

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
8 **CENTRAL DISTRICT OF CALIFORNIA**

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

12 Plaintiff In Pro Per,

13 vs.

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

19 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

**DECLARATION OF MATTHEW R.
WALSH
ISO MOTION FOR SANCTIONS
RE: EVIDENTIARY PACKAGE**

20
21 **DECLARATION OF MATTHEW R. WALSH**
22 **ISO MOTION FOR SANCTIONS RE: EVIDENTIARY PACKAGE**
23

24 I, Matthew R. Walsh, declare as follows:

25 I am the Plaintiff in this action. I have personal knowledge of the facts set forth
26 herein and, if called as a witness, could and would testify competently thereto. All
27

1 exhibits attached hereto are true and accurate copies of documents I have received
2 or made.
3

4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct.
6

7 Executed on September, 15 2025, in Santa Clarita, California.
8

9 

10 Matthew R. Walsh

11 Plaintiff in pro per
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16
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22
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25
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3
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20
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23
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28

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3
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15
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18
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22
- 23 • **EXHIBIT 19** – Mikkel Overby’s second statement.
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- 25 • **EXHIBIT 20** – Overby admitting Rokoko Care changed name to avoid
26 confusion, contradicting Counsel’s Court statements.
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- **EXHIBIT 21** – Notices to Counsel via filings, emails, and 7-3 conference that sanctions would be forthcoming.
- **EXHIBIT 22** – Evidence of Rokoko’s longstanding relationship with Corridor Digital before Corridor podcast echoed Defendant’s accusations.

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EXHIBIT 1

From May 7, 2025 (the day Defendant hired ReedSmtih); Defendant made permanent, public statements on Wikipedia which accuse Plaintiff of “Defamation”, “false statements”, “false information”, “false accusations” and further wished to cast doubt on the actual existence of the case by referring to it as a “supposed lawsuit”.

- (cur | prev) 19:29, 3 September 2025 Sharleenbrando123 (talk | contribs) . . (3,745 bytes) (-1,474) . . (Undid revision 1309237140 by 172.115.94.32 (talk)) (undo) (Tags: Undo, Reverted, section blanking)
- (cur | prev) 22:45, 2 September 2025 172.115.94.32 (talk) . . (5,219 bytes) (+1,474) . . (Undid revision 1302422369 by 2A02:AA7:411B:AFD6:F406:EB5B:122D:9DDF (talk)) (undo) (Tags: Undo, Reverted)
- (cur | prev) 08:54, 25 July 2025 2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf (talk) . . (3,745 bytes) (-1,474) . . (Removed section on 'Legal Issues' as it pertains to an ongoing court case and was added by the plaintiff as defamation.) (undo) (Tags: Reverted, section blanking)
- (cur | prev) 00:40, 24 July 2025 BattyBot (talk | contribs) . . (5,219 bytes) (+12) . . (Fixed reference date error(s) (see CS1 errors: dates for details) and AWB general fixes) (undo) (Tag: AWB)
- (cur | prev) 19:04, 23 July 2025 172.115.94.32 (talk) . . (5,207 bytes) (0) . . (undo)
- (cur | prev) 19:03, 23 July 2025 172.115.94.32 (talk) . . (5,207 bytes) (+46) . . (→Legal Issues) (undo)
- (cur | prev) 19:02, 23 July 2025 172.115.94.32 (talk) . . (5,161 bytes) (+56) . . (undo)
- (cur | prev) 18:59, 23 July 2025 172.115.94.32 (talk) . . (5,105 bytes) (+1,373) . . (undo) (Tag: Disambiguation links added)
- (cur | prev) 04:51, 6 July 2025 AnomieBOT (talk | contribs) m . . (3,732 bytes) (+15) . . (Dating maintenance tags: {{Cn}}) (undo)
- (cur | prev) 04:31, 6 July 2025 Kuru (talk | contribs) . . (3,717 bytes) (-237) . . (rmv non-WP:RS : vanity press; paid placement site) (undo)
- (cur | prev) 07:41, 13 May 2025 Sharleenbrando123 (talk | contribs) m . . (3,954 bytes) (-810) . . (False information regarding an unsettled legal dispute removed.) (undo) (Tag: section blanking)
- (cur | prev) 07:39, 13 May 2025 Sharleenbrando123 (talk | contribs) m . . (4,764 bytes) (-499) . . (→Legal Issues) (undo) (Tag: references removed)
- (cur | prev) 13:46, 7 May 2025 FarmerUpbeat (talk | contribs) m . . (5,263 bytes) (+1,301) . . (Reverted edit by 2A02:AA7:4046:2D91:1CE9:EFF5:4232:A710 (talk) to last version by 172.115.94.32) (undo) (Tag: Rollback)
- (cur | prev) 13:45, 7 May 2025 2a02:aa7:4046:2d91:1ce9:eff5:4232:a710 (talk) . . (3,962 bytes) (-1,301) . . (False accusations about legal violations and supposed lawsuits removed.) (undo) (Tags: Reverted, references removed)
- (cur | prev) 19:50, 26 April 2025 172.115.94.32 (talk) . . (5,263 bytes) (+501) . . (added a section to legal troubles.) (undo)

Defendant did this while also telling the Court that Plaintiff was running a “harassment campaign” against them, which is clearly the opposite. (Dkt #15, p.4, s.II)

II. STATEMENT OF RELEVANT FACTS

Defendant is an international brand of consumer motion capture and animation technology products. This lawsuit was filed by Matthew R. Walsh (“Plaintiff”) and is just the latest event in a long-standing harassment campaign against Defendant. The Complaint was filed May 12, 2025 in the Superior Court of California, County of Los Angeles. See Dkt. 3. The Complaint is 256 pages long including exhibits, 80 pages without, and has fourteen causes of action including fraudulent

1 One of the IP addresses in question (“2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf”)

2 resolve to their “HQ” office.

3 **GEOLOCATION** HOME IP GEOLOCATION API FREE DATABASES



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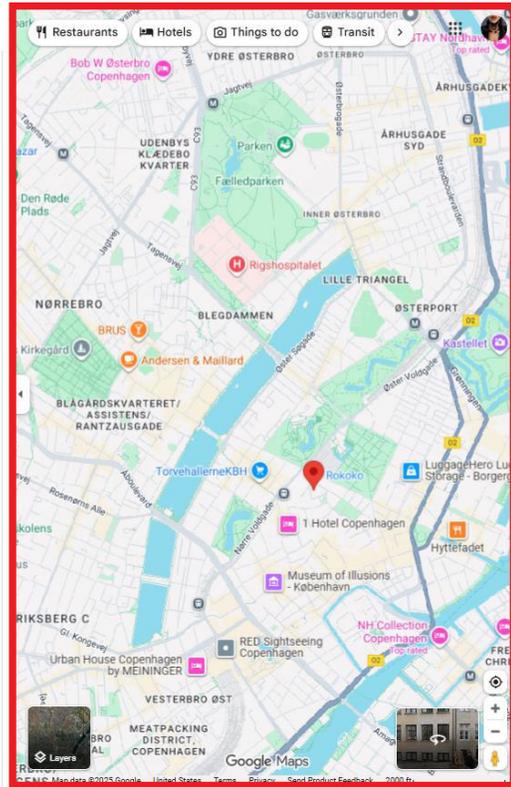
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Country	Region	City
Denmark 🇩🇰	Hovedstaden	Copenhagen
ZIP or Postal Code	Latitude	Longitude
2450	55.67594	12.56553
ISP	Domain Name	Usage Type
Hi3G Access AB	hi3gaccess.se [WHOIS] [Check Mail Server]	MOB
Weather	Time Zone	Local Time
View Weather	Europe/Copenhagen	2025-09-15T21:55:29+02:00
Address Type	Category	District
Unicast	Internet Technology	Copenhagen Municipality
AS Number	AS Name	Hosted Domain
44034	Hi3G Access AB	-
Proxy	Proxy Provider	Fraud Score
Weather	Time Zone	Local Time
View Weather	Europe/Copenhagen	2025-09-15T21:55:29+02:00
Address Type	Category	District
Unicast	Internet Technology	Copenhagen Municipality



Source: Google Maps

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EXHIBIT 2

Defendant made no attempt to notify Plaintiff prior to removing the case to Federal Court. Upon receiving an e-mail, Plaintiff tried calling with no answer. The only call from Counsel was 1 minute; Plaintiff had to call back twice to even figure out what was happening.

Bill & pay Usage Account Shop Benefits Contact & support Cart

Data Messages **Calls**

Total calls:
463 minutes

Q (312) 207-2954

Showing 4 records
[Download all records](#)

Date (Pacific) ▾	Number ▾	Destination ▾	Minutes ▾	Type ▾
06/12/2025 11:41 AM	(312) 207-2954	to Chicago/IL	2 Min	Wi-Fi call
06/12/2025 11:45 AM	(312) 207-2954	to Chicago/IL	3 Min	Wi-Fi call
06/16/2025 01:25 PM	(312) 207-2954	Incoming	1 Min	Wi-Fi call
06/16/2025 03:07 PM	(312) 207-2954	to Chicago/IL	1 Min	Wi-Fi call

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EXHIBIT 3

Counsel, made statements to obstruct Plaintiff’s discovery efforts, despite a clear Court order to begin discovery now (Dkt 71)

RE: RE:



Ellena, Katherine J. <KEllena@reedsmith.com>

To matthew@winteryear.com; Graue, Emily H.; Valencia, Heather R.; Galibois, Michael B.



Fri 9/12

Mr. Walsh,

As we mentioned before, any form of discovery is premature prior to the occurrence of a Rule 26(f) conference, which the parties have not conducted. See Fed. R. Civ. Pro. 26(d) (stating “[a] party may not seek discovery from any source before the parties have conferred as required by Rule 26(f).”); see also *Lombana v. Green Tree Servicing, LLC*, 2016 U.S. Dist. LEXIS 187611, at *2-3 (C.D. Cal. 2016) (holding that when the parties have not met and conferred concerning a discovery plan, discovery requests are premature); *Babakhanlou v. Los Angeles Cnty.*, 2024 U.S. Dist. LEXIS 219792, at *3 (C.D. Cal. 2024) (same); *LeSzczyński v. Kitchen Cube LLC*, 2024 U.S. Dist. LEXIS 75252, at *5-7 (C.D. Cal. 2024) (same).

At no time have the parties held a Rule 26(f) conference, as a Rule 26(f) conference specifically addresses the creation of a discovery plan. On September 9, 2025, Judge Wright issued a Notice of Intent to Issue a Scheduling Order on November 17, 2025, with the instruction that the parties meet and confer pursuant to Rule 26(f) 21 days prior to that date. (Dkt. 71). Since then, you have served RFAs, Interrogatories, and RFPs on my client, in addition to multiple additional subpoenas on Docusign. Until that Rule 26(f) conference has been held, your discovery requests, including the subpoenas, are premature. While I am traveling this week for an unrelated matter, I will respond to you with my availability to conduct a Rule 26(f) conference as soon as I am able. In the interim, Rokoko reserves all rights to move to quash and/or seek a protective order over the improper discovery requests that you continue to serve.

As a logistical matter, please refrain from sending emails to my executive assistant, Heather Valencia, only. As an attorney of record for this matter, I ask that I be copied on any email that you send regarding this matter.

