/23/2023			
Statement of Information	Annual Report Due Date	3/31/2023 12:00:00 AM	3/31/2024 12:00:00 AM
Statement of Information	CRA Changed	JAKOB BALSLEV 4140 CESAR CHAVEZ STREET SAN FRANCISCO, CA 94131	CORPNET, INCORPORATED 31416 AGOURA RD STE 118 WESTLAKE VILLAGE, CA 91361
Control ID: BA20231321569 Date: 8/23/2023 Download			
System Amendment - SOS Revivor - 6/21/2022			
System Amendment - SOS Revivor	Filing Status	Forfeited - SOS	Active
System Amendment - SOS Revivor	Inactive Date	10/27/2021 12:00:00 AM	None
Control ID: BA20220408168 Date: 6/21/2022			
System Amendment - SOS Forfeited - 10/27/2021			
System Amendment - SOS Forfeited			

© 2025 CA Secretary of State

EXHIBIT 5 – ROKOKO’s Creative Director lives in San Francisco

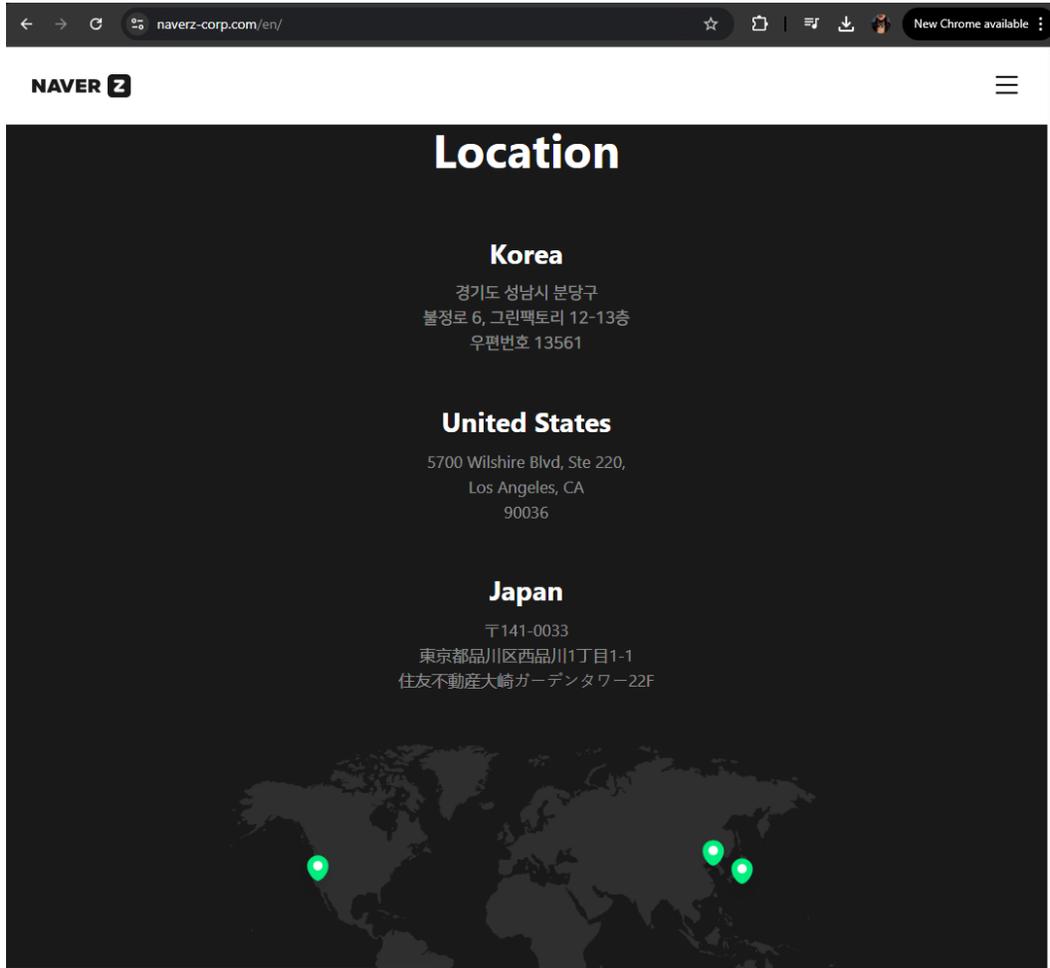
Defendant’s Creative Director Sam Lazarus lives/works in San Francisco (as of 8/26/2025), further supporting that core product decisions—and thus control—occur in California. Further, Docusign records confirm this individual is central to operations as he signs on behalf of the Company. Relevance: Hertz Nerve Center.

The screenshot shows an Instagram profile for 'the.jabberwock' with 479 posts, 5,841 followers, and 845 following. The bio identifies 'sam lazarus' as the creative director of @hellorokoko, former creative director of @gopro, located in San Francisco, CA, with a website link to www.thejabberwock.com. Below the profile is a Docusign electronic signature record for Sam Lazarus, signed on 1/20/2025 at 6:55:43 AM, with a resent on 1/23/2025 at 4:10:34 AM, viewed on 1/23/2025 at 9:52:36 AM, and signed on 1/23/2025 at 9:52:44 AM. The signature adoption is noted as 'Pre-selected Style' using IP address 67.161.30.144. Below the signature record is another electronic record and signature disclosure for 1/23/2025 at 9:52:36 AM with ID 204e8c65-923b-41a6-9ce2-8f3f02a50bd4. At the bottom is a geolocation data section from IP2Location for IP address 67.161.30.144, identifying the location as Fremont, California, with ISP Comcast Cable Communications LLC.

EXHIBIT 6 – Major equity shareholder DOE is Los Angeles, CA based.

Naver Z (a noticed DOE defendant), a major equity holder (~\$93M), is located in California,

Relevance: defeating complete diversity (previously referenced, un rebutted).



Electronic Record and Signature Disclosure:
Accepted: 2/5/2024 12:06:14 AM
ID: 8cb48002-ad23-4916-9892-11fba05cc86d

Chang Kim
dl_naverzcontract@naverz-corp.com
CEO
NAVER Z Limited
Security Level: Email, Account Authentication (None)



Signature Adoption: Uploaded Signature Image
Using IP Address: 211.249.71.131

Sent: 2/2/2024 5:09:31 AM
Resent: 2/5/2024 12:05:24 AM
Resent: 2/6/2024 2:49:01 AM
Resent: 2/6/2024 3:49:13 AM
Viewed: 2/6/2024 3:50:20 AM
Signed: 2/6/2024 3:50:35 AM

Electronic Record and Signature Disclosure:
Accepted: 2/6/2024 3:50:20 AM
ID: 7a50820e-70a1-4b80-b44f-6194cf597992

EXHIBIT 7 - CEO/CFO/Secretary still lists ROKOKO San Francisco as P.O.E.

As of 8/16/2025, Balslev still lists employment at Rokoko San Francisco. Not a generic LinkedIn artifact—other employees show differing locales—supporting California as the nerve center. Previously filed, un rebutted.

The screenshot shows the LinkedIn profile of Jakob Balslev, CEO & Founder of Rokoko. The profile includes the following information:

- Experience:**
 - CEO & Co-founder** at Rokoko (Mar 2014 - Present, 11 yrs 6 mos, San Francisco Bay Area, www.rokoko.com)
 - Global Shaper** at World Economic Forum (Jul 2015 - Jul 2017, 2 yrs 1 mo, https://www.globalshapers.org/)
 - Producer** at Zentropa (Jun 2013 - Mar 2014, 10 mos, http://www.dfi.dk/faktaomfilm/person/en/172673.aspx?id=172673, http://www.imdb.com/name/nm2802638/?ref=fn_al_nm_1)
 - Producer assistant** at Nordisk Film (Aug 2007 - Aug 2009, 2 yrs 1 mo, http://www.imdb.com/name/nm2802638/?ref=fn_al_nm_1)
- Education:**
 - The National Film School of Denmark** (2009 - 2013, Filmproducer, Grade: MA)
 - European Film College** (2006 - 2007)

At the bottom of the profile, there is a link to the company page: <https://www.linkedin.com/company/165212/>

EXHIBIT 8 – Defendant remained hiring into 2022 in California.

