

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
19 91361

20 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: FALSE
STATEMENTS TO COURT**

21 **DECLARATION OF MATTHEW R. WALSH ISO MOTION FOR**
22 **SANCTIONS RE: FALSE STATEMENTS TO COURT**
23

24 I, **Matthew R. Walsh**, declare as follows:
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1 I am the Plaintiff in this action. I have personal knowledge of the facts set forth
2 herein and, if called as a witness, could and would testify competently thereto. This
3 declaration is a continuation of the motion made for brevity and judicial economy.
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6 Some (but not all) of the many false statements Defendant and Counsel have made
7 upon this Court include:
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11 **a) “Plaintiff has not provided any evidence confirming that such a copyright**
12 **exists.”** Plaintiff had in fact, and had reiterated it in Dkt #57 stating “U.S.
13 **Copyright #14,954,598,732”**
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16 **b) “Rokoko is a Delaware corporation with its principal place of business in**
17 **Denmark;”** Through vast sums of evidence, this was proven to be false.
18 Defendant may be incorporated in Delaware, but they are a California
19 business with a principal place of business in California.
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23 **c) “Second, Plaintiff did not meet and confer with counsel for Rokoko in**
24 **advance of filing this ex parte as required under Local Rule 7-3”.** Plaintiff
25 notified Defendant prior by e-mail, during the 7-3 conference via voice and
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1 by e-mail afterwards as well.
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4 **d) “The Complaint consists of fabricated and fanciful allegations that at
5 bottom take issue with products that Plaintiff purchased from Defendant.”**

6 Defendant has shown clearly they did nothing to authenticate the claims or
7 evidence, did not submit them to an expert for interpretation and that they,
8 themselves do not possess any of the technical capacity or credentials to do
9 so. Further, nothing was fabricated and all was authenticated under penalty
10 of perjury – which Plaintiff takes *extremely* seriously.
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15 **e) “This lawsuit was filed by Matthew R. Walsh (“Plaintiff”) and is just the
16 latest event in a long-standing harassment campaign against Defendant.”**

17 Plaintiff has never “harassed” Defendant in any possible way beyond
18 communications to get parts, repair or replacement. Defendant may not wish
19 to be in Court but they had over 47 chances to avoid it. Suing a party is not
20 harassment.
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25 **f) “Due to the short deadline for Defendant to file a responsive pleading to
26 the Complaint, which is currently due on June 19, 2025”.** Defendant made
27 these false statements to the Court as a sheer display of judicial estoppel. To
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1 gain an unfair advantage of more time even though Defendant first received
2 the Complaint on April 17, 2025. Further, Defendant’s explicit email to
3 Plaintiff as well as DocuSign records confirm Counsel was procured on May
4 7, 2025 whereas the Complaint was filed on May 12, 2025. The deadline
5 is/has always been 30 days for all parties; they just do not wish the rules to
6 apply to them.
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11 **g) “The Denmark office is approximately 886.4 square meters with a 62**
12 **square meter basement.”** This is a false statement. 886.4 square meters is
13 nearly 10,000 square feet. Neither the entire basement “HQ” building itself
14 (1,081 sq/ft), nor the later described “real HQ office” building behind it
15 (1,940.57 sq/ft) or even with all of the neighboring buildings combined are
16 anywhere near that large as proven by Google maps. Certainly insufficient to
17 house “30 employees” (Exhibit 5)
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22 **h) “Executed this 28th day of July, 2025, in Copenhagen, Denmark”** This
23 was a false statement as DocuSign records and IP traces show Mikkel
24 Overby was actually at his home in Tranbjerg (~300km / 4hrs away) when
25 he signed it. The issue here is that his sworn statements are the only
26 evidence presented for their Copenhagen Nerve Center argument. He lied
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1 about where it was signed just as he lied about the content within it. (Exhibit
2 5)
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5 **i) [Mikkel Overby] “I am CFO and COO for Rokoko Electronics, Inc.**
6 **(“Rokoko”), and I have held these positions since April 2016.”** This is a
7 false statement designed to convince the Court that the nerve center was in
8 Denmark in order to qualify for diversity jurisdiction Jakob Balslev filed
9 corporate documents which still presently list him as the CEO, CFO and
10 Secretary. (Exhibit 17)
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15 **j) “Within the last year, Rokoko transitioned from leasing space in a co-**
16 **working office in San Francisco, California to a completely virtual office.”**
17 This is a false statement since Defendant has owned property at 44 Tehama
18 St. since 2016, in which the co-working office *leases* space *from* them.
19 (Exhibit 6)
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23 **k) “None of Rokoko’s executives reside in California.”** Through vast
24 evidence, this was shown to be false. Jakob Balslev lists San Francisco still
25 today on all social media and LinkedIn profiles, he has a \$2M luxury
26 apartment at 4140 Cesar Chavez St. #50 in San Francisco in which the
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1 Company was registered to prior to changing it to a new registered agent.
2 Further, Sam Lazarus their Creative Director and Stefano Corazza (a top
3 board member) all live in San Francisco.
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7 l) ***“Rokoko’s principal place of business is located at Sankt Gertruds
8 Stræde 10, 1129 København, Denmark, from where Rokoko’s senior
9 executives—including myself— direct, control, and coordinate the
10 company’s primary business activities on a day-today basis” --- “The
11 office in Denmark houses approximately 30 employees, including
12 Rokoko’s Founder & CEO, myself, and other senior level executives.”***
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15 Proven to be false as IP address traces show Mikkel Overby lives and
16 conducts business 300km or 4 hours away from the HQ; making a daily
17 commute entirely impossible (Exhibit 8). Additionally the staff count has
18 been proven false through private investigator research showing the location
19 closed throughout the week except for one person arriving on bicycle to
20 check the mail and go into the unit for ten minutes mid day. (Exhibit 9)
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25 m) [The basement HQ] ***“It is the center of all management decisions,
26 direction, control, and coordination for Rokoko.”*** Proven to be false
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1 through the aforementioned evidence and statements.
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4 **n) “That additional attorneys have been included in signature blocks**
5 **indicating that pro hac petitions were pending”** This statement is false as
6 you have to actually apply for something and begin the process in order for
7 it to be pending. The legal definition of the word is: “*Begun, but not yet*
8 *completed ; unsettled; undetermined ; in process of settlement or*
9 *adjustment. Thus, an action or suit is said to be “pending” from its*
10 *inception until the rendition of final judgment. Wentworth v. Farmington, 48*
11 *N. H. 210; Mauney v. Pemberton, 75 N. C. 221; Ex parte Munford, 57 Mo.*
12 *603.”*
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18 **o) “Contrary to Plaintiff’s contentions, a Reed Smith attorney licensed in**
19 **California has filed each document in this action.”** This was a half-falsity
20 intended as a red herring to the Court. Plaintiff never argued that a licensed
21 attorney didn’t file the documents. Plaintiff does not care who clicked
22 Submit. Unauthorized practice of law claims are directed towards forging
23 signatures and authoring documents by those with no legal capacity to do so.
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1 p) ***“While Plaintiff attempts to paint Rokoko’s Copenhagen office as a 400***
2 ***square feet “abandoned and gate-secured basement cellar” (Mot., 18:340-***
3 ***352), the facts show anything but. In truth, approximately 30 employees***
4 ***are based out of Rokoko’s Copenhagen office, which is approximately 86.4***
5 ***square meters with a 62 square meter basement.”*** This statement is clearly
6 false as it was later contradicted with a 10x increase in square meter area by
7 Defendant. Private investigator photographs clearly show the basement
8 cellar is their office (Exhibit 9).
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13 q) ***“More specifically, Rokoko’s key executive officers, including its Founder***
14 ***& CEO and its CFO/COO, all reside in Copenhagen and conduct the***
15 ***majority of their general operations from there.”*** Evidence had shown this
16 to be false. Mikkel Overby lives in or around Tranbjerg (~300km / 4hrs
17 away). Jakob Balslev’s IP addresses on many DocuSign filings too point to
18 Tranbjerg. Other key executives IP addresses point to San Francisco, Los
19 Angeles, Fyn (an island in Denmark) and Germany. Essentially, less than
20 10% of DocuSign records appear to have originated in Copenhagen. (Exhibit
21 8)
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1 r) ***“Plaintiff’s Motion to Strike Rokoko Electronics’ (“Rokoko”) removal to***
2 ***this Court does nothing to challenge Rokoko’s state of incorporation***
3 ***(Delaware), nor its principal place of business (Copenhagen, Denmark)”***.