Thanks,
Kat

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

¹ Unless there is a likelihood that upon motion by a party the Court would order that any or all discovery is premature, it is advisable for counsel to begin to conduct discovery actively before the Court issues a Scheduling Order. At the very least, the parties shall comply fully with the letter and spirit of Rule 26(a) and thereby obtain and produce most of what would be produced in the early stage of discovery, because in the Scheduling Order, the Court will impose tight deadlines to complete discovery.

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EXHIBIT 4

1 Counsel, made statements to obstruct Plaintiff's discovery efforts once he issued a
2 non-discovery subpoena which was intended to resolve a ghostwriting/forgery
3 issue.
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7 RE: RE:



8 Ellena, Katherine J. <KEllena@reedsmith.com>

9 To matthew@winteryear.com; Graue, Emily H.; Valencia, Heather R.; Galibois, Michael B.

8/7/2025



10  You replied to this message on 9/9/2025 2:41 PM.

11 Mr. Walsh:

12 Presently, both of your **subpoenas** directed to DocuSign are premature. Per Federal Rule of Civil Procedure
13 26(d), "[e]xcept in categories of proceedings exempted from initial disclosure under Rule 26(a)(1)(E), or when
14 authorized under these rules or by order or agreement of the parties, a party may not seek discovery from any
15 source before the parties have conferred as required by Rule 26(f)." None of the exceptions are met here, and
16 a Rule 26(f) conference has not taken place. Accordingly, the **subpoenas** are defective on their face.

17 Please immediately confirm that you will withdraw both **subpoenas**. Rokoko reserves all rights to object to the
18 propriety of the **subpoenas** on other grounds, including without limitation as to relevance and privacy.

19 Best,

20 **Katherine J. Ellena** | Senior Associate

21 kellena@reedsmith.com
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EXHIBIT 5

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3 Defendant Overby signing a sworn declaration which states that he works “day to
4 day” in Copenhagen and that the declaration was executed in Copenhagen,
5 Denmark. DocuSign metadata shows the signature was executed instead from
6 Tranbjerg, Midjylland — approximately 300 km (4 hours) away — where Overby
7 in fact resides and works.

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

12 19 I declare under penalty of perjury under the laws of the State of California and the
13 20 United States that the foregoing is true and correct.

14 22 Executed this 28th day of July, 2025, in Copenhagen, Denmark.

15 23 DocuSigned by:
16 24 Mikkel Overby
17 25 93D7DF65261E4B0...
Mikkel Overby

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19 cont. next page.
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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.
 Envelopeld 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
 93D7DF60261E48D...
 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

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](#)

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EXHIBIT 6

1 Defendant Overby claims their office is 886.4 square meters (~10,000ft).
2 The entire building with their basement HQ is 1,081 square feet with a 25x25 area
3 (at most) belonging to them. They later claimed the building behind the basement
4 is their office and that is what is 886.4 square meters. That entire building
5 (including an adjoining building) is only 1,940sqft or 180.28 meters square. Both
6 locations impossible of housing “30 employees”



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EXHIBIT 7

1 Defendant omitted from the Court that since 2016 they have owned commercial
2 property in San Francisco, CA at 44 Tehama St; and continued paying property
3 taxes into 2024.

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

5 *When Recorded Mail To:*

6 ROKOKO ELECTRONICS
7 44 TEHAMA ST
SAN FRANCISCO CA 94105

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

8 SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

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

10 **CERTIFICATE OF LIEN FOR UNSECURED PROPERTY TAXES**

(Filed pursuant to California Revenue and Taxation Code Section 2191.3, 2191.4)

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

12 I, David P. Augustine, Tax Collector of the City and County of San Francisco, State of California, do hereby certify that
13 there is on record in my office unpaid delinquent Unsecured Property taxes, which are duly assessed, computed and
14 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.

15 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	0044 TEHAMA ST	ASSESSMENT NO	17-401816	FISCAL YEAR	2017-2018
OWNER NAME	ROKOKO ELECTRONICS	LIEN AMOUNTS	\$800.86		

18 Said address being the last known address of the assessee from and after the time of filing of this certificate, the total
19 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
20 them, or any of them, before the date on which this lien expires.

21 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
22 and priority of a judgment for ten (10) years from the time of the recording of this instrument, unless sooner released or
otherwise discharged.

23 
24 David Augustine, Tax Collector
CITY AND COUNTY OF SAN FRANCISCO

25 **Dated:** Dec 20, 2017



Certificate Of Completion

Envelope Id: 4E60099391444EFBA6FBF9CD5BAA6F62

Status: Completed

Subject: DocuSign: Request for Business Tax PIN

Source Envelope:

Document Pages: 1

Signatures: 1

Envelope Originator:

Certificate Pages: 4

Initials: 0

TTX PINREQUEST

AutoNav: Enabled

1 Dr. Carlton B. Goodlett Place City Hall

EnvelopeId Stamping: Enabled

Room 140

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

San Francisco, CA 94102

ttx.pinrequest@sfgov.org

IP Address: 138.199.35.202

Record Tracking

Status: Original
12/2/2024 7:11:18 AM

Holder: TTX PINREQUEST
ttx.pinrequest@sfgov.org

Location: DocuSign

Signer Events

Signature

Timestamp

Mikkel Lucas Overby
mikkel@rokoko.com

Signed by:

8BCA3927ABA54E4...

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

Security Level:
DocuSign.email
ID: 1
12/2/2024 7:11:20 AM

Signature Adoption: Pre-selected Style
Using IP Address: 138.199.35.202

Electronic Record and Signature Disclosure:

Accepted: 12/2/2024 7:11:58 AM
ID: e593a051-5878-4f42-9437-5b5d606ace17

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EXHIBIT 8

1 Defendant claims he and 30 employees work day-to-day at their nearly 10,000sqft
2 HQ in Copenhagen, which as shown is physically impossible by size. Further, all
3 of Overby's e-mails come from his Apple computer from an IP address which
4 resolve to a TDC home business account in Midtjylland, within the city of
5 Tranbjerg (tip of a peninsula, across two islands) ~300 km away—[~8-hour daily
6 commute]— DocuSign records corroborate this.

6 Email header:

7 Received: from mail-lf1-f47.google.com ([209.85.167.47]:48584)
8 by gator3161.hostgator.com with esmtps (TLS1.2) tls
9 TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256
10 (Exim 4.98.1)
11 (envelope-from <mikkel@rokoko.com>
12 id 1uBwvc-00000003e1Z-3Rh7
13 for matthew@winteryear.com;
14 Mon, 05 May 2025 09:36:22 -0500

15 Received: by mail-lf1-f47.google.com with SMTP id 2adb3069b0e04-
16 54d65cb6e8aso5786573e87.1

17 for <matthew@winteryear.com>; Mon, 05 May 2025 07:36:15 -0700 (PDT)

18 **Received:** from smtpclient.apple ([87.48.131.206])
19 by smtp.gmail.com with ESMTPSA id 2adb3069b0e04-
20 54ea94ee377sm1703494e87.155.2025.05.05.07.36.03
21 (version=TLS1_2 cipher=ECDHE-ECDSA-AES128-GCM-SHA256 bits=128/128);
22 Mon, 05 May 2025 07:36:04 -0700 (PDT)

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

28 From: "Mikkel Lucas Overby" <mikkel@rokoko.com>

To: <matthew@winteryear.com>

References: <144601dbbd7b\$bd3696a0\$37a3c3e0\$@winteryear.com>

In-Reply-To: <144601dbbd7b\$bd3696a0\$37a3c3e0\$@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: AQQUOKOLTEsYqtKTrWT+Fc+NUKK5DAHtA2T5

X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=1e100.net; s=20230601; t=1746455768; x=1747060568;

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GEOLOCATION HOME IP GEOLOCATION API FREE DATABASES TUTORIALS ENGLISH

W3C Geolocation API Demo

Country Denmark 🇩🇰	Region Midtjylland	City Tranbjerg
ZIP or Postal Code 8361	Latitude 56.09012	Longitude 10.11907
ISP TDC Holding A/S	Domain Name tdc.dk [WHOIS] [Check Mail Server]	Usage Type ISP/MOB
Weather View Weather	Time Zone Europe/Copenhagen	Local Time 2025-08-16T21:55:42+02:00
Address Type Unicast	Category Internet Technology	District Aarhus Municipality

MailboxValidator
REDUCE EMAIL Bounce Rate
www.mailboxvalidator.com

FREE IP GEOLOCATION API TOOL
TRY FOR FREE
IP Geolocation API
Domain WHOIS API
Reverse Data

VISUALIZE IP ADDRESSES ON WORLD MAP
TRY IT NOW

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GEOLOCATION HOME IP GEOLOCATION API FREE DATABASES TUTORIALS ENGLISH

W3C Geolocation API Demo

Country Denmark 🇩🇰	Region Midtjylland	City Tranbjerg
ZIP or Postal Code 8361	Latitude 56.09012	Longitude 10.11907
ISP TDC Holding A/S	Domain Name tdc.dk [WHOIS] [Check Mail Server]	Usage Type ISP/MOB
Weather View Weather	Time Zone Europe/Copenhagen	Local Time 2025-08-16T21:55:42+02:00
Address Type Unicast	Category Internet Technology	District Aarhus Municipality

GeoDataSource
World Major Cities
Database, Web Service & Component
www.geodatasource.com

FREE IP GEOLOCATION API TOOL
TRY FOR FREE
IP Geolocation API
Domain WHOIS API
Reverse Data

VISUALIZE IP ADDRESSES ON WORLD MAP
TRY IT NOW

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google.com/maps/dir/Tranbjerg+J,+Denmark/copenhagen/@55.8406744,9.9327211,8z/data=!4m14!4m13!1m5!1m1!1s0x464c41...

Best 3h 9m 4h 7m 1 day 8 hr

Tranbjerg J, Denmark

Copenhagen, Denmark

Leave now Options

Send directions to Unihertz Titan Slim Copy link

via Aarhus - Sjællands Odde and Route 21 3 hr 10 min 197 km Best route

via E20 3 hr 9 min 300 km

10:04 PM—2:12 AM (Sunday) 4 hr 8 min
 17 IC
 10:09 PM from Tranbjerg Kirke/Landevejen (Aarhus Kom)
 9 min
 Details

Explore Copenhagen
 Restaurants Hotels Bars Coffee More

Map data ©2025 Google, GeoBasis-DE/BKG (©2009) United States Terms Privacy Send Product Feedback

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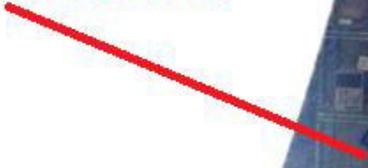
EXHIBIT 9

1 Private investigator photos showing the “HQ” in Copenhagen mid-day on a Friday.
2 Closed and shuttered except for one person arriving by bike for 10 minutes.



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Rokoko Head Cams



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EXHIBIT 10

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Defendant says Plaintiff never notified them of any prior intents to file Ex-Parte. E-mail records show they received such notice on June 16, 2025 and again on July 6, 2025.

RE: Notice - Ex Parte Application for Additional Time to Respond to the Co...



matthew@winteryear.com

To 'Graue, Emily H.'

Cc 'Galibois, Michael B.'; 'Ellena, Katherine J.'



6/16/2025

Emily,

As you are running my state clocks out, I now intend to file an ex-parte TRO along with an emergency motion to stay al proceedings pending jurisdictional determination.

Do you intend to oppose my motion for Remand, or should I consider that it will remain unopposed?

Also do you intend to oppose my TRO?

Do you intend to oppose my emergency motion to stay proceedings?