Defendant asserted it left CA in 2020 and has only one CA employee, omitting Stef Corazza and Sam Lazarus; yet last was hiring in LA in 2022, contradicting the “one employee” narrative.

The screenshot shows a Glassdoor page for 'Project Manager' salaries at 'Rokoko'. The browser address bar shows 'glassdoor.com/Salary/Rokoko-Project-Manager-Salaries-E1895865_D_KO7.22.htm'. On the left sidebar, there are categories like 'Bowls', 'Job Hunting in Tech', 'Software Engineering', and 'Tech'. The main content area includes a section for 'Get feedback on your pay or offer' with a 'See how it works' button. Below that is a section titled 'Recent salaries shared by Project Manager at Rokoko' with filters for 'Location' and 'All years of experience'. A table shows one salary entry: 'Project Manager | 1-3 years' in 'Los Angeles, CA' with a pay range of '\$33K - \$38K/yr' submitted on 'Jan 14, 2022'. At the bottom, there is a 'Rokoko pay FAQs' section.

EXHIBIT 9 – Defendant shows hiring in San Francisco as of 2025.

Defendant’s live careers page identifies San Francisco as an operational base with active/ongoing/intended hiring.

Relevance: evidence of continuing California operations and further no mention of Delaware.

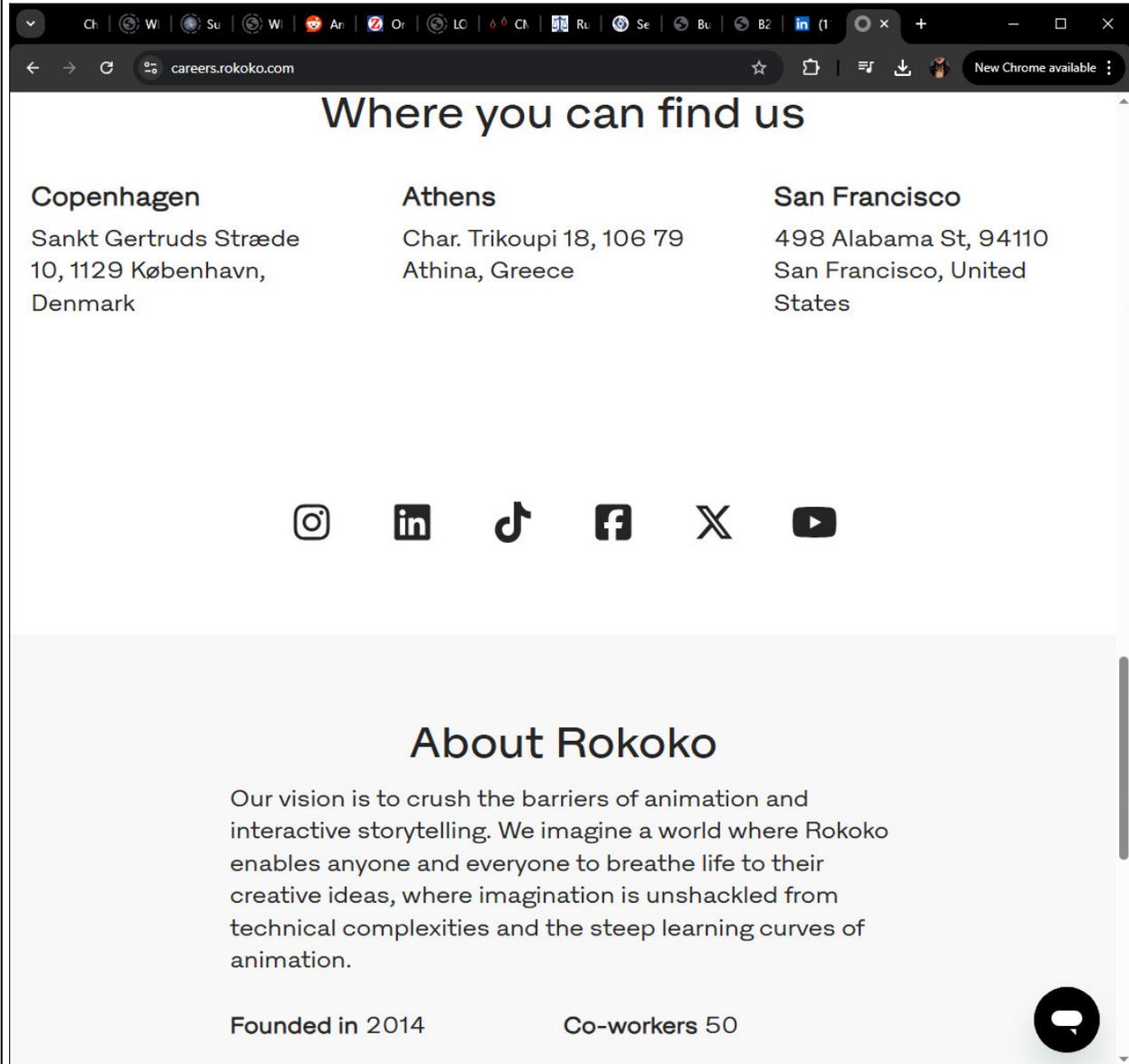
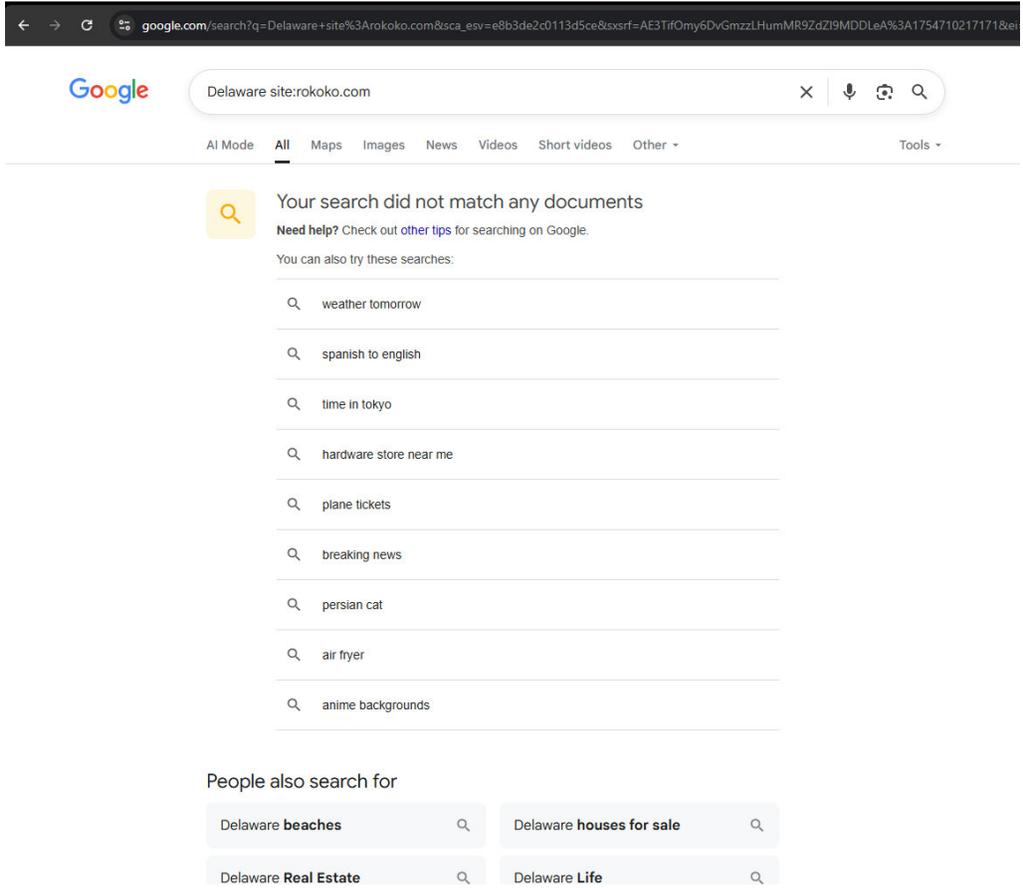


EXHIBIT 10 – Google shows no mention of Delaware on Defendant’s website.

