

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: October 20, 2025
Hearing time: 1:30PM

SUPPLEMENTAL DECLARATION
OF PLAINTIFF MATTHEW R.
WALSH RE: EXPERT WITNESS

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21 **DECLARATION OF PLAINTIFF**
22 **MATTHEW R. WALSH RE: EXPERT WITNESS**
23

24 I, **Matthew R. Walsh**, declare as follows:
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27 **I. INTRODUCTION**
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- 1 1. I am the Plaintiff in this action. I also submit this declaration to establish my
2 qualifications as an expert in software system architecture design and
3 engineering, embedded systems design, computer security, and forensic
4 analysis.
- 5
6 2. I have more than twenty-three (23) years of professional experience in
7 designing, developing, reverse engineering, and decompiling complex
8 software systems. My expertise has been and is relied upon by government
9 agencies, public and private corporations and law enforcement entities.
- 10
11 3. The opinions and forensic analyses I provide in this matter are based on my
12 professional experience and accepted methodologies in the field of computer
13 science and information security generally known to be industry standard.
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17 **II. EDUCATION AND EARLY PROFESSIONAL HISTORY**

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19 4. At age fourteen, I was a published and recognized software engineer for
20 computer security tools I created which were used worldwide and
21 recognized by Microsoft, Symantec, Sophos, McAfee, MegaSecurity and
22 many others; of which are *still* listed online today.
- 23
24 5. At age sixteen, I received early dual enrollment in college, where I
25 maintained a 4.0 GPA in C++ business application development and
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1 computer science while serving as Assistant System Administrator and
2 Network Security Advisor for the Genesee Intermediate School District.

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4 6. During this period, I identified and remediated critical security
5 vulnerabilities, including Unicode directory traversal exploits, Unix shadow
6 password exposure, and Windows SAM enumeration exploits which at the
7 time were zero-day attacks.
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10 7. At the same age (16), I entered into professional contracts to design and
11 develop 3D rendering engines and CAD drawing tools, establishing myself
12 as a professional software engineer before reaching adulthood. This
13 professional establishment has continued forward well into today.
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16 **III. PROFESSIONAL EXPERIENCE**
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18 7. Since 2009, I have developed and maintained enterprise-scale software
19 systems that are mandated for legal compliance in multiple U.S. states.
20 These systems are currently deployed in recycling and scrap metal
21 operations across the nation and in four countries. Since 2017 I have built
22 entirely proprietary artificial intelligence systems used and endorsed by Los
23 Angeles County and are relied upon daily for regulatory compliance and
24 operational resource continuity.
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1 8. I develop advanced systems for electronics recycling as well as metallurgy
2 (chemical analysis, planning and production of the and purification of
3 metals) which interact with XRF technologies and smelting centers.
4

5 9. I have developed law-enforcement software for the Department of
6 Homeland Security and had consulted for their development team in solving
7 advanced problems in which their staff could not. My systems, including
8 artificial intelligence and zero-UI architectures, remain in use under
9 government contracts.
10

11 10.I have developed software used by some of the worlds largest Corporations
12 such as Trafigura Ag, Mercedes-Benz, Daimler Chrysler, BMW, Ford,
13 Audi/Lamborghini, etc.
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15 11.I have also been retained as a consultant for law enforcement agencies,
16 working in a forensic capacity to analyze data, reconstruct events, and
17 support criminal investigations including digital fraud of multi-million dollar
18 monetary theft operations nationwide.
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23 **IV. TECHNICAL EXPERTISE**
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25 10.I am fluent in more than twenty (20) programming and scripting languages,
26 including C, C++, C#, oo-PHP, Python, XAML, VB.NET, Ue4/Ue5
27 blueprints, HTML/CSS, JavaScript, varying flavors of SQL, among many
28

1 others. I have also authored proprietary scripting languages that are in
2 commercial use worldwide.
3