Thanks!
Matt

1 RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronic...



2 matthew@winteryear.com

3 To: 'Paredes, Valerie S.'
Cc: 'Ellena, Katherine J.'; 'Valencia, Heather R.'



7/6/2025

4 You replied to this message on 7/6/2025 4:46 PM.

5 As mentioned previously, I will be filing an **ex parte** application to have my motion heard and proceedings stayed until it is ruled on.

6 **From:** matthew@winteryear.com <matthew@winteryear.com>
7 **Sent:** Friday, July 4, 2025 4:46 PM
8 **To:** 'Paredes, Valerie S.' <VParedes@reedsmith.com>
9 **Cc:** 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>
10 **Subject:** RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

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

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

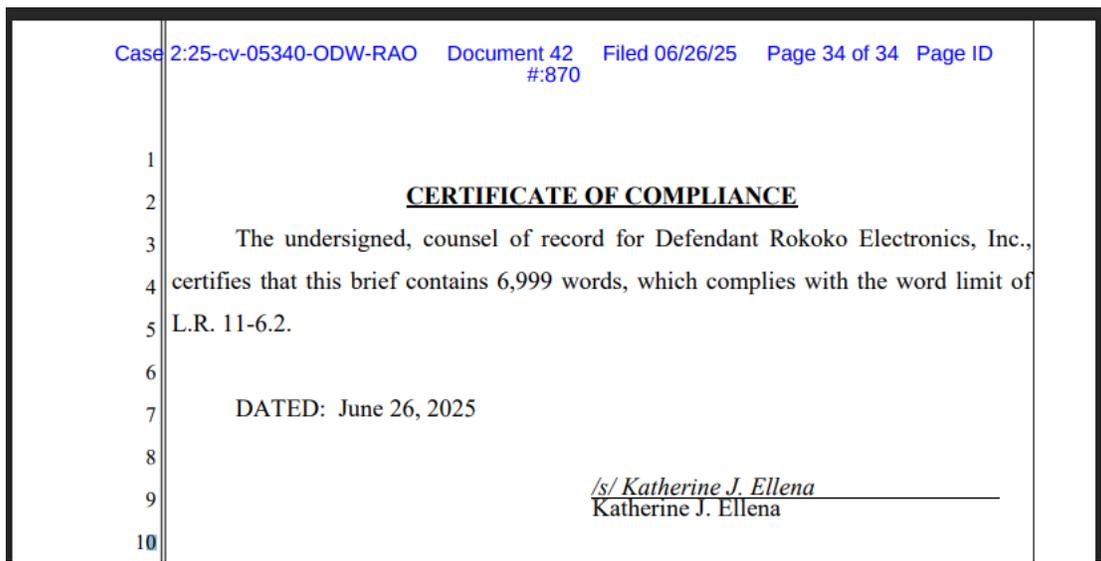
17 Please let me know when your next availability is, also, please keep it professional this time – I don't want another repeat of our last meeting:

- 18 - Being literally yelled at to the point I had to continually threaten to end the call if she didn't calm

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EXHIBIT 11

Defendant’s Motion to Dismiss claims their word count of 6,999 words (7,000 is the limit) was accurate, Plaintiff demonstrates otherwise:



```
python
from PyPDF2 import PdfReader

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

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

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

Result
14636
```

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

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EXHIBIT 12

1 Defendant's Motion to Dismiss does not contain a memorandum of points and
2 authorities. In fact, the word memorandum only appears *twice* in the document.
3 Once in the header, once in the certification at the end of the document. Nowhere
4 in the body as required.

14 REED SMIF
15 A limited liability partnership
16
17 MATTHEW R. WALSH
18 Plaintiff,
19 vs.
20 ROKOKO ELECTRONICS, and
21 DOES 1 through 50, inclusive,
22 Defendant.

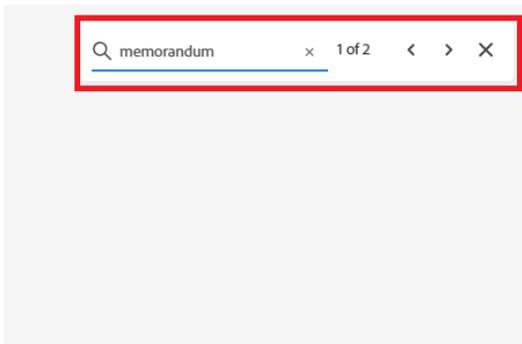
Case No.: 2:25-cv-05340-ODW-RAO
[Assigned to Hon. Otis D. Wright, II,
Courtroom 5D]

**DEFENDANT ROKOKO
ELECTRONICS' NOTICE OF
MOTION TO DISMISS AND
MOTION TO DISMISS
COMPLAINT; MEMORANDUM OF
POINTS AND AUTHORITIES**

Date: August 4, 2025
Time: 1:30 p.m.
Place: Dept. 5D

[Concurrently filed with Declaration of
Katherine Ellena; Request for Judicial
Notice; and [Proposed] Order]

State Court Action Filed: May 12, 2025

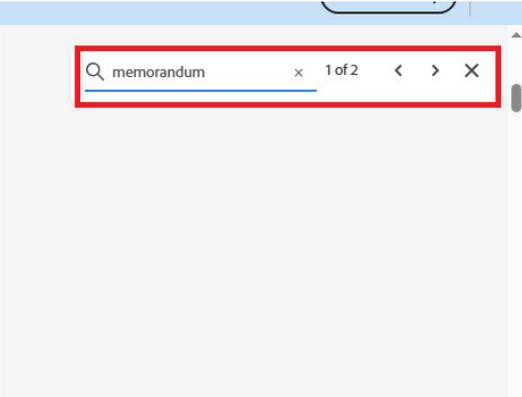


13 REED SMIF
14 A limited liability partnership
15
16 7-3. See Certification of Katherine Ellena attached hereto.
17 This Motion to Dismiss is based on this Notice of Motion, the supporting
18 Memorandum of Points and Authorities, Request for Judicial Notice, all of the
19 pleadings, filings, and records in this proceeding, all other matters of which the Court
20 may take judicial notice, and any argument and evidence that may be presented to or
21 considered by the Court prior to its ruling.

DATED: June 26, 2025 REED SMIF LLP

By: /s/ Katherine J. Ellena
Katherine J. Ellena
Michael Galibois (pro hac vice)
Emily Graue (pro hac vice)

Attorneys for Defendant
Rokoko Electronics



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EXHIBIT 13

1 Evidence of signature forgery, ghostwriting by Emily Graue and placing the
2 signature of Katherine J. Ellena.

3 Step 1: extract the PDF metadata.

```
4 Command Prompt
Microsoft Windows [Version 10.0.19045.6332]
(c) Microsoft Corporation. All rights reserved.

C:\Users\Matt>chdir C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata

C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata>exiftool -a -G -s "Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.pdf"
[ExifTool] ExifToolVersion : 13.31
[File] FileName : Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.pdf
[File] Directory : .
[File] FileSize : 2.4 MB
[File] ZoneIdentifier : Exists
[File] FileModifyDate : 2025:06:20 12:53:02-07:00
[File] FileAccessDate : 2025:09:15 14:51:02-07:00
[File] FileCreateDate : 2025:06:20 12:53:02-07:00
[File] FilePermissions : -rw-rw-rw-
[File] FileType : PDF
[File] FileTypeExtension : pdf
[File] MIMEType : application/pdf
[PDF] PDFVersion : 1.7
[PDF] Linearized : No
[PDF] HasXFA : No
[PDF] PageCount : 4
[PDF] CreateDate : 2025:06:12 16:29:15-04:00
[PDF] ModifyDate : 2025:06:12 17:35:00-04:00
[PDF] Creator : Aspose Ltd.
[PDF] Producer : Aspose.PDF for .NET 22.6.0
[XMP] Format : application/pdf
[XMP] CreateDate : 2025:06:12 16:29:15-04:00
[XMP] ModifyDate : 2025:06:12 14:06:20-07:00
[XMP] MetadataDate : 2025:06:12 14:06:20-07:00
[XMP] DocumentID : uuid:829740b1-222b-4a73-96b8-7c2bfe583510
[XMP] InstanceID : uuid:57fef664-970b-4812-b5e8-0d5354529551
[XMP] HistoryAction : editedScannedDoc
[XMP] HistoryWhen : 2025:06:12 14:06:20-07:00
[XMP] HistoryParameters : Page:1

C:\Users\Matt\Desktop\Rokoko Case\Evidence\Metadata>
```

Step 2: analyze and notice the last edits were in -04:00 timezone (Eastern/Chicago) this was found in all documents bearing Katherine J. Ellena's signature; which would be impossible if she was the signer as her timezone is -07:00 (Pacific/Los Angeles)

Ellena Declaration ISO Ex Parte.txt - Notepad		Rokoko - 2025-06-12 Civil Cover Sheet - AS FILED.txt - Notepad	
Create Date	: 2025:06:16 17:44:16-07:00	File Type Extension	: jpg
Metadata Date	: 2025:06:16 18:04:27-07:00	MIME Type	: image/jpeg
Document ID	: uuid:fb7503a3-9f07-4746-8988-...	DCT Encode Version	: 100
Instance ID	: uuid:2ca74679-ee1f-43d6-860...	APP14 Flags 0	: (none)
Page Count	: 10	APP14 Flags 1	: (none)
Embedded Image Color Space	: DeviceRGB	Color Transform	: Unknown (RGB or CMYK)
Embedded Image Filter	: DCTDecode	Image Width	: 1275
Embedded Image Height	: 373	Image Height	: 1650
Embedded Image Width	: 1846	Encoding Process	: Baseline DCT, Huffman coding
Embedded Image	: (Binary data 34930 bytes, use -b op	Bits Per Sample	: 8
File Type	: JPEG	Color Components	: 1
File Type Extension	: jpg	Embedded Image Color Space	: DeviceGray
MIME Type	: image/jpeg	Embedded Image Filter	: DCTDecode
JFIF Version	: 1.01	Embedded Image Height	: 88
Resolution Unit	: inches	Embedded Image Width	: 400
X Resolution	: 96	Embedded Image	: (Binary data 4009 bytes, use -b op
Y Resolution	: 96	File Type	: JPEG
Image Width	: 1846	File Type Extension	: jpg
Image Height	: 373	MIME Type	: image/jpeg
Encoding Process	: Baseline DCT, Huffman coding	DCT Encode Version	: 100
Bits Per Sample	: 8	APP14 Flags 0	: (none)
Color Components	: 3	APP14 Flags 1	: (none)
Y Cb Cr Sub Sampling	: YCbCr4:2:0 (2 2)	Color Transform	: Unknown (RGB or CMYK)
Embedded Image Color Space	: DeviceGray	Image Width	: 400
Embedded Image Filter	: FlateDecode	Image Height	: 88
Embedded Image Height	: 5	Encoding Process	: Baseline DCT, Huffman coding
Embedded Image Width	: 5	Bits Per Sample	: 8
File Type	: (unsupported)	Color Components	: 1
Embedded Image Color Space	: Indexed, DeviceRGB, 255	Embedded Image Color Space	: Indexed, DeviceRGB, 255
Embedded Image Filter	: FlateDecode	Embedded Image Filter	: FlateDecode
Embedded Image Height	: 40	Embedded Image Height	: 40
Embedded Image Width	: 180	Embedded Image Width	: 180
File Type	: (unsupported)	File Type	: (unsupported)
Create Date	: 2025:06:16 17:44:16-07:00	Create Date	: 2025:06:12 16:29:15-04:00
Modify Date	: 2025:06:16 21:26:52-04:00	Modify Date	: 2025:06:12 17:35:00-04:00
Creator	: Aspose Ltd.	Creator	: Aspose Ltd.
Producer	: Aspose.PDF for .NET 22.6.0	Producer	: Aspose.PDF for .NET 22.6.0
Image Size	: 1846x373	Image Size	: 1275x1650
Megapixels	: 0.689	Megapixels	: 2.1