Google search of Defendant’s site (including all 1500+ pages, PDFs, blogs) shows **no mention of Delaware** whatsoever, much less as a place of business.

Relevance: further undermining any Delaware “principal place of business” claim.



Google indexes over 1500 pages from Defendant’s site:

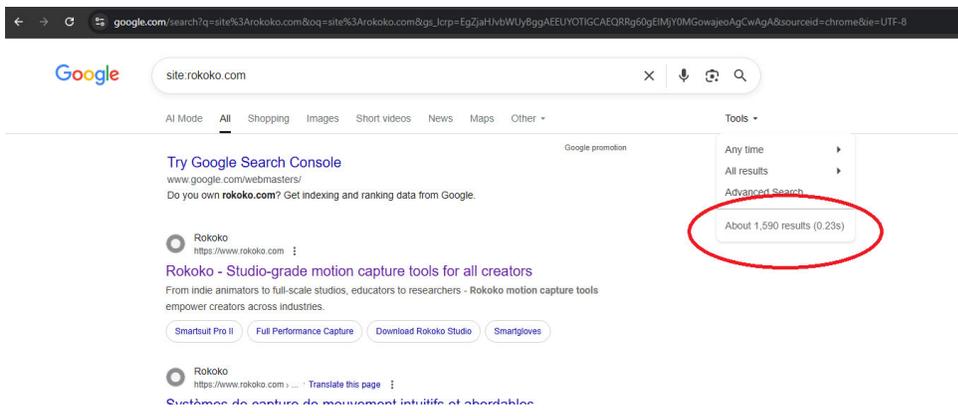


EXHIBIT 11 – Defendant shows only Denmark and San Francisco locations

Defendant’s LinkedIn lists Denmark and San Francisco—no Delaware—for locations.

Relevance: undercutting any assertion of a Delaware nerve center/domicile.

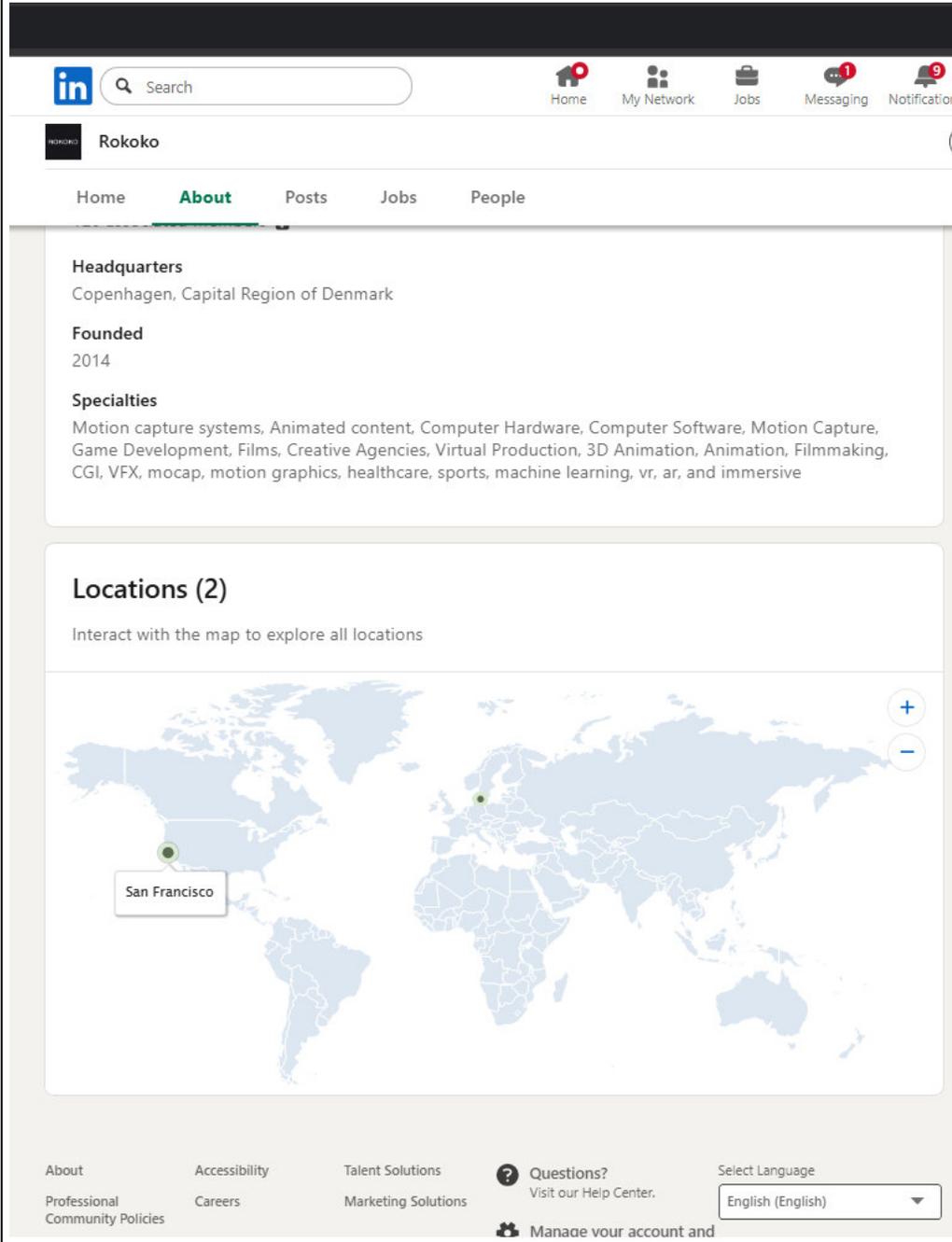


EXHIBIT 12 – Sample list of Defendant’s California contracts 2024-2025

The Court may take judicial notice of several business dealings, contracts, and agreements entered into by Defendant with California companies and institutions since 2024, including Lucasfilm, Snap Inc., Silicon Valley Bank, Google, ThoughtSpot, Los Angeles Community College, and Universal, among others.

Relevance: These records directly undercut Defendants’ sworn statements that their California operations had “tapered down” or ceased after 2020.



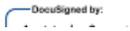
Certificate Of Completion

Envelope Id: 890EB4F4B6D04F438D4E9C3C173487B6	Status: Completed
Subject: Non-Disclosure Agreement (Rokoko Electronics Inc. and Snap)	
Source Envelope:	
Document Pages: 3	Signatures: 2
Certificate Pages: 5	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelope Stamping: Enabled	Snap Agreements
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	63 Market Street
	Venice, CA 90291
	svc-docusignironclad@snap.com
	IP Address: 35.185.192.36

Record Tracking

Status: Original	Holder: Snap Agreements	Location: DocuSign
1/22/2024 3:40:12 PM	svc-docusignironclad@snap.com	

Signer Events

Signature	Timestamp
Mikkel Overby 	Sent: 1/22/2024 3:40:15 PM



Certificate Of Completion

Envelope Id: 2363FF8F649D4914AB19CD983CCC9D64	Status: Completed
Subject: ROKOKO ELECTRONICS, INCORPORATED: ACH Return Request (CAS-5545097-S2L1V8)	
Request Type:	
Product Type / Template:	
Source Envelope:	
Document Pages: 2	Signatures: 1
Certificate Pages: 5	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelope Stamping: Enabled	Brandon Weigel
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	3003 Tasman Dr
	Santa Clara, CA 95054
	brweigel@svb.com
	IP Address: 136.226.67.76