4 11. My expertise in creating advanced systems inherently extends to reverse
5 engineering software binaries, decompiling source code, analyzing network
6 communication protocols, and reconstructing digital artifacts.
7

8 12. My technical work has also received recognition outside of traditional
9 engineering and legal contexts. Proprietary proof-of-concept security code I
10 authored was featured in the official music video “Paralyze” by the Sony-
11 signed industrial metal band 3TEETH (timestamp 2:39–3:22) resulting in
12 millions of impressions. This cultural reference underscores that my research
13 and technical output have had visibility and impact beyond purely technical
14 communities.
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18 13. I have vast experience in developing commercial grade hardware electronics
19 and operating software across a multitude of various microcontroller based
20 platforms (ESP32, Arduino, RPi, Basic Stamp, etc.); not dissimilar to that of
21 Defendant’s products; and so my experience aligns entirely with a strict
22 understanding of their technologies, communication and development
23 stacks.
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27 **V. RECOGNITION AND PRIOR EXPERT TESTIMONY**
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1 13.I was ranked in the top 1% of software engineers worldwide on
2 StackOverflow in select categories, the largest technical knowledge
3 exchange platform, reflecting peer-verified recognition of my expertise.
4

5 14.I have both provided evidentiary packages and testified as an expert witness
6 in litigation involving allegations of unauthorized computer access including
7 but not limited to a high profile Michigan computer hacking case (Fay
8 Latture v. Emmerling, Reed, Friefeld, and Keyes).
9

10 15.My professional reputation has resulted in worldwide private and
11 government contracts, with clients relying on my expertise in both the
12 development and forensic investigation of complex systems.
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16 **VI. FORENSIC METHODOLOGY**
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- 18 • My forensic methodology incorporates the following:
- 19 • Extraction and preservation of metadata from digital files, including
20 timestamps, object structures, and authorship records.
- 21 • Validation of digital signatures and detection of falsified or ghostwritten
22 documents through comparative analysis.
- 23 • Reverse engineering of communication layers and protocols to identify
24 originating locations, unauthorized access, tampering, or misrepresentation.
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- Decompilation of binary executables, reflection and deconstruction of MSIL compiled assemblies, monitoring and reverse engineering communication protocols and their data buckets and containers.
- Cross-referencing forensic artifacts with external records to ensure consistency and authenticity.
- These methodologies have been applied consistently in my professional work for both government entities and private clients, and they form the basis of my analyses in this case.

VII. RELEVANCE TO THIS MATTER

- **Metadata:** In this action, my expertise directly informs the forensic evidence before the Court. Specifically, I have identified metadata irregularities and digital signatures that demonstrate documents were ghostwritten, prepared and filed by non-admitted counsel, contrary to sworn declarations.
- **Misappropriation:** I have used industry standard methods to demonstrate the automated exfiltration and misappropriation of my intellectual property by Defendant.

1 • **Destruction of Property / Intentional Bricking / Planned obsolescence:**

2 Using the same methods as above, I have demonstrated that Defendant
3
4 destroyed my personal property through electronic means intentionally.

5 • My ability to deconstruct and authenticate these digital records derives from
6
7 the same technical competencies that have been recognized by government
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9 agencies, industry leaders, and prior courts.

10 • The methods I have employed here are accepted in the fields of computer
11 forensics and information security, and they are the same methods I have
12 used in both private-sector and government engagements. They and myself
13 pass the Daubert standard for qualification, reliability and relevancy.
14

16 **VIII. CONCLUSION**

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18 Based on my professional background, government and private contracts,
19 prior expert testimony, forensic methodology and the simple fact that I do not draft
20 any legal argument without first having verified evidence. I am fully qualified to
21 provide expert opinions in this matter.
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24
25 I declare under penalty of perjury under the laws of the United States of America
26 that the foregoing is true and correct.
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Executed this 18 of September, 2025 in Santa Clarita, California

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

Matthew R. Walsh
Plaintiff In Pro Per

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