Ellena Declaration ISO Ex Parte

Civil Cover Sheet bearing Katherine's signature

Ex Parte Motion for Extension of Time.txt - Notepad		Rokoko - 2025-06-12 Notice of Removal - AS FILED.txt - Notepad	
ExifTool Version Number	: 13.31	Embedded Image Color Space	: DeviceRGB
File Name	: Ex Parte Motion for Extension	Embedded Image Filter	: DCTDecode
Directory	: .	Embedded Image Height	: 148
File Size	: 212 kB	Embedded Image Width	: 150
Zone Identifier	: Exists	Embedded Image	: (Binary data 17960 bytes, use
File Modification Date/Time	: 2025:06:20 15:31:52-07:00	File Type	: JPEG
File Access Date/Time	: 2025:06:20 15:43:57-07:00	File Type Extension	: jpg
File Creation Date/Time	: 2025:06:20 15:31:52-07:00	MIME Type	: image/jpeg
File Permissions	: -rw-rw-rw-	JFIF Version	: 1.02
File Type	: PDF	Resolution Unit	: None
File Type Extension	: pdf	X Resolution	: 100
MIME Type	: application/pdf	Y Resolution	: 100
PDF Version	: 1.6	Quality	: 100%
Linearized	: Yes	DCT Encode Version	: 100
Create Date	: 2025:06:16 17:26:27-07:00	APP14 Flags 0	: [14], Encoded with Blend-1 dow
Modify Date	: 2025:06:16 21:26:52-04:00	APP14 Flags 1	: (none)
Creator	: Aspose Ltd.	Color Transform	: YCbCr
Producer	: Aspose.PDF for .NET 22.6.0	Image Width	: 150
Has XFA	: No	Image Height	: 148
Create Date	: 2025:06:16 17:26:27-07:00	Encoding Process	: Baseline DCT, Huffman coding
Modify Date	: 2025:06:16 17:56:48-07:00	Bits Per Sample	: 8
Metadata Date	: 2025:06:16 17:56:48-07:00	Color Components	: 3
Format	: application/pdf	Y Cb Cr Sub Sampling	: YCbCr4:4:4 (1 1)
Document ID	: uuid:1122b6c7-e29b-4ea8-b309-...	Embedded Image Color Space	: Indexed, DeviceRGB, 27
Instance ID	: uuid:9722d856-8257-4aa9-a0d3-...	Embedded Image Filter	: FlateDecode
Page Count	: 8	Embedded Image Height	: 87
Embedded Image Color Space	: Indexed, DeviceRGB, 255	Embedded Image Width	: 246
Embedded Image Filter	: FlateDecode	File Type	: (unsupported)
Embedded Image Height	: 40	Embedded Image Color Space	: Indexed, DeviceRGB, 255
Embedded Image Width	: 180	Embedded Image Filter	: FlateDecode
File Type	: (unsupported)	Embedded Image Height	: 40
		Embedded Image Width	: 180
		File Type	: (unsupported)
		Create Date	: 2025:06:12 10:24:49-07:00
		Modify Date	: 2025:06:12 17:35:00-04:00
		Creator	: Aspose Ltd.
		Producer	: Aspose.PDF for .NET 22.6.0
		Image Size	: 1105x1430
		Megapixels	: 1.6

Ex-parte motion for extension of time

Notice of removal

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Created by unadmitted counsel p1

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

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET. I. (a) PLAINTIFFS (Check box if you are representing yourself) [X] (b) DEFENDANTS (Check box if you are representing yourself) []

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET. II. BASIS OF JURISDICTION (Place an X in one box only) III. VENUE (Your answers to the questions below will determine the division of the Court to which this case will be initially assigned.)

Created by unadmitted counsel p2

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET. IX(a). IDENTICAL CASES: Has this action been previously filed in this court? IX(b). RELATED CASES: Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court?

Created by unadmitted counsel p3

CERTIFICATE OF SERVICE. I, the undersigned, being a member of the bar of the State of California, over the age of eighteen years, and not residing in the office of a member of the bar of the State of California, am ready, willing, and able to perform the duties of a member of the bar of the State of California.

Notarized signature area with text: I am ready, willing, and able to perform the duties of a member of the bar of the State of California.

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

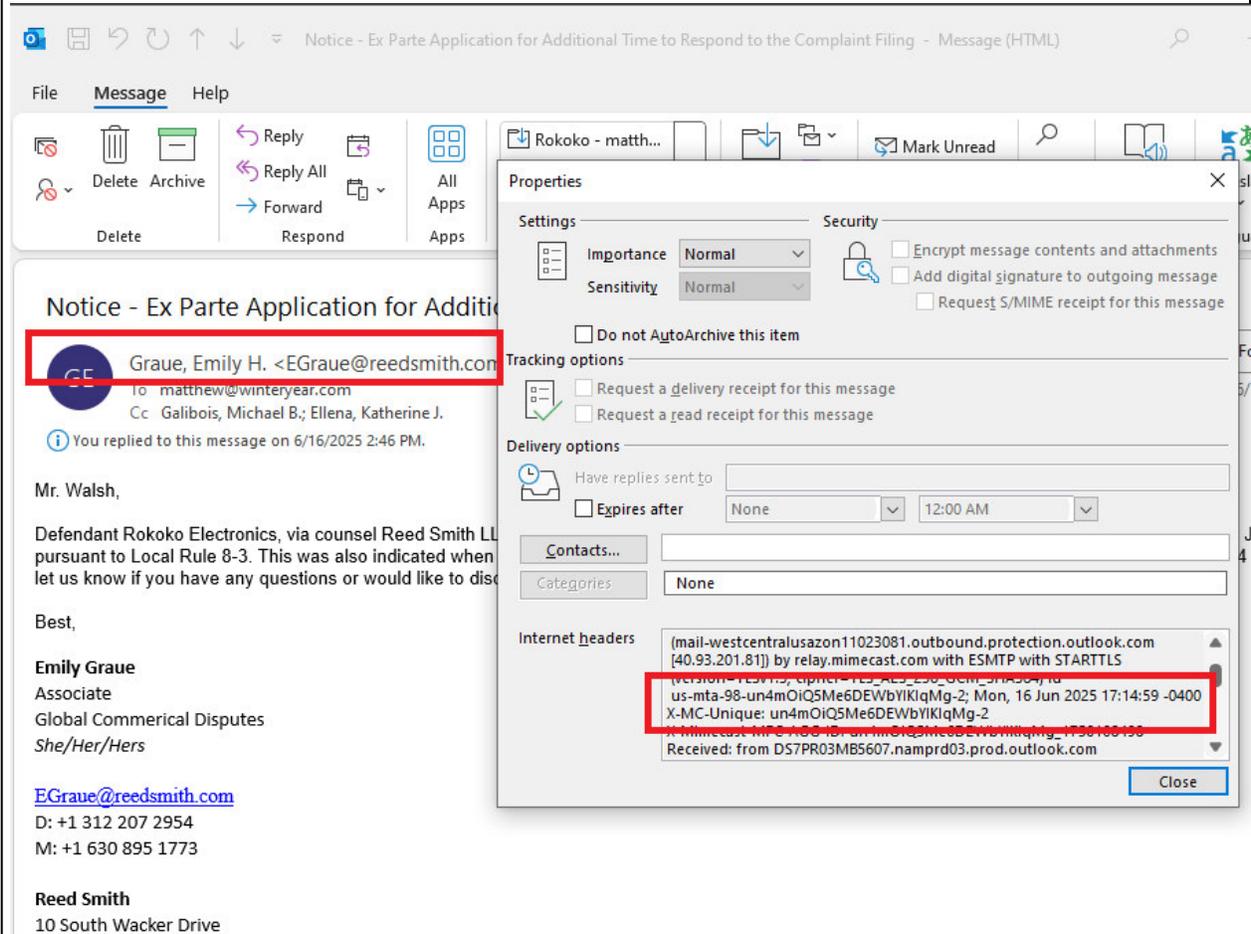
This is the only document actually created in Los Angeles.

Added by scanner - page 4

CERTIFICATE OF SERVICE

16 17 18 19 20 21 22 23 24 25 26 27 28

Step 3: Analyze e-mail headers from the attorneys and see who matches that -04:00 timezone. Emily Graue (Chicago based) was the only match.



Truncated e-mail header:

```

Return-Path: <egraue@reedsmith.com>
Delivered-To: matthew@winteryear.com
Received: from gator3161.hostgator.com
    by gator3161.hostgator.com with LMTP
    id IE7VG2OJUGhxJwgANiI7Wg
    (envelope-from <egraue@reedsmith.com>)
    for <matthew@winteryear.com>; Mon, 16 Jun 2025 16:15:15 -0500
Return-path: <egraue@reedsmith.com>
Envelope-to: matthew@winteryear.com
Delivery-date: Mon, 16 Jun 2025 16:15:15 -0500
Received: from us-smtp-delivery-164.mimecast.com ([170.10.133.164]:45523)
    by gator3161.hostgator.com with esmtps (TLS1.2) tls
    TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384

```

1 (Exim 4.98.1)
2 (envelope-from <egraue@reedsmith.com>
3 id 1uRHAh-000000021IR-1EAK
4 for matthew@winteryear.com;
5 Mon, 16 Jun 2025 16:15:15 -0500
6 DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=reedsmith.com;
7 s=mimecast20171211; t=1750108503;
8 h=from:from:reply-to:subject:subject:date:date:message-id:message-id:
9 to:to:cc:cc:mime-version:mime-version:content-type:content-type;
10 bh=F36B5ycb/3sAzfpI/Pvc5kxaG7DE7kJ06Wr0VgGt6cM=;
11 b=AfwCTaVCvAMqknau97sCd+4HEbptBwreQpM2SjdUz8IJN3PaMI93Xb7IJXM5pqX8bMVyv

k
7 NRFZGMIS783RbS2dAuQcCumrNaIEY2xkZj1wbC3h/pYVdfsLVOgjESASNLQV5vAuOrFpQj
8 win6XCE11Gtyb1kfwyqCVsz6LgPEj92MA84BWZyi2rmqKsE8RzIBONeC/gs25P6EVqiic1
9 GGmi7KZ3Hrlp/PDw++SZ364n+lvjpnGVAR0hEkEkT3FW2cATx/oPAB1L9HXTb73oIfpqpL
10 XFztuWe9K3DAY/A/FIm2aBBKzmeFP6aahokvWK8fKE3SUDcQvrfmCZhcWVY2Kw==

11 Received: from CY3PR05CU001.outbound.protection.outlook.com
12 (mail-westcentralusazon11023081.outbound.protection.outlook.com
13 [40.93.201.81]) by relay.mimecast.com with ESMTP with STARTTLS
14 (version=TLSv1.3, cipher=TLS_AES_256_GCM_SHA384) id
15 us-mta-98-un4mOiQ5Me6DEWbYIKIqMg-2; **Mon, 16 Jun 2025 17:14:59 -0400**