Record Tracking

Status: Original	Holder: Brandon Weigel	Location: DocuSign
4/15/2024 8:10:42 AM	brweigel@svb.com	

Signer Events

Signature	Timestamp
Brandon Weigel Completed	Sent: 4/15/2024 8:21:22 AM



Certificate Of Completion

Envelope Id: C78318D15CD84D0E83263C1E3CABC3B1		Status: Completed
Subject: Google NDA for your electronic acceptance		
Source Envelope:		
Document Pages: 2	Signatures: 0	Envelope Originator:
Certificate Pages: 4	Initials: 0	Google Contracts team
AutoNav: Enabled		1600 Amphitheatre Pkwy
Envelopeld Stamping: Enabled		Mountain View, CA 94043
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		nala-eng-docusign-prod@google.com
		IP Address: 66.102.6.165



Certificate Of Completion

Envelope Id: F8EC55C4-F168-4927-95DF-611495D4398A		Status: Completed
Subject: ThoughtSpot Renewal Order Form (Approved)		
Source Envelope:		
Document Pages: 2	Signatures: 1	Envelope Originator:
Certificate Pages: 5	Initials: 0	Max Lough
AutoNav: Enabled		444 Casto Street
Envelopeld Stamping: Enabled		STE 1000
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		Mountain View, CA 94041
		max.lough@thoughtspot.com
		IP Address: 155.226.129.248



Certificate Of Completion

Envelope Id: 08F7FB78E5AB4A0184FA51F2B27C05C1		Status: Completed
Subject: Complete with DocuSign: ITCO4600002971.pdf		
Source Envelope:		
Document Pages: 20	Signatures: 2	Envelope Originator:
Certificate Pages: 5	Initials: 0	Andrew Amavisca
AutoNav: Enabled		770 Wilshire Blvd
Envelopeld Stamping: Enabled		Los Angeles, CA 90017
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		AMAVISAP@LACCD.EDU
		IP Address: 204.102.252.8



Certificate Of Completion

Envelope Id: 79DAE6AD-85FB-419C-BA34-0DD49C9EDA1F		Status: Completed
Subject: Complete with DocuSign: Lucasfilm (ILM)_Rider to TOS (Rokoko)_v1.docx		
Source Envelope:		
Document Pages: 4	Signatures: 2	Envelope Originator:
Certificate Pages: 5	Initials: 0	Deb Letner
AutoNav: Enabled		500 S Buena Vista St
Envelopeld Stamping: Enabled		Burbank, CA 91521
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		dletner@ilm.com
		IP Address: 208.72.12.4



Certificate Of Completion

Envelope Id: 890EB4F4B6D04F438D4E9C3C173487B6 Status: Completed

Subject: Non-Disclosure Agreement (Rokoko Electronics Inc. and Snap)

Source Envelope:

Document Pages: 3

Signatures: 2

Envelope Originator:

Certificate Pages: 5

Initials: 0

Snap Agreements

AutoNav: Enabled

63 Market Street

Envelope Stamping: Enabled

Venice, CA 90291

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

svc-docusignironclad@snap.com

IP Address: 35.185.192.36

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EXHIBIT 13 – Defendant Overby lives and works ~300km from Copenhagen

Consistent e-mail headers shows Overby sending from his Apple computer with his IP address which resolves ~300 km (~4 hrs) from Copenhagen to his home office internet account. (see also 14, 15).

Relevance: Contradicting his sworn “day-to-day” Copenhagen work claim.

Received: from mail-lf1-f47.google.com ([209.85.167.47]:48584)
 by gator3161.hostgator.com with esmtps (TLS1.2) tls
 TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256
 (Exim 4.98.1)
 (envelope-from <mikkel@rokoko.com>
 id luBwvc-00000003e1Z-3Rh7
 for matthew@winteryear.com;
 Mon, 05 May 2025 09:36:22 -0500

Received: by mail-lf1-f47.google.com with SMTP id 2adb3069b0e04-54d65cb6e8aso5786573e87.1
 for <matthew@winteryear.com>; Mon, 05 May 2025 07:36:15 -0700 (PDT)

Received: from smtpclient.apple ([87.48.131.206])
 by smtp.gmail.com with ESMTPSA id 2adb3069b0e04-
 54ea94ee377sm1703494e87.155.2025.05.05.07.36.03
 (version=TLS1_2 cipher=ECDHE-ECDSA-AES128-GCM-SHA256 bits=128/128);
 Mon, 05 May 2025 07:36:04 -0700 (PDT)

Received: from gator3161.hostgator.com
 by gator3161.hostgator.com with LMTP
 id sBZGEebMGGgTdgkANiI7Wg
 (envelope-from <mikkel@rokoko.com>
 for <matthew@winteryear.com>; Mon, 05 May 2025 09:36:22 -0500

From: "Mikkel Lucas Overby" <mikkel@rokoko.com>
 To: <matthew@winteryear.com>
 References: <144601dbbd7b5bd3696a0537a3c3e05@winteryear.com>
 In-Reply-To: <144601dbbd7b5bd3696a0537a3c3e05@winteryear.com>
 Subject: Re: Case dismissed, new case filed.
 Date: Mon, 5 May 2025 07:35:52 -0700
 Message-ID: <CCFBA9DB-AED1-4743-A7A6-0B3D9E94D715@rokoko.com>
 MIME-Version: 1.0
 Content-Type: multipart/mixed;
 boundary="-----_NextPart_000_0D7E_01DBBEE1.AF0AC800"

X-Mailer: Apple Mail (2.3826.200.121)
 Thread-Index: AQQUOKLTESYqtKTrWT+Fc+NUKK5DAhtA2T5
 X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
 d=1e100.net; s=20230601; t=1746455768; x=1747060568;
 h=references:to:in-reply-to:subject:date:mime-version:message-id:from
 :x-gm-message-state:from:to:cc:subject:date:message-id:reply-to;
 bh=r/lgEntD5pJT31+aS1MkXsdFZQ0a4PiZi1Lz5uUocY0=;
 b=A2tvG8G0ZPCE94muXvqQpsfDwvVZakjy9fV12kgKWZ5Y3wKsERS+nCkaqX8ARPORNv
 718wNkbHZYxqmev12ZECx1/7Ey3y5MUpDcLz1R9Mz+2uLgbliu4ti8twlgun1KF6Ledo
 VyaA9DyATNopf6XzBTjPgfLCWpWdVxd9FzmyD+LKNIquHmrhbcP2sthUVgt8ZWYEYPv
 WD0lnV+m8Maam+6j/g5Vz1IqD0+eNod3vwfOajPiZvBrDAFu8uN22oYBc58GTsbChZpI
 8E+AHImc8kGAbQNSXeYEsT6S2dJAYDw2J7aP9R5w6o8vI9Q/DR08hx0SIgR+tm7TI/11
 aN2A==

X-Gm-Message-State: AOJu0YwElQeYy69Y2YPcJdiGYukSUVN14EBeB5rTkftUpnBW8fQH7Qcd
 Un9m2247WLGiq5d2tw1rEZbFnHcZAXnb0YXJLGYcXR1NU5dQAaQ6Jrti5hHbOAqpxPwnwM9jWjK
 DwPd1Ug==

X-Google-Smtp-Source: AGHT+IHV0A2S7+kDzPQXXO+Qt7nQCUSY/z/jkMNYJKuQ2G6blYxm6p8bB3KYKZ8j5RQ5fhnyz249Q==
 X-Received: by 2002:a05:6512:318a:b0:54b:117b:dc9d with SMTP id 2adb3069b0e04-
 54eb2479520mr1968579e87.55.1746455765256;
 Mon, 05 May 2025 07:36:05 -0700 (PDT)

X-Gm-Gg: ASbGnctS8FFinkvy01lX7zAVtM8YCoL5TzSjjs1gz8FRERNA0G9VjJTr1LFx9qC/2A
 2e41mAk1qikCdh5UNDxYRjZzDw8w/K2gopIVbat88LQWSEk7+5M+9VMypZWktGbyH3WXQ4FXur
 ZYuM3FHJHjxKyO/mc9Sv//AGyK0Hiup/L1Fff5xyYTeA9IDLy5fUg/RZPFQE+RiqrpczjgjuU8Z
 sdlenzo7ZcvhkU13HH6131GwYp1S/0bNb/4FiBV3XBxU2gZ7DxT3bpBpQ4Skyoe64Gj7n4Ek2j6
 zGxTkPdwOw/rLLXRMFj1NhfPVzOocaF0oZBxS+zF+lpHZtySplrv8Q==

EXHIBIT 14 – Defendant Overby’s IP address traces

Overby’s emails resolve to a TDC home business account in Midtjylland, within the city of Tranbjerg (tip of a peninsula, across two islands) ~300 km away—[~8-hour daily commute]—

Relevance: undercutting “day-to-day” Copenhagen operations (see also 13, 15).