4 This is a false statement unless Defendant had not even read the Motion to
5 Strike.
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9 s) ***“This ex parte application is also improper under Local Rule 7-19.***
10 ***Plaintiff made no attempt to inform Rokoko of this application. The meet***
11 ***and confer on June 26, 2025 only pertained to Rokoko’s Motion to***
12 ***Dismiss and Plaintiff’s Motion to Strike Rokoko’s removal”***. This was
13 false as Defendant was notified by e-mail prior; during and after the
14 meeting. (Exhibit 10)
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19 t) ***“has incorrectly accused Rokoko of exceeding the word count.”*** Counsel
20 expected the Court and Plaintiff to accept that they provided exactly 6,999
21 words. One word below the 7,000 limit to file. This was proven to be
22 incorrect through multiple AI and word processor word counting measures.
23 The total was well above 14,600 words (Exhibit 11). Counsel purposely
24 overinflated the word count believing if they did so – Plaintiff could not
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1 possibly answer it.

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4 **u)** *“Moreover, Plaintiff never met and conferred with counsel for Rokoko*
5 *regarding this requested relief”*. This was proven false through phone
6 records. Counsel – at best -- refused on a regular basis to engage in 7-3
7 conferences. (Exhibit 2)

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11 **v)** Defendant’s stated to the Court in (Dkt #61, p19) *“these are merely*
12 *conclusory allegations”* while going into detail on each point to convince
13 the Court Plaintiff was inventing claims:
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15 **i)** *“Allegations that Rokoko “claims to have 80 employees yet their*
16 *financial reports state only 45 as of 2023”* – a statement which Overby
17 would later admit was true (Exhibit 19)

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19 **ii)** *“Allegations that Rokoko changed its name to avoid confusion”* – A
20 statement Overby personally stated was true. (Exhibit 20)

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22 **iii)** *“Allegations that Rokoko’s Copenhagen office is a “basement with no*
23 *visible loading access, no apparent infrastructure for servers or*
24 *production equipment, and is located behind a locked gate”* – A
25 statement shown to be false in the Complaint and later in (Dkt #49, SET
26 1) as private investigator photos clearly show the same. (Exhibit 9)
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1 iv) Beyond these examples, the entirety of Defendant’s Motion Dismiss (Dkt
2 #61) is no more honest than it is compliant with Local Rules.

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5 w) ***“Plaintiff’s motion to strike was filed on July 3, 2025 without any hearing***
6 ***date set, as is required, and is therefore procedurally deficient”***. Possibly a
7 statement of ignorance, however, provably false and incorrect as Plaintiff
8 was filing through EDSS which as Counsel knows, does not allow hearing
9 reservations like CM/ECF does.
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14 There are greater than twenty additional false statements; but for brevity and
15 judicial economy, have no need to be addressed any further here.

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

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21 Executed on September, 15 2025, in Santa Clarita, California.

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25 Matthew R. Walsh
26 Plaintiff in pro per
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