16 X-MC-Unique: un4mOiQ5Me6DEWbYIKIqMg-2
17 X-Mimecast-MFC-AGG-ID: un4mOiQ5Me6DEWbYIKIqMg_1750108498
18 Received: from DS7PR03MB5607.namprd03.prod.outlook.com (2603:10b6:5:2ce::21)
19 by CO1PR03MB5875.namprd03.prod.outlook.com (2603:10b6:303:90::21) with
20 Microsoft SMTP Server (version=TLS1_2,
21 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8835.29; Mon, 16 Jun
22 2025 21:14:54 +0000

23 Received: from DS7PR03MB5607.namprd03.prod.outlook.com
24 ([fe80::a0e4:2ab9:62a7:6eb1]) by DS7PR03MB5607.namprd03.prod.outlook.com
25 ([fe80::a0e4:2ab9:62a7:6eb1%5]) with mapi id 15.20.8835.025; Mon, 16 Jun
26 2025
27 21:14:53 +0000

28 From: "Graue, Emily H." <EGraue@reedsmith.com>
To: "matthew@winteryear.com" <matthew@winteryear.com>
CC: "Galibois, Michael B." <MGalibois@reedsmith.com>, "Ellena, Katherine J."
<Kellena@reedsmith.com>
Subject: Notice - Ex Parte Application for Additional Time to Respond to the
Complaint Filing
Thread-Topic: Notice - Ex Parte Application for Additional Time to Respond to
the Complaint Filing
Thread-Index: AdvfA5Uklv7cx5VoQcyLq5hhdjj1w==
Date: Mon, 16 Jun 2025 21:14:53 +0000

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EXHIBIT 14

1 Emily Graue continued practicing law by authoring the documents in Exhibit 11
2 and further by e-mail and phone after being removed from the Court docket on
3 June 15, 2025.

CM ECF		Civil	Criminal	Query	Reports	Utilities	Search	Help	Log Out
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 caed_attyadm@caed.uscourts.gov . You have been removed as counsel of record from the docket in this case, and you will not be added back to the docket until your Pro Hac Vice status has been resolved. (car) (Entered: 06/15/2025)							
06/15/2025	8	NOTICE OF PRO HAC VICE APPLICATION DUE for Non-Resident Attorney Michael Galibois. 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 caed_attyadm@caed.uscourts.gov . You have been removed as counsel of record from the docket in this case, and you will not be added back to the docket until your Pro Hac Vice status has been resolved. (car) (Entered: 06/15/2025)							
06/16/2025	9	(STRICKEN PER 6/20/2025 MINUTES DOCKET NO. 24). NOTICE OF MOTION AND MOTION for Enlargement of							

15 Notice - Ex Parte Application for Additional Time to Respond to the Compl...

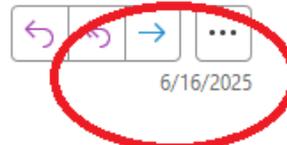


16 Graue, Emily H. <EGraue@reedsmi

To matthew@winteryear.com

Cc Galibois, Michael B.; Ellena, Katherine J.

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



19 Mr. Walsh,

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

24 Best,

25 **Emily Graue**

Associate

Global Commerical Disputes

She/Her/Hers

26 EGraue@reedsmith.com

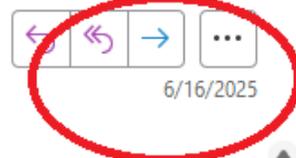
D: +1 312 207 2954

M: +1 630 995 1772

RE: Notice - Ex Parte Application for Additional Time to Respond to the Co...



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



6/16/2025

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

Case 2:25-cv-05340-ODW-RAO Document 15-1 Filed 06/16/25 Page 3 of 10 Page ID #:556

7. After the phone conversation, Mr. Walsh responded to Ms. Graue's email, but did not address the Motion for the Enlargement of Time. Instead stating his plan to file for Remand to the state court. See Exhibit 1.

8. Pursuant to L.R. 7-19, notice of this *ex parte* application was provided on June 16, 2025 via phone and email. Upon filing of this *ex parte* application, I will email a copy of the filed application and have copies delivered to Mr. Walsh at 19197 Golden Valley Rd. #333, Santa Clarita, CA 91387, the address listed for him in the Complaint. When Plaintiff was notified, he indicated that he would

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EXHIBIT 15

Katherine J. Ellena’s declaration, which forensics show was authored and actually signed by Emily Graue (Exhibit 11); contains hearsay from Emily Graue, further indicating she is the author.

DECLARATION OF KATHERINE J. ELLENA

I, Katherine J. Ellena, declare:

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

2. I submit this declaration in support of Defendant’s *Ex Parte* Application For Additional Time To Plead Or Otherwise Respond To Plaintiff’s Complaint.

3. Plaintiff’s Complaint consists of 256 pages of allegations and fourteen separate causes of action, including without limitation, fraudulent concealment, unconscionable contract terms, intellectual property infringement, and deceptive business practices. Given the seriousness of the allegations and the volume of the Complaint, Defendant requires additional time to evaluate the factual and legal merits of the Complaint.

4. Defendant is considering filing a motion to dismiss some, or all, of the causes of action asserted in the Complaint on various grounds, including failure to state a claim and statutes of limitations which, if granted, could substantially narrow or resolve the action.

5. On June 12 and June 13, 2025, I instructed my colleague, Emily Graue, to call and email Plaintiff to request his consent to a stipulation of time to respond to the Complaint. She did not receive an answer. Attached hereto as **Exhibit 1** is a true and correct copy of Ms. Graue’s email to Mr. Walsh.

6. On June 13, 2025, Plaintiff informed my office through a phone call that he intended to oppose any motion for enlargement of time. Ms. Graue informed me that Plaintiff stated to her on the phone that he “is going to oppose pretty much everything.”

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A limited liability partnership formed in the State of Delaware

7. After the phone conversation, Mr. Walsh responded to Ms. Graue's email, but did not address the Motion for the Enlargement of Time. Instead stating his plan to file for Remand to the state court. See Exhibit 1.

8. Pursuant to L.R. 7-19, notice of this *ex parte* application was provided on June 16, 2025 via phone and email. Upon filing of this *ex parte* application, I will email a copy of the filed application and have copies delivered to Mr. Walsh at 19197 Golden Valley Rd. #333, Santa Clarita, CA 91387, the address listed for him in the Complaint. When Plaintiff was notified, he indicated that he would oppose this motion. Attached hereto as **Exhibit 2** is a true and correct copy of his response.

9. Defendant removed this case to the Central District of California on June 12, 2025.

10. This is the first *ex parte* application and request for an extension of time Defendant has filed in this lawsuit.

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

/s/ Katherine J. Ellena
Katherine J. Ellena

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Attorney liability partnership formed in the State of California

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EXHIBIT 16

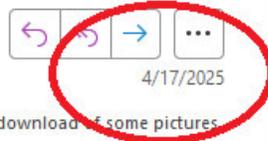
1 Defendant spoliated key evidence and destroyed all archived copies on May 1,
2 2025 after they had the complaint draft since April 17, 2025.

3 RE: [Rokoko] Re: This is a follow-up to your previous request #40651 "FW: ...



4 matthew@winteryear.com

5 To 'Rokoko'



4/17/2025

6 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.



7 Open PDFs in Adobe Acrobat X

8 Hi Dan,

9 Attached is a courtesy copy of the formal complaint I filed with the Superior Court of California, Los Angeles County. It has been electronically submitted and is currently pending clerk confirmation and case number assignment.

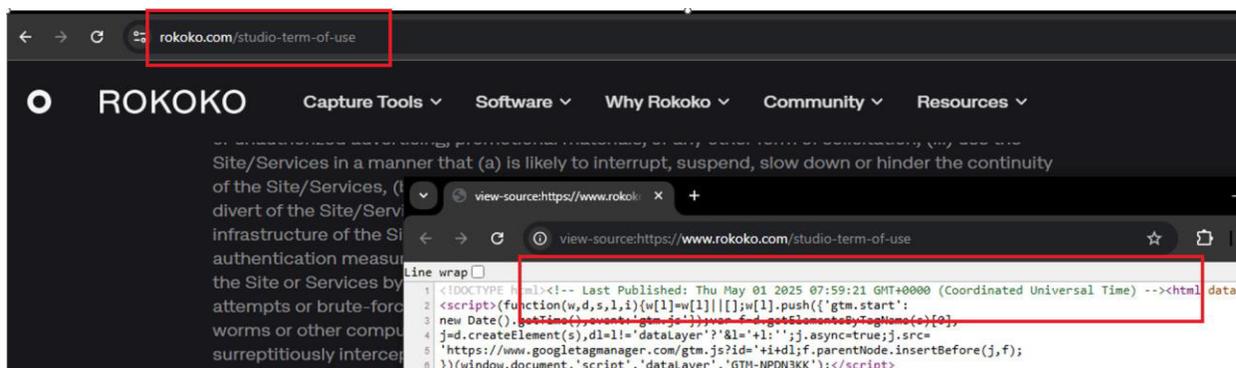
10 You will be served through proper legal channels shortly, but I wanted to provide this digital copy in advance out of professionalism and transparency so you can get a head start on your defense strategy.

11 [Back to message](#)

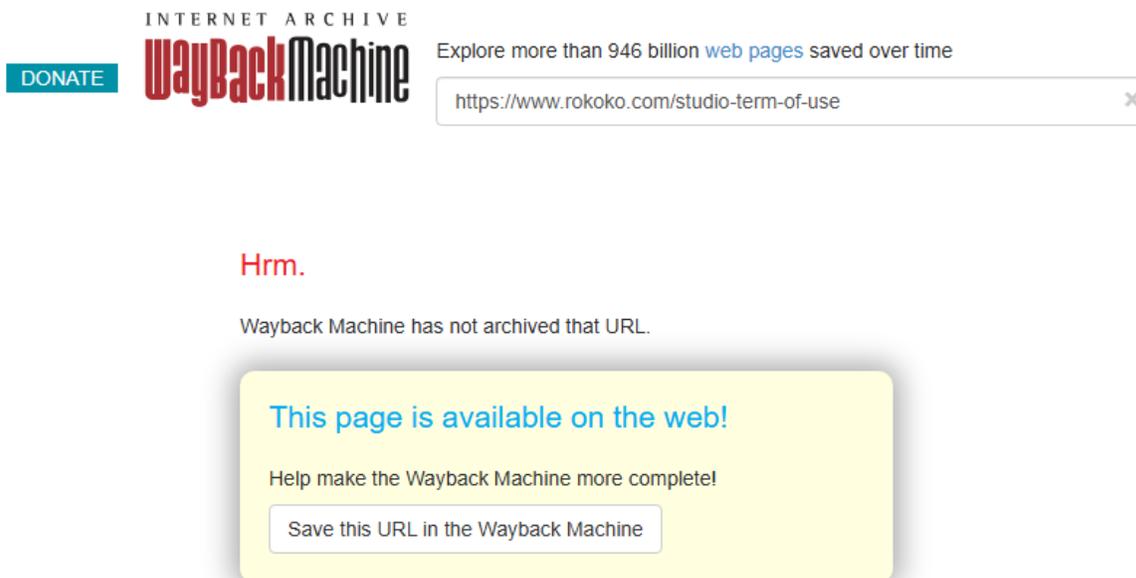


1	SUPERIOR COURT OF CALIFORNIA	
2	COUNTY OF LOS ANGELES	
3	4 MATTHEW R. WALSH 5 19197 GOLDEN VALLEY RD #333 6 SANTA CLARITA, CA 91387, 7 Plaintiff, 8 vs. 9 ROKOKO ELECTRONICS 10 166 GEARY ST. 15TH FL. #63. 11 SAN FRANCISCO, CALIFORNIA 94108, 12 Defendant	Case No.: _____ COMPLAINT FOR VIOLATION OF CONSUMER PROTECTION LAWS, RIGHT TO REPAIR, UNFAIR COMPETITION, FALSE ADVERTISING, CONSUMER WARRANTY ACT UNCONSCIONABILITY BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING
13	<u>VENUE AND JURISDICTION</u>	
14	Plaintiff brings the matter before this Court, as Plaintiff can demonstrate Defendant has sufficient	