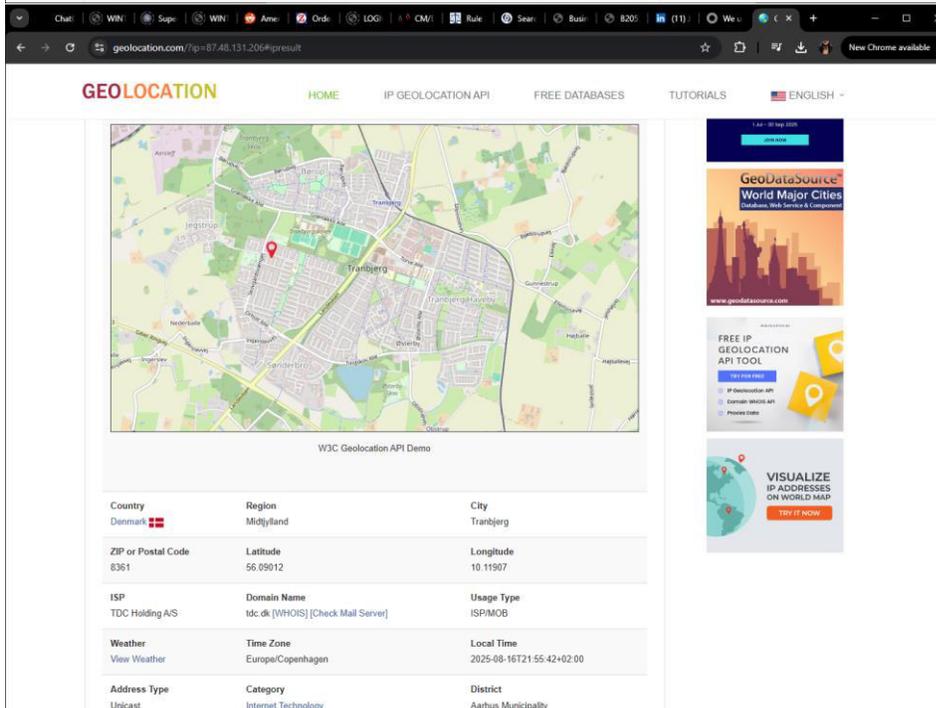
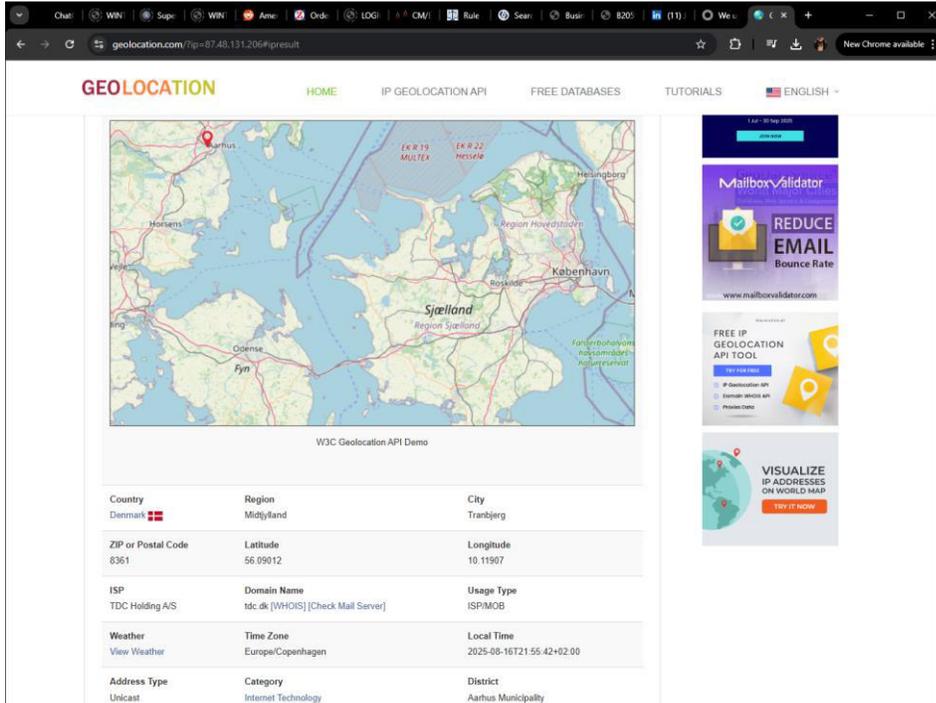


EXHIBIT 15 – Google maps from Overby’s home to “HQ”

Google Maps confirms ~4 hrs / 300 km (or ~3 hrs by car transport ferry) from Overby’s IP location to Copenhagen office, further contradicting his “day-to-day” claim (see also 13, 14).