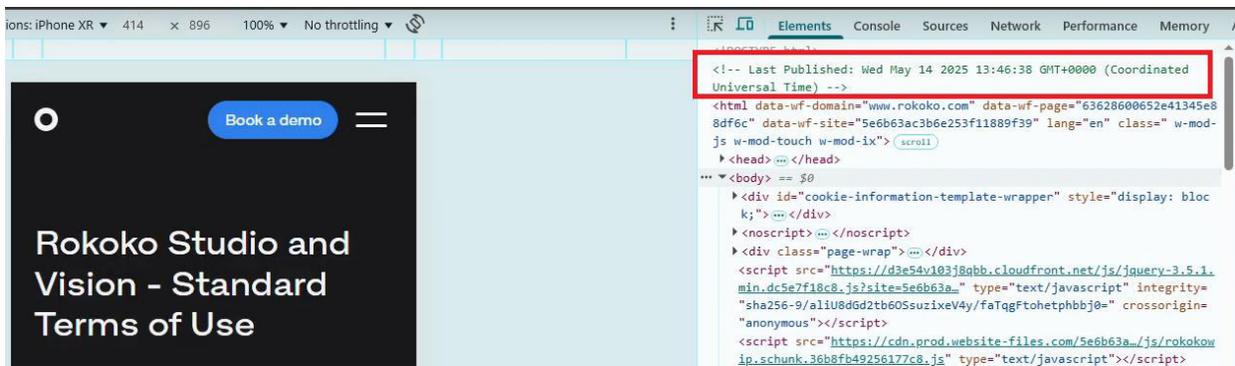
1 Defendant then spoliated evidence by changing the terms and conditions after
2 having a duty to preserve.



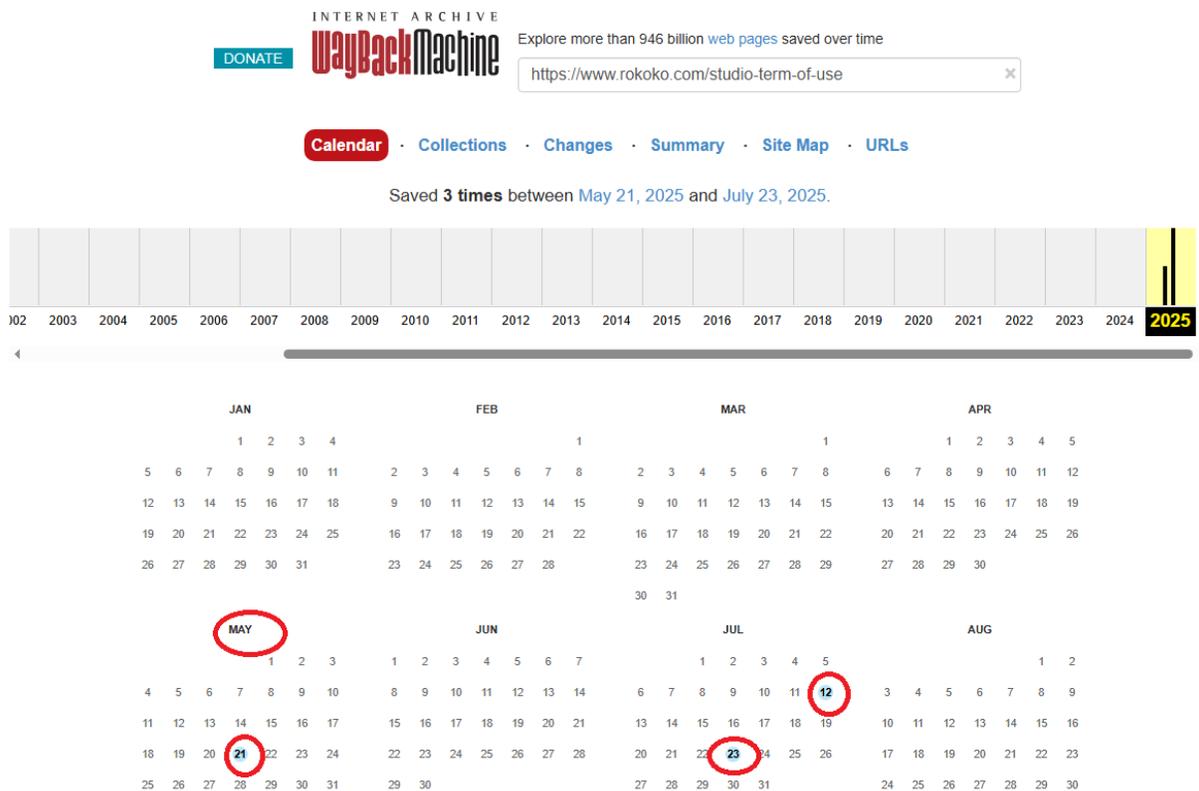
10 Defendant then removed the entire archive.org history of the website to destroy all
11 prior copies of the terms and conditions which **did not** contain retroactive IP rights
12 among many other things.



24 The Complaint was amended and refiled with the Superior Court on May 12, 2025.
25 Defendant was served on May 14, 2025. The Complaint referenced spoliation;
26 while under Counsel by ReedSmith, Defendant once again edited their website and
27 allowed the archive.org repository to begin indexing it again.



Since then, they have edited their terms and conditions another 3 times; and again, no notification to customers as they claim is their policy.



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EXHIBIT 17

Defendant Overby claims he is the COO and CFO to attempt to move the nerve center away from California; however, Jakob Balslev even today is listed as CEO, CFO and Secretary of the company and through 2024 had the company registered to his \$2M San Francisco luxury apartment.

DECLARATION OF MIKKEL OVERBY

I, Mikkel Overby, declare:

1. I am CFO and COO for Rokoko Electronics (“Rokoko”) and I have held these positions since April 2016. I make this declaration in support of the case titled *Matthew R. Walsh v. Rokoko Electronics, et. al.*, Case No. 25STCV13828 filed in the Superior Court of California, County of Los Angeles (the “State Court Action”). All of the information set forth herein is based on my personal knowledge or my review of Rokoko’s corporate records, and if called to testify and be sworn as a witness, I could and would competently testify thereto.

2. In my positions as CFO and COO I am familiar with and have personal knowledge of Rokoko’s corporate structure and business operations. I have access to and regularly refer to business

DECLARATION OF MIKKEL OVERBY

I, Mikkel Overby, declare:

1. I am CFO and COO for Rokoko Electronics, Inc. (“Rokoko”), and I have held these positions since April 2016. I make this declaration in support of Rokoko’s Opposition to Plaintiff’s Motion to Strike Rokoko’s removal. All of the information set forth herein is based on my personal knowledge or my review of Rokoko’s corporate records, and if called to testify and be sworn as a witness, I could and would competently testify thereto.

2. In my positions as CFO and COO, I am familiar with and have personal knowledge of Rokoko’s corporate structure and business operations. I have access to



BA20241277973



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
CORPORATION
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: BA20241277973

Date Filed: 7/10/2024

B2878-8695 07/10/2024 2:47 PM Received by California Secretary of State

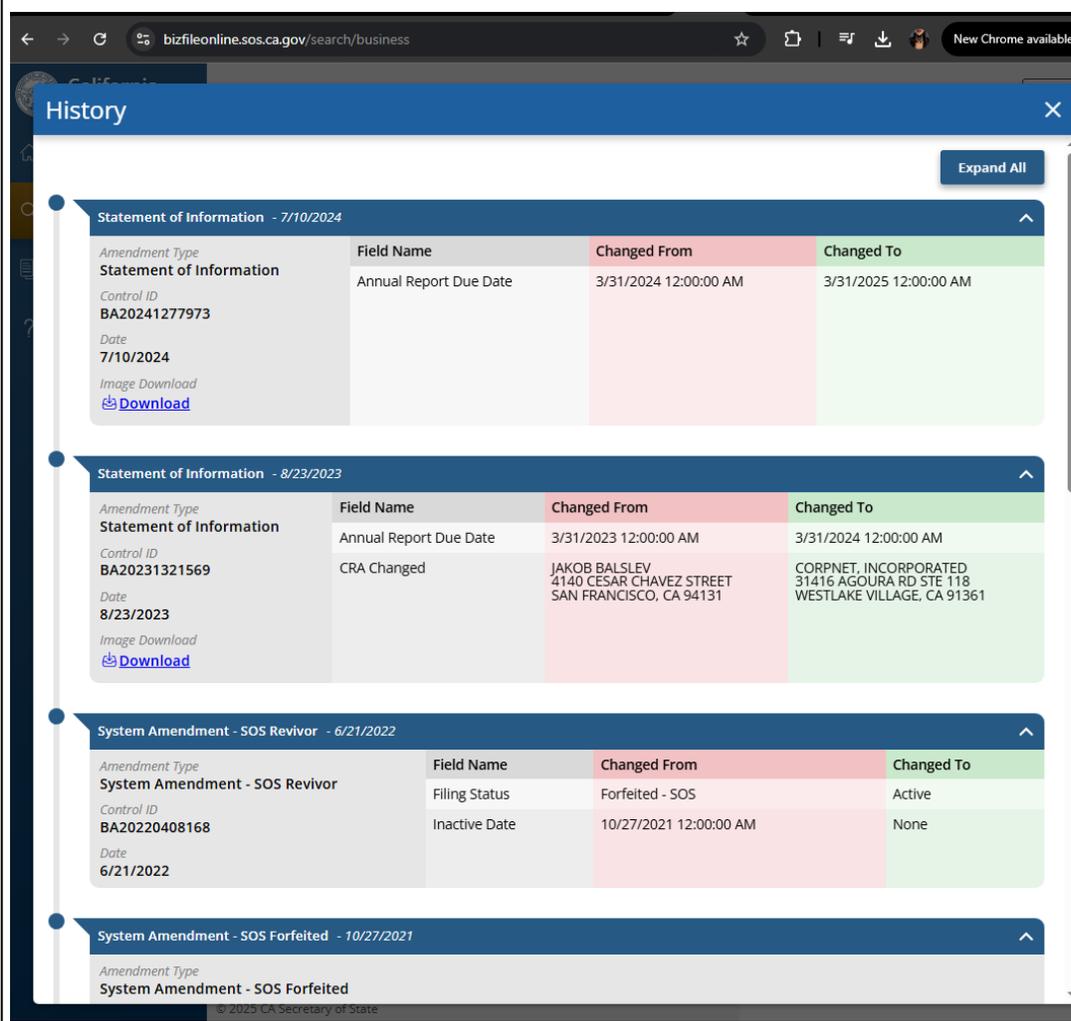
Entity Details			
Corporation Name	ROKOKO ELECTRONICS, INCORPORATED		
Entity No.	3890148		
Formed In	DELAWARE		
Street Address of Principal Office of Corporation Principal Address	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Mailing Address of Corporation Mailing Address	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Attention			
Street Address of California Office of Corporation Street Address of California Office	498 ALABAMA STREET SAN FRANCISCO, CA 94110		
Officers			
Officer Name	Officer Address	Position(s)	
JAKOB BALSLEV	Denmark MOERDRUPVEJ 15 A 1 4 ESPERGAERDE, 3060	Chief Executive Officer, Secretary, Chief Financial Officer	
Additional Officers			
Officer Name	Officer Address	Position	Stated Position
None Entered			

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EXHIBIT 18

On August, 21 2025, four days after Plaintiff presented evidence to the Court showing that Rokoko Electronics was registered to Defendant’s luxury apartment; Defendant Rokoko Electronics spoliated evidence by amending its filing on August 21, 2025 to remove that address and substitute a Sacramento registered agent. This change came only after Plaintiff exposed their California contacts in depth.

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Search | California Secretary of State | bizfileonline.sos.ca.gov/search/business

History

Expand All

Statement of Information - 8/21/2025

Field Name	Changed From	Changed To
Principal Address 1	498 ALABAMA STREET	1401 21ST ST.
Principal Address 2		STE. R
Principal Postal Code	94110	95811
Annual Report Due Date	3/31/2025 12:00:00 AM	3/31/2026 12:00:00 AM
CRA Changed	CORPNET, INCORPORATED 31416 AGOURA RD STE 118 WESTLAKE VILLAGE, CA 91361	REGISTERED AGENTS INC 1401 21ST STREET SUITE R SACRAMENTO, CA 95811

Statement of Information - 7/10/2024

Field Name	Changed From	Changed To
Annual Report Due Date	3/31/2024 12:00:00 AM	3/31/2025 12:00:00 AM

System Amendment - SOS Revivor - 6/21/2022

Field Name	Changed From	Changed To
Filing Status	Forfeited - SOS	Active
Inactive Date	10/27/2021 12:00:00 AM	None

© 2025 CA Secretary of State

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EXHIBIT 19

Mikkel Overby's second statement.

DocuSign Envelope ID: 741C2182-65A3-4897-9182-ED09aEA4385E Case 2:25-cv-05340-ODW-RAO Document 62-1 Filed 07/28/25 Page 2 of 6 Page ID #:1443

DECLARATION OF MIKKEL OVERBY

I, Mikkel Overby, declare:

1. I am CFO and COO for Rokoko Electronics, Inc. ("Rokoko"), and I have held these positions since April 2016. I make this declaration in support of Rokoko's Opposition to Plaintiff's Motion to Strike Rokoko's removal. All of the information set forth herein is based on my personal knowledge or my review of Rokoko's corporate records, and if called to testify and be sworn as a witness, I could and would competently testify thereto.

2. In my positions as CFO and COO, I am familiar with and have personal knowledge of Rokoko's corporate structure and business operations. I have access to and regularly refer to business records concerning Rokoko's corporate organization and operations. In connection with the preparation of this declaration, I reviewed certain documents described herein that were prepared and maintained in the ordinary course of Rokoko's business.

3. Rokoko's principal place of business is located at Sankt Gertruds Stræde 10, 1129 København, Denmark, from where Rokoko's senior executives—including myself—direct, control, and coordinate the company's primary business activities on a day-to-day basis, and where Rokoko's corporate and financial records are maintained in Denmark. It is the center of all management decisions, direction, control, and coordination for Rokoko.

4. The office in Denmark houses approximately 30 employees, including Rokoko's Founder & CEO, myself, and other senior level executives.

5. The Denmark office is approximately 886.4 square meters with a 62 square meter basement.

6. Denmark is where Rokoko's executives exercise enterprise-wide authority and make decisions including, but not limited to, those relating to policies and procedures.

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KEED SMITH LLP
A limited liability partnership licensed in the State of Delaware

1 human resources, legal affairs, finances, budgets, and general day-to-day operations and
2 administration of the business.

3 7. Since 2016, Rokoko's filings with the California Secretary of State have
4 identified Copenhagen as its principal executive office. Attached hereto as **Exhibit A**
5 is a true and correct copy of Rokoko's Statement and Designation by Foreign
6 Corporation, filed with the California Secretary of State on March 25, 2016.

7 8. Rokoko's key executive officers—including its Founder & CEO, myself, and
8 Matias Sondergaard—reside in Copenhagen and conduct the majority of our general
9 operations from Denmark. None of Rokoko's executives reside in California.

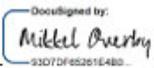
10 9. While Jakob Balslev, Rokoko's Founder & CEO, lived in California from
11 September 2016 to January 2020, he returned to live in Copenhagen in 2020 and has
12 lived there since.

13 10. Rokoko has one employee in California, who reports to Rokoko's CEO and
14 myself in Copenhagen. Within the last year, Rokoko transitioned from leasing space in
15 a co-working office in San Francisco, California to a completely virtual office.

16 11. Rokoko Electronics, Inc. has never had any interest in an entity known as Rokoko
17 LLC, or any Delaware LLC at any point in time.

18
19 I declare under penalty of perjury under the laws of the State of California and the
20 United States that the foregoing is true and correct.

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

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25 Mikkel Overby

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EXHIBIT 20

1 Mikkel Overby admitting Rokoko Care changed it’s name to avoid confusion,
2 while Counsel specifically told the Court “**Allegations that Rokoko changed its**
3 **name to avoid confusion**” and “*these are merely conclusory allegations*”

4
5 Re: Case dismissed, new case filed.



6 Mikkel Lucas Overby <mikkel@rokoko.com>
7 To matthew@winteryear.com



5/5/2025

8 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures
9 in this message.



10 Hi Matthew

11 Thank you for sharing the complaint. We have read it in full and want to share our initial response
12 - we can come back with more details later. Generally, we see that it relies on a number of mis-
13 understandings and misinterpretations of observations, which we are able to easily clarify and
14 explain. We believe both parties will benefit from us doing this, as it will save us all a lot of time
15 and effort.

16 A few non-exhaustive, short but important comments:

- 17 • **We have never misappropriated yours, of any other users, intellectual property.** We
18 have always been transparent in how we use and treat user motion data through our Terms
19 of Use. We continued this path earlier this year, when we made and communicated an
20 update to these. Still, to date, no commercial licensing of any user motion data has been
21 done. Also, no user data has to date been used for any of our products. This is easily veri-
22 fiable.
- 23 • **Formation of “Coco Care” is not to shield liability in any way.** “Care” evolved as a
24 research project in Rokoko. It was run by a dedicated team and had nothing to do with the
25 motion data generated by the creators using our tools. When the project matured, it was
26 spun off as a separate legal entity along with the tech that the Care team had developed.
27 Today, it has no affiliation with Rokoko and we therefore also required that they changed
28 the company name to avoid confusion. All parties involved from including the team, legal
counsel and accountants will confirm this.
- **We do not make fraudulent representations.** We do have inventory with a third party
logistics provider (however, we are handling the more complex repair cases from our main
office, which is why the repair case shipping refers to this location), we do have offices (and
the Copenhagen office is not in a basement, but over the 4 floors in the building behind
the basement), we do not have fraudulent financial statements (our reports are audited
annually by KPMG, who can support that). What we can admit to, which 95% of early stage
tech companies can as well, is to historically have been overly optimistic about our growth

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EXHIBIT 21

Counsel has been notified in almost every filing as well as e-mails and the 7-3 conference that Sanctions would be forthcoming.

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.'



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

Cc: Ellena, Katherine J. <KEllena@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

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

I intend to move to strike your entire removal as improper under 28 U.S.C. § 1446(d) and all subsequent documents for deficiencies mentioned prior and seek sanctions and strip statutory tolling protections when we return to state court.

Do you intend to object?

From: Valencia, Heather R. <HValencia@ReedSmith.com>

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.'



You replied to this message on 6/20/2025 3:12 PM.
This message was sent with High importance.

Hello again everyone,

This message serves as final notice pursuant to the meet and confer requirement.

Attached is a forensic summary and time zone breakdown demonstrating that your June 12 Notice of Removal was authored and created in the Eastern Time Zone by unadmitted counsel, then altered and patched in the Pacific Time Zone via scanned document injection — specifically to attach the only page bearing a valid signature, the Proof of Service. The metadata confirms the timeline, authorship locations, and sequence of assembly. This is the document that transferred jurisdiction.

Your removal was procedurally improper and filed in violation of Rule 11. This constitutes unauthorized practice of law.

I urge you to voluntarily withdraw the removal and recuse yourselves from this matter.

Absent that, I will file the full evidentiary record, along with forensic data on all files authored by your firm, especially after removal from the docket with the Court and seek all available remedies, including sanctions and referral.

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.'



6/20/2025

Counsel,

You have received multiple documented communications containing forensic proof of unauthorized filings, post-removal misconduct, and active violation of the Court's directive.

Let me be clear:

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

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

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

There will be no further warnings

1 RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronic...



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



4 *i* You replied to this message on 7/7/2025 11:51 AM.

5 [PROPOSED] Order granting Plaintiffs Ex Parte Application.pdf
137 KB

6 Plaintiffs Ex Parte Application.pdf
4 MB

- 7 3. You openly lied about the word count citing 6999 words in your certificate of compliance, 1 less than the allowed amount; yet, the word count was really north of 14,500.
- 8 4. It is procedurally defective, and so dense, it cannot be responded to or opposed – which seems by design.
- 9 5. For other procedural defects.

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

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

16 I expect professionalism, as you are required to do by your code of conduct.
17 That call was transcribed by the way. I am considering releasing it to the Court as further evidence towards sanctions.

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

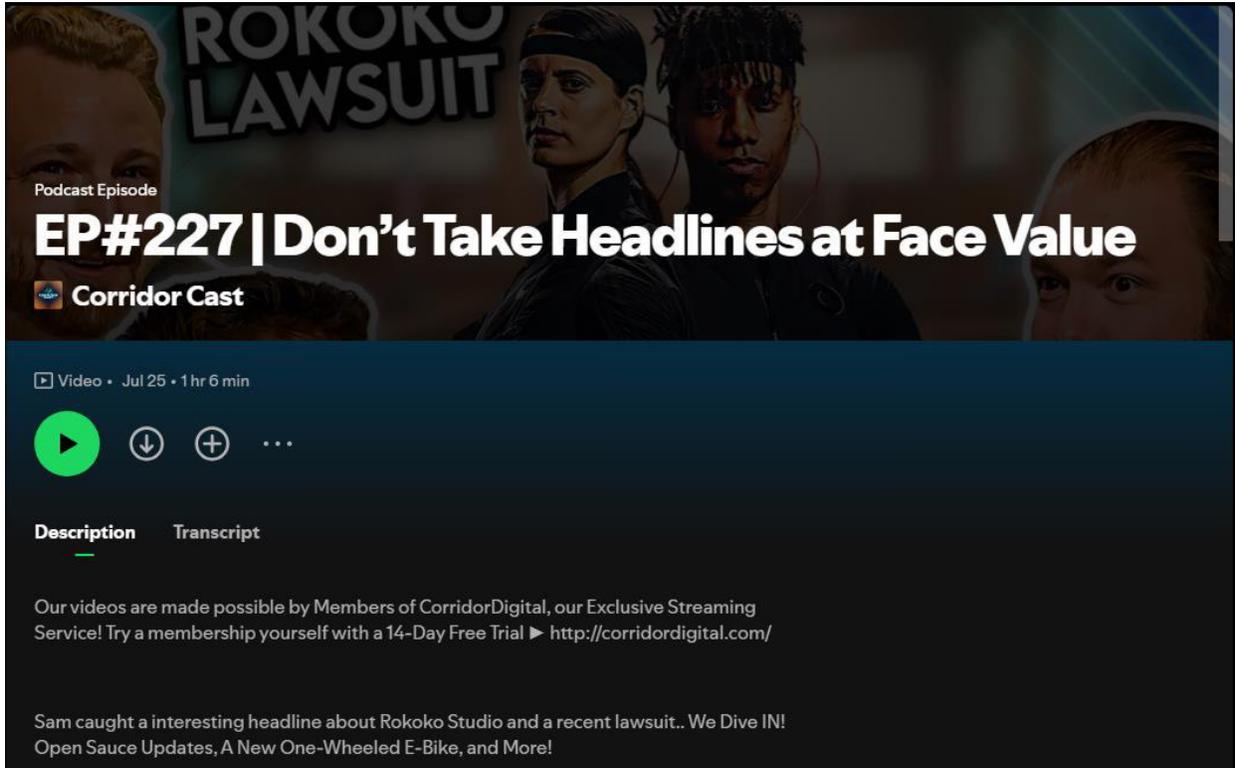
19 Thank you,
20 Matthew R. Walsh

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EXHIBIT 22

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Evidence demonstrates that Rokoko and Corridor Digital have a previous mutual relationship prior to Corridor Digital speaking to their 10M listeners echoing Defendant’s sentiments showing Defendant is the harasser; not Plaintiff.