Relevance: undercutting “day-to-day” Copenhagen operations

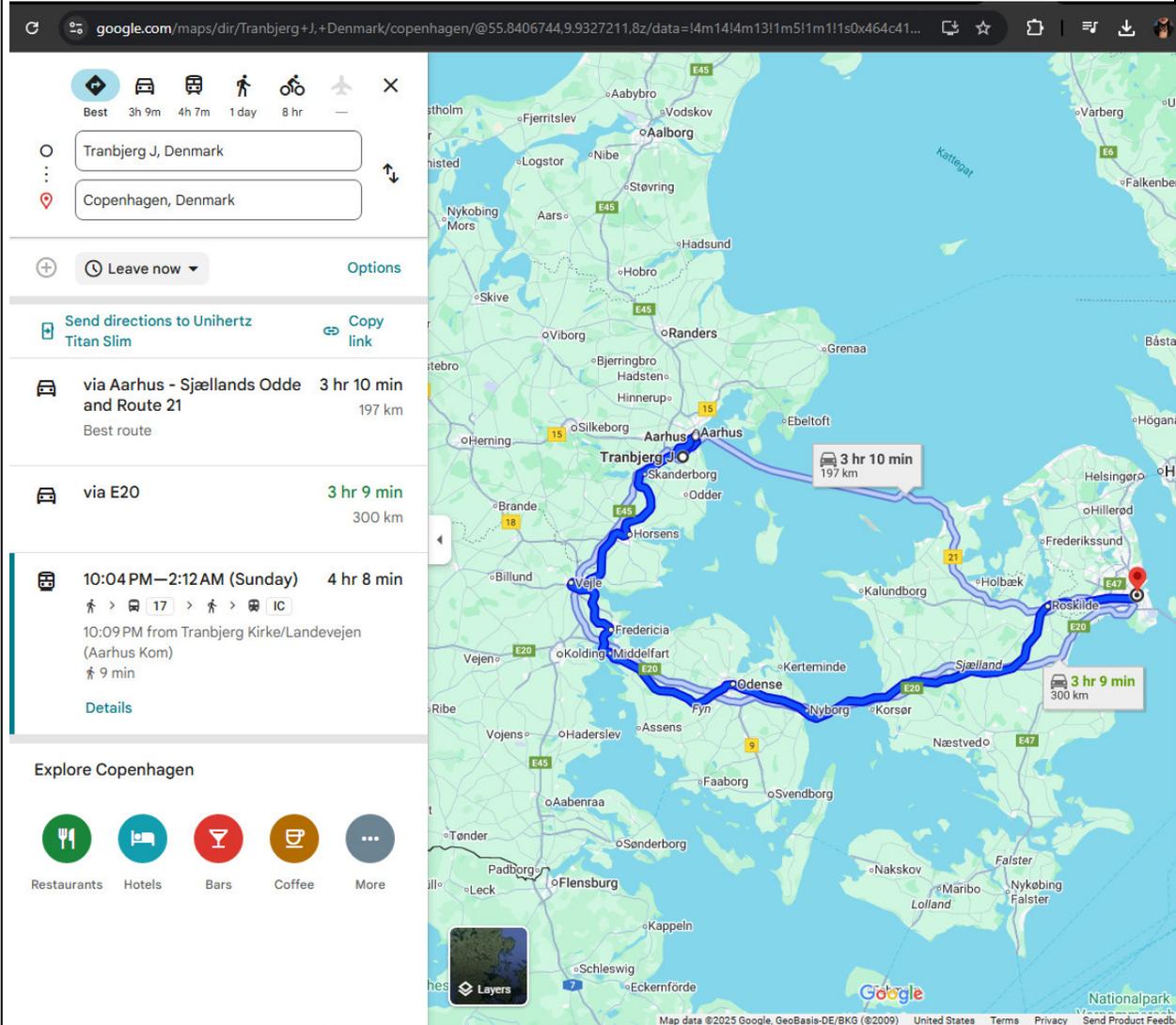


EXHIBIT 16 – The CEO/CFO/Secretary’s Facebook states San Francisco is home.

Social media as of 8/16/2025 shows Balslev’s residence as San Francisco, aligning with other records. Previously filed, un rebutted.

Relevance: Supporting California as the nerve center (Hertz) with his own words.

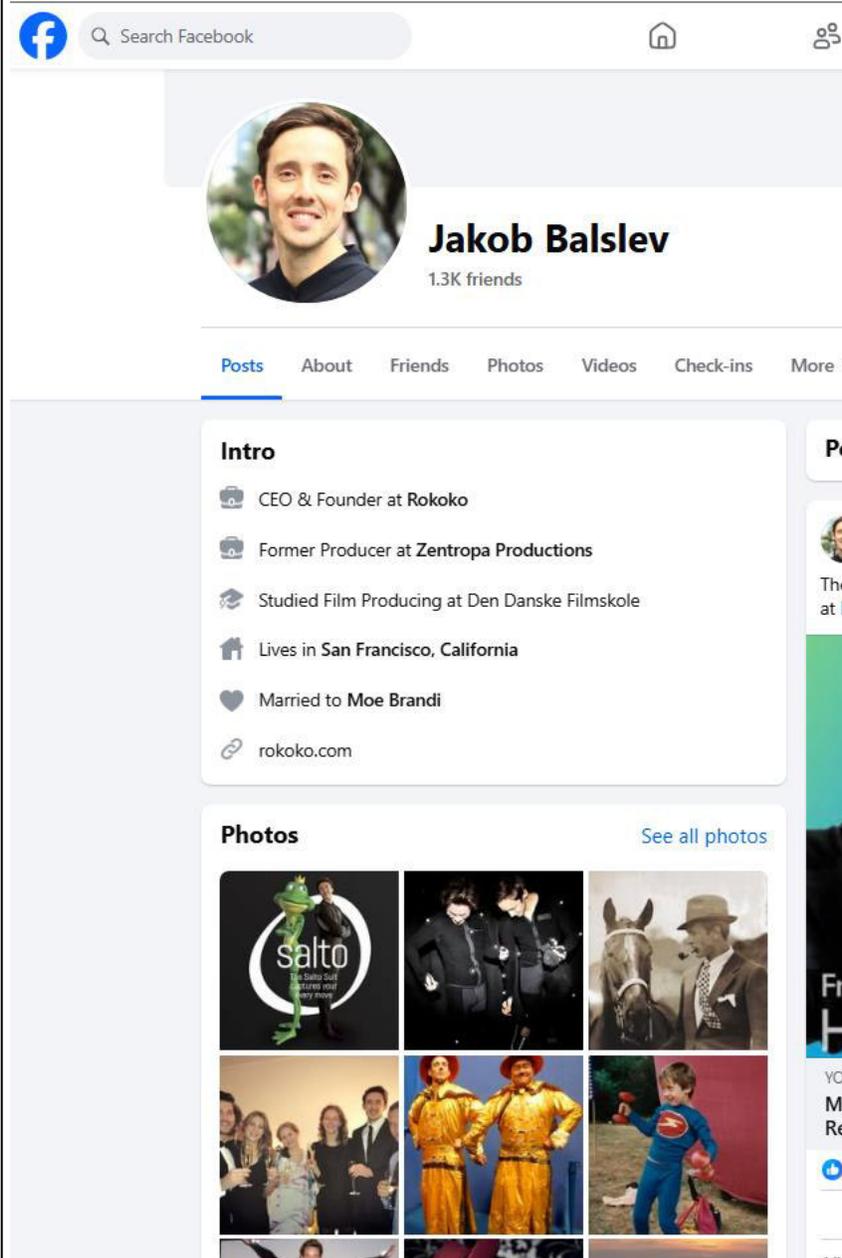


EXHIBIT 17 – List of DOES on Litigation hold

Plaintiff placed DOES on litigation hold as far back as 5/14/2025, signaling forthcoming naming/amendment many non-diverse.

Relevance: further impacting complete diversity.

!		'lyngby@itk.dk'	LITIGATION HOLD NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'gentofte@gentofte.dk'	LITIGATION HOLD NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'lyngby@itk.dk'	FW: LITIGATION HOLD NOTICE: Walsh v Rokoko (also Coco/Rokok... Wed 5/21/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'info@borger.dk'; 'post@borger.dk'	LITIGATION HOLD NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'post@haderslev.dk'	LITIGATION HOLD NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
		'mikkel@cococare.io' Matthew R. Walsh Plaintiff in pro per (661) 644-0012 <end>	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/21/2... 9 KB
		'Roblox Support' LITIGATION HOLD	RE: Roblox Support Ticket 120441610 Thu 5/15/2... 33 KB NOTICE: Walsh v Rokoko (Case No. 25STCV13828) - Los Angeles Superior Court This is for Steven Corazza,
		ZEPETO As your company is a Rokoko investor, it shares in the risk in addition to the reward. There is active litigation possibly	Re: [ZEPETO] 답장: LITIGATION HOLD NOTICE: Walsh v Rokoko (Cas... Wed 5/14/2... 13 KB
!		'brettbibby@mac.com'; 'brettb@unity3d...	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 19 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'thomas@vistiumlimited.com'; 'legal@vis...	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 18 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'info@nev.nu'	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 16 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'Ashley_Mccormack@vfc.com'	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'legal@naverz-corp.com'; 'info@naverz-...	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 17 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not
!		'legal@trifork.com'; 'info@trifork.com'; ...	LITIGATION HOLD NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 22 KB I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not

EXHIBIT 19 – Defendant L-1A Visa to transfer CEO/CFO/Secretary from EU to CA

USCIS records confirm Rokoko Electronics Inc. approved as an L-1A petitioning employer in 2016. L-1A applies only when a U.S. company places an executive/manager in the U.S. to direct, control, and coordinate operations at an existing or newly established U.S. office

Relevance: Shows shift of nerve-center functions to California and downstream establishment of core company operations which remain today.

U.S. Citizenship and Immigration Services
Approved L1 Petitions by Employer
Fiscal Year 2016

Source: USCIS. Data as of Aug. 15, 2017. Notes: All data are based on approved petitions during the fiscal year. Per USCIS best practices, units of less than 10 are aggregated so as to limit the possibility of the de-anonymization of data. "D" represents data withheld to protect privacy. "Employer Industry" is based on the employer NAICS code, not job code. Some employer industry information is missing from our data system and thus left blank. Employers without tax identification numbers in our system were excluded. While some company names may appear multiple times, USCIS enters data as listed on the petition and does not combine companies, even where the names are the same, because in all cases the employer tax identification numbers are different on the petition.