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Rokoko Artist spotlight: meet p x +

rokoko.com/insights/an-interview-with-vfx-genius-clinton-jones-aka-pwnisher

Capture Tools Software Use cases Community Resources

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Ex-Corridor Digital employee and super talented VFX artists - probably one of the most well known 3D creators out there - known for his community and massive 3D challenges on [his YouTube channel](#), sat down with Rokoko to look back at his achievements and his journey as a digital creator. In the world of 3D art, Clinton Jones, better known by his online pseudonym, "The Pwnisher", is a name that has been making waves in recent years. With his exceptional talent for bringing his imagination to life through stunning 3D renderings, Clinton has established himself as one of the most sought-after artists in the industry. In this blog article, we will be exploring the journey of Clinton Jones and how he became known as "The Pwnisher", as well as delving into his unique style and creative process. Whether you're an aspiring artist or simply a lover of 3D art, you won't want to miss this in-depth look into the life and work of one of the most exciting artists of our time.

Table of contents

- [If you had to choose, what is the single most defining characteristic that makes you, you?](#)
- [What would you say are the three key ingredients when learning 3D?](#)
- [How have your goals with VFX/CGI changed through the years?](#)
- [What does an average day look like for you?](#)
- [When finishing a project, how do you decide when to stop tweaking elements for the final render?](#)
- [What has been the most significant change to your life, since leaving Corridor Digital?](#)
- [What is the single most inspiring](#)

Don't miss another article

Your email

Next article

[Loacher Films - Youtube](#)

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Home
My Network
Jobs
Messaging
Notifications ¹⁵
Me


Winteryear Studios...
 Santa Clarita, California
 + Experience
 Unlock Premium tools & insights
 Try Premium for \$0
 Connections
 Grow your network


Rokoko
 17,522 followers
 2yr • 
+ Follow

"One of the coolest parts for me in this process has been the moment where I was actually able to play back all my motion capture data in real-time in Blender and see the characters moving around acting out the performance that I had done with the motion capture suit"

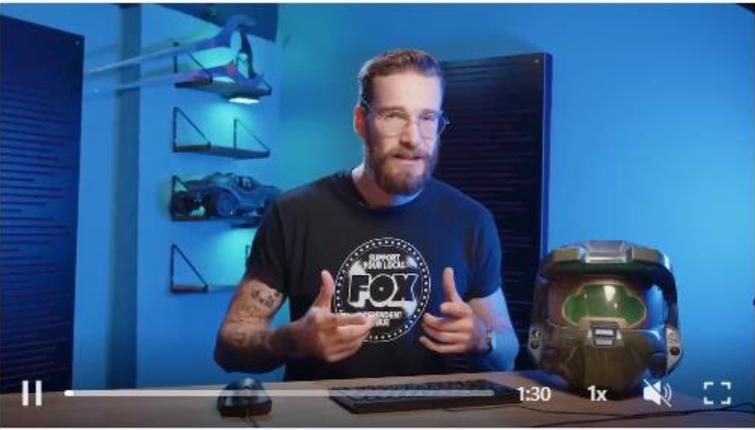
One of the Corridor Digital's OGs, Fenner Rockliffe, breaks down his use of our #mocap for a #halo-inspired Blender project

Fenner isn't just a talented creator - he's a yet another example of how access to affordable technology can empower indie creators to compete with million-dollar budgets

With in-game assets, mocap data, and some serious VFX magic, he is able to bring his vision to life with a Halo story we all deserve 😊

Check out the whole episode here: <https://lnkd.in/e8MiGzTi>

[#rokoko](#) [#blender3d](#) [#VFX](#) [#motioncapture](#)



Corridor Digital's Fenner Rockliffe uses Rokoko mocap for his Halo-ins...

Wh
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facebook.com/watch/?v=566282637328080

Video Home Live Reels Saved Videos Following

Rokoko April 28, 2020 · 379 views

Without a doubt, Corridor Digital is the craziest and funniest production studio on YouTube. Did you spot the Rokoko Smartsuit Pro in their latest video? ** It got more than 2M views in just a few days!

This time Niko, Clint, and Nick were joined by ... See more

Like Comment Share

Loaded Questions

corrordigital.com/season/63

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Jakob had ONE SHOT to Save his Company | Loaded Questions #2

Still in Denmark, Jonah finds himself with Jakob Balslev, Founder & CEO of Rokoko, for some Loaded Questions, coffee, and conversation. 2 years ago

A Facebook Post Changed Nick's Life | Loaded Questions #1

Jonah finds himself in Denmark with Nick Laurant, director, creator, and Showrunner of the Corridor Crew, for some loaded questions and how responding to one Facebook post changed Nick's life. 2 years ago

Loaded Questions

Jonah embarks on a new series to reveal the mindset of professional creators. 2 years ago



EP#227 | Don't Take Headlines at Face Value

Description **Transcript**

1:47

I filmed the Rococo brand integration yesterday.

Yeah, I was going to say we just did a Rococo.

Now I got a whole thing, so let me read the headline.

Rococo mocap hit with federal fraud lawsuit Solo dev takes on Reed Smith's 1300 lawyer Army alone with forensic evidence alleging company lied to users, bricks devices on purpose and stole users intellectual property to build a \$250 million plus shadow empire.

2:12

Wow, what a headline.

Not manipulative at all.

I.

Didn't I didn't look into it at all, but just from like I I read a tiny bit about it.

I was like, is this is this legit?

I don't I this feels SUS.

So here's the let me before we even get talk about it.

That's a crazy headline.



EP#227 | Don't Take Headlines at Face Value

Description **Transcript**

3:04

Because as again, I just filmed the brand deal for these guys.

Like are we going to have to like, you know, are we, are we going to be going through the comments again?

And we're like, how dare you work with those guys again?

And I'm like, bro, my only issues with them are that sometimes, like the quality of the mocap data, you know, like, that's as deep as it goes.

3:22

But you know, other than that.

But I was like, OK, as someone who literally is that close to it, I was like, I gotta figure this out.

Like, what's, what's the deal?

And it's crazy seeing the comments in these threads because everyone's just like, Oh my God, I didn't know this.

What a scummy company.

3:38

It's like, I was just about to buy a suit.

Glad I read this first.



EP#227 | Don't Take Headlines at Face Value

Description Transcript

Oh.

Really everyone is everyone is like doing the whole like holding their nose going like, oh, I would never want to be associated with such a, you know, company like that.

So I was like, this is this is unbelievable, like as if this is true.

3:56

This is crazy.

First off, the guy who posted all of these links is the plaintiff.

So the guy who made every subreddit post in all these different channels is the guy who is actually suing Rocco?

Yeah.

So the headline that I just read you was written by the person who has beef with Rocco and is trying to sue them.

4:15

At what point does it go to like slander or libel or whatever?

Well, in a lot of.

Ways it's on its way there right now.



EP#227 | Don't Take Headlines at Face Value

Description Transcript

He said, Oh, I was just about to buy one of those suits now.

I didn't know they're such a crappy company.

He's like, this is A1 headline posted by the guy who has the suit and has the evidence, quote UN quote on his website, which we will get into in a moment.

5:32

I'm like, wait a minute.

I think those are bot comments.

I think that's him using alt accounts just to like bump up the drama and his threads because I mean, many people speculation.

It is speculation, but The thing is like.

One's an 8 year old account.

5:51

I don't know a lot.

Of them are.

I'm sure some people get swept up in it, but a lot of them are like weird.

Just like 2 random words and numbers afterwards you know the default like phrases you get.

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EP#227 | Don't Take Headlines at Face Value

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EP#227 | Don't Take Headlines at Face Value

Description Transcript

It's so easy to do that, but The thing is like like Sam said, the guy who's filed the suit by the way, so he has all the evidence listed on his site and I wouldn't took a look actually.

And it's one of those weird things was like a single person just making mountains and mountains of data and text.

6:27

There is 2 lawsuits, a state lawsuit and a federal lawsuit in the state.

Lawsuit was not accepted.

Yeah, not even accepted.

Yeah.

OK.

And so now he's in the federal lawsuit and the federal lawsuit has basically gone into the system and he has a list of all the steps he's done.

And so he basically got it into the court system and then wrote this headline saying Rococo hit with.

6:47

And like, for example, Rococo hires a law firm.

That law firm has 1300 lawyers.



EP#227 | Don't Take Headlines at Face Value

Description

Transcript

7:29

So it's like, what the hell do you think they're doing with the data?

Do you think they're jerking off to your mocap data or something?

They're gonna, they're gonna, they're gonna sell it to James Cameron and put it in Avatar 3.

It's like, no, like it's literally just random anyways.

7:46

Jesus Christ.

So The funny thing though, anyways, the big, I'm just really sad that like so many people like kind of like fell for the bait because of the frankly very impressive and well written attention grabbing headline.

Like I think 99% of this guy's case is in the headline that he's written for himself.

8:07

Because everything after that, once you actually like start to critically think about it, falls apart pretty quickly.

It reminds me of a separate thing going on right now with a friend of mine who directed a movie called Together We Can Got.

We can talk about that in a minute.



EP#227 | Don't Take Headlines at Face Value

Description **Transcript**

The one thing that was really funny was the only thing, I mean, other than all the other stuff.

10:02

But the last thing is they said he, he said he hired a private investigator.

So this is the difference between like, oh, some guy with a bone to pick and someone who's unhinged.

This guy's actually, this guy's actually unhinged.

Like, I don't know what's wrong with him, but I think he's might be a little crazy because he said he, in his evidence, he said he hired private investigators to check out where Rococo's headquarters was and found that it was a, quote, 400 square foot empty office in a basement with no one there.

10:33

And I'm like, hold on.

We have a video he shot.

Yeah, it's like an interview on the website.

Loaded questions, Nick.

And Jonah went to their headquarters.

And filmed an interview like like.