EMPLOYER TAX ID (Last 4 Digits)	EMPLOYER NAME	EMPLOYER INDUSTRY	TOTAL APPROVED PETITIONS	EMPLOYMENT TYPE	CLASS PREFERENCE	APPROVED PETITIONS BY CLASS PREFERENCE
2589	XIBEI RESTAURANT SEATTLE CO LTD			D Initial	L1A	D
2641	SPATALEST INC			D Initial	L1A	D
3111	ROKOKO ELECTRONICS INC			D Initial	L1A	D
3112	WITTON USA INC			D Continuing	L1A	D
3185	GLOBYZ PHARMA LLC			D Initial	L1A	D
3947	JUMMER USA TECHNOLOGY LLC			D Initial	L1A	D
5537	UNITED PACIFIC GRP			D Continuing	L1A	D
6339	AEROSEN PHARMA CORP			D Continuing	L1A	D
6592	MELCANOO USA INC			D Initial	L1B	D
6834	ORHAM HOUSE PROPERTIES MGT INC			D Continuing	L1A	D
6955	CLASSING AMERICA INC			D Initial	L1A	D
7081	ALPHA FASHION USA INC			D Initial	L1A	D
7141	DF RUCCI BEESDING USA INC			D Initial	L1A	D
7236	AUTO CYCLONE LLC			D Initial	L1A	D
7854	ALT CONSULTING GROUP INC			D Initial	L1A	D
7994	JAN PHUOC USA INC			D Initial	L1A	D
8609	TRAVISA			D Initial	L1A	D
9099	PHIL GROUP INVESTMENTS LLC			D Initial	L1A	D
9171	AMERICA LUANTE INC			D Continuing	L1A	D
0811	STREETCHIRROS INC			D Initial	L1A	D
0115	SH KALBRE EQUIPMENT LTD			D Initial	L1A	D
0708	BW LED LIGHTING LLC			D Initial	L1A	D
1860	VERSO LEARNING INC			D Initial	L1B	D
2001	INCOMPATIBLES INC			D Initial	L1A	D
2171	ARTE BUNKERING LLC			D Initial	L1A	D
3781	BETTER AND ENJOY REAL ESTATE INVES			D Initial	L1A	D
3961	INTERROLL USA INC			D Initial	L1A	D
4075	WESTLAND AUTO CENTER LLC			D Initial	L1A	D
4508	VERDE CORPORATION			D Initial	L1A	D

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- [Tools](#)

[Home](#) > [Working in the United States](#) > [Temporary Workers](#) > L-1A Intracompany Transferee Executive or Manager

Working in the United States

International Entrepreneur Rule

Temporary Workers

CW-1: CNMI-Only Transitional Worker

E-1 Treaty Traders

E-2 CNMI Investor

E-2 Treaty Investors

F-3 Certain Specialty

L-1A Intracompany Transferee Executive or Manager

The L-1A nonimmigrant classification enables a U.S. employer to transfer an executive or manager from one of its affiliated foreign offices to one of its offices in the United States. This classification also enables a foreign company that does not yet have an affiliated U.S. office to send an executive or manager to the United States with the purpose of establishing one. The employer must file a [Form I-129, Petition for a Nonimmigrant Worker](#), with fee, on behalf of the employee.

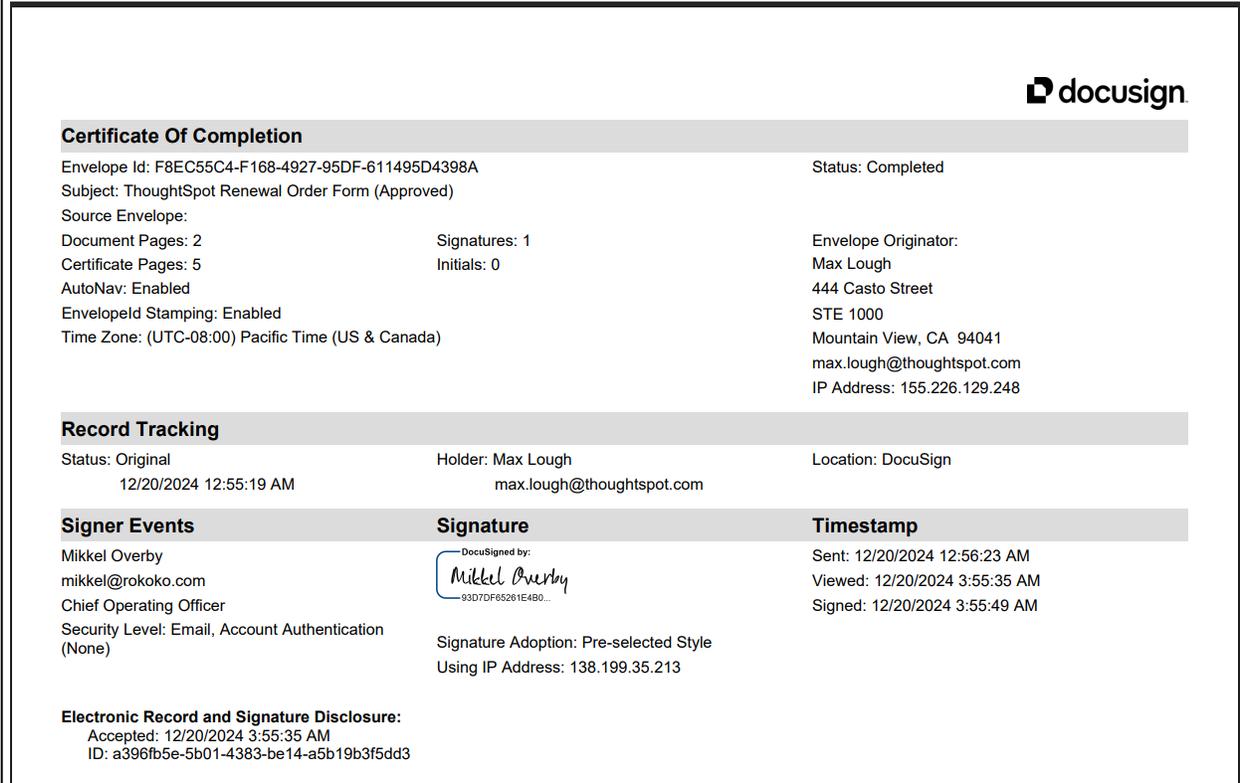
The following information describes some of the features and requirements of the L-1 nonimmigrant visa program.

[Close All](#) [Open All](#)

EXHIBIT 20 – Defendant Overby signed a California contract from Los Angeles

DocuSign Execution Record (Overby, Dec. 20, 2024) The Court may take judicial notice that Exhibit T is a DocuSign execution record showing Defendant Overby signing a contract **from an IP address which resolves to Los Angeles, California** on December 20, 2024.

Relevance: undercutting Defendant Overby’s sworn statements to this Court.



docuSign

Certificate Of Completion

Envelope Id: F8EC55C4-F168-4927-95DF-611495D4398A Status: Completed
 Subject: ThoughtSpot Renewal Order Form (Approved)
 Source Envelope:
 Document Pages: 2 Signatures: 1 Envelope Originator:
 Certificate Pages: 5 Initials: 0 Max Lough
 AutoNav: Enabled 444 Casto Street
 EnvelopeId Stamping: Enabled STE 1000
 Time Zone: (UTC-08:00) Pacific Time (US & Canada) Mountain View, CA 94041
 max.lough@thoughtspot.com
 IP Address: 155.226.129.248

Record Tracking

Status: Original Holder: Max Lough Location: DocuSign
 12/20/2024 12:55:19 AM max.lough@thoughtspot.com

Signer Events	Signature	Timestamp
Mikkel Overby mikkel@rokoko.com Chief Operating Officer Security Level: Email, Account Authentication (None)	 <small>DocuSigned by: Mikkel Overby 93D7DF65261E480...</small> Signature Adoption: Pre-selected Style Using IP Address: 138.199.35.213	Sent: 12/20/2024 12:56:23 AM Viewed: 12/20/2024 3:55:35 AM Signed: 12/20/2024 3:55:49 AM

Electronic Record and Signature Disclosure:
 Accepted: 12/20/2024 3:55:35 AM
 ID: a396fb5e-5b01-4383-be14-a5b19b3f5dd3

Geolocation data from IPRegistry.co Product: API, real-time

 IP ADDRESS: 138.199.35.213	 ISP: Datacamp Limited
 COUNTRY: United States 	 ORGANIZATION: CDNEXT-LAX
 REGION: California	 LATITUDE: 34.05369
 CITY: Los Angeles	 LONGITUDE: -118.24276

EXHIBIT 21 – Defendant retained Counsel same-day as the action was filed.

The Court may take judicial notice that Exhibit 21 is a DocuSign execution record showing Defendant Overby signing an engagement letter with Reed Smith LLP on May 7, 2025 — the same day this action was filed. This record confirms that Defendants retained Reed Smith at the outset of this litigation.

Relevance: directly rebuts any assertion that Reed Smith was engaged only at the “last minute”, that Counsel had “no time” to answer in State or Federal or that Defendants’ procedural missteps or untimeliness resulted from lack of counsel.



Certificate Of Completion

Envelope Id: C46FB982-51E2-4570-A03A-B592C1067C02		Status: Completed
Subject: Complete with DocuSign: Engagement Letter - Rokoko Electronics Aps.pdf		
CLIENT MATTER INFO: 0		
Source Envelope:		
Document Pages: 9	Signatures: 1	Envelope Originator:
Certificate Pages: 4	Initials: 0	Ann Vet
AutoNav: Enabled		225 5th Ave.
Envelope Stamping: Enabled		Pittsburgh, PA 15222
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		avet@reedsmith.com
		IP Address: 10.104.81.9

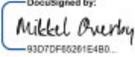
Record Tracking

Status: Original	Holder: Ann Vet	Location: DocuSign
5/7/2025 7:44:00 AM	avet@reedsmith.com	

Signer Events

Mikkel Overby
mikkel@rokoko.com
Chief Operating Officer
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:

93D7DF60261E4B0...
Signature Adoption: Pre-selected Style
Using IP Address: 77.241.129.25

Timestamp

Sent: 5/7/2025 7:48:03 AM
Viewed: 5/7/2025 11:13:15 PM
Signed: 5/8/2025 1:01:31 AM

Electronic Record and Signature Disclosure:

Accepted: 5/7/2025 11:13:15 PM
ID: 299d8d9a-3db0-44e3-af96-51a876338678
Company Name: Reed Smith LLP

EXHIBIT 22 – Defendant falsely claimed declaration signature Executed in Copenhagen.

The Court may take judicial notice that Exhibit 22 is a DocuSign execution record showing Defendant Overby signing a sworn declaration which states that he works “day to day” in Copenhagen and that the declaration was executed in Copenhagen, Denmark. DocuSign metadata shows the signature was executed instead from Tranbjerg, Midjylland — approximately 300 km (4 hours) away — where Overby in fact resides and works.

The metadata further confirms that the declaration was transmitted *to* Defendant *from* counsel and signed within 90 seconds of receipt, demonstrating that the declaration was drafted by counsel and merely rubber-stamped by Overby, not authored by him under penalty of perjury.

Relevance: Contradicts the sworn statement as to place of execution and work location, and supports a broader pattern of knowingly false declarations made by Defendant and Counsel.

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.

Executed this 28th day of July, 2025, in Copenhagen, Denmark.

DocuSigned by:
Mikkel Overby
93D7DF65261E4B0...
Mikkel Overby



Certificate Of Completion

Envelope Id: 731C2183-C8A8-4B97-91B2-5D2D3EA4325E Status: Completed
Subject: Complete with DocuSign: Rokoko - Declaration of Mikkel Overby iso Opp. to MTS Removal(207271599...
CLIENT MATTER INFO: Walsh/Rokoko
Source Envelope:
Document Pages: 3 Signatures: 1 Envelope Originator:
Certificate Pages: 4 Initials: 0 Katherine Ellena
AutoNav: Enabled 225 5th Ave.
Envelopelid Stamping: Enabled Pittsburgh, PA 15222
Time Zone: (UTC) Dublin, Edinburgh, Lisbon, London kellena@reedsmith.com
IP Address: 155.254.204.10

Record Tracking

Status: Original Holder: Katherine Ellena Location: DocuSign
7/28/2025 6:06:04 PM kellena@reedsmith.com

Signer Events

Mikkel Overby
mikkel@rokoko.com
Chief Operating Officer
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:
Mikkel Overby
93D7DF65261E4B0...
Signature Adoption: Pre-selected Style
Using IP Address: 80.208.76.123

Timestamp

Sent: 7/28/2025 6:07:10 PM
Viewed: 7/28/2025 6:56:37 PM
Signed: 7/28/2025 6:58:07 PM

Electronic Record and Signature Disclosure:

Accepted: 7/28/2025 6:56:37 PM
ID: fe9fa1a8-70e2-43f3-b1a1-c702a16db96e
Company Name: Reed Smith LLP

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Geolocation data from		IP2Location	Product: DB6, 2025-8-1
 IP ADDRESS: 80.208.76.123	 ISP: Fibia P/S		
 COUNTRY: Denmark 	 ORGANIZATION: Not available		
 REGION: Midtjylland	 LATITUDE: 56.0901		
 CITY: Tranbjerg	 LONGITUDE: 10.1191		
Incorrect location?	Contact IP2Location	 view map	

Exhibit 22 – Custodian affidavit Re: Docusign evidence.

The Court may take Judicial notice of this affidavit from Docusign authenticating the evidence within this RJN. Under FRE 803(6), the evidence is admissible and is self-authenticating under FRE 902(11). As Docusign is a worldwide trusted resource used even by Governments; and that Plaintiff is utilizing only the metadata/IP address locations and times, that information is not subject to dispute. The evidence is admissible under Rule 201.

DocuSign Envelope ID: AAC135DC-8406-4064-A117-0636F1F2B0A2

DECLARATION OF LAURA LEMASTER

I, Laura LeMaster, declare as follows:

1. I am over the age of 18 years and make this declaration based on my own personal knowledge. If called upon to do so, I could and would competently testify under oath to the matters set forth herein.

2. I am the Director of Investigations for DocuSign, Inc. (“DocuSign”), which operates a system by which persons and entities can electronically sign documents. I have been employed by DocuSign since January 2018, and in that capacity, I have personal knowledge of the DocuSign System described below.

3. I am authorized to submit this declaration on behalf of DocuSign and in response to a Subpoena for Production of Documents dated August 6, 2025 and issued in the matter Matthew R. Walsh vs. Rokoko Electronics.

4. DocuSign produced true and correct copies of records pertaining to all identifiers provided and responsive to this request, including the following records:
Audit Trails associated with user email addresses jakob@rokoko.com, matias@rokoko.com, and mikkel@rokoko.com

5. DocuSign’s servers record this data automatically at the time, or reasonably soon after, it was entered or transmitted, and this data is kept in the course of this regularly conducted activity and was made by a regularly conducted activity as a regular practice.

6. DocuSign is unable to produce copies of the contents of the envelopes associated with these transactions. The content of such records is encrypted on DocuSign’s systems and therefore only available to the parties to the transaction.

7. In addition, DocuSign cannot access and is therefore unable to produce copies of unredacted envelope histories due to a policy-driven code set. As such, envelope histories produced contain redaction of the titles of documents assigned by the user.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2025, in Seattle, Washington.

DocuSigned by:
Laura LeMaster
SE42F1C1FFC872A
Laura LeMaster