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10 *Attorneys for Defendant,*
Rokoko Electronics, *et al.*

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MATTHEW R. WALSH

15 Plaintiff,

16 vs.

17 ROKOKO ELECTRONICS, and
DOES 1 through 50, inclusive,

18 Defendant.
19

Case No.: 2:25-cv-05340-ODW-RAO

[Assigned to Hon. Otis D. Wright, II,
Courtroom 5D]

**DECLARATION OF KATHERINE
ELLENA IN SUPPORT OF
DEFENDANT ROKOKO
ELECTRONICS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
SANCTIONS**

Date: October 20, 2025
Time: 1:30 PM
Place: Dept. 5D

[Concurrently filed with Defendant's
Opposition to Plaintiff's Motion for
Sanctions; Declaration of Emily Graue]

State Court Action Filed: May 12, 2025
Removal Date: June 12, 2025
Trial Date: None

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DECLARATION OF KATHERINE ELLENA

I, Katherine Ellena, declare:

1. I am an attorney with Reed Smith LLP and counsel for Defendant Rokoko Electronics (“Rokoko”). 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 Rokoko’s Opposition to Plaintiff’s Motion for Sanctions (the “Motion”).

3. I am an attorney who has been licensed to practice in the State of California since December 5, 2018. I was admitted to practice in the Central District of California on or about January 28, 2019.

4. I prepared and filed the documents submitted in support of Rokoko’s removal of this action to this Court.

5. In advance of filing Rokoko’s motion to dismiss Plaintiff’s complaint, I engaged in several efforts to meet and confer with Plaintiff regarding the same, which are further detailed in my declaration in support of Rokoko’s motion to dismiss. On June 19, 2025, I provided Plaintiff with an email setting forth the bases for Rokoko’s motion to dismiss. Plaintiff responded to my email by stating “Best of luck arguing that in front of a judge.”

6. On June 25, 2025, Plaintiff and I exchanged various emails regarding a further meet and confer about Rokoko’s motion to dismiss. I informed Plaintiff that I believed I had satisfied any meet and confer obligation in light of Plaintiff’s unwillingness to do the same but that I was happy to resume the discussion. In response, Plaintiff stated “Ah, your hearsay statement again.... Inventing things that didn’t happen is not dispute resolution, but, it seems par from the course for you people.” Attached as **Exhibit A** is a true and correct copy of my email exchange with Plaintiff.

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1 7. As a further attempt to meet and confer, I engaged in a June 26, 2025
2 telephone call with Plaintiff. Emily Graue, an attorney at Reed Smith, was also present
3 on that call but did not speak for the remainder of the call after she stated her presence.

4 8. During that call, I discussed each cause of action asserted in Plaintiff’s
5 complaint and the legal basis for Rokoko’s motion to dismiss. I also listened to
6 Plaintiff’s position as to each of his claims and reviewed the various statutes that he
7 stated he believed to be applicable while we were on the call. I further explained that
8 the Court is limited to what is alleged in the four corners of the complaint and that
9 Plaintiff had not adequately pled claims for relief.

10 9. During that call, Plaintiff became increasingly confrontational and accused
11 me of stonewalling him.

12 10. On Friday, July 4, 2025, a federal holiday, Plaintiff requested a meet and
13 confer regarding a forthcoming “motion to strike” Rokoko’s removal to this Court and
14 stated that he had transcribed our June 26, 2025 telephone conference. On Monday,
15 July 7, 2025, I responded that I was available for a meet and confer but that I had not
16 consented to an unknown recording of our meet and confer conversation. Plaintiff
17 responded that he no longer wanted to meet and confer. Attached as **Exhibit B** is a true
18 and correct copy of our email exchange.

19 11. Since August 6, 2025, Plaintiff in *pro per* has attempted to issue
20 subpoenas to various third parties without a signature of the Clerk or a licensed attorney.
21 Attached as **Exhibits C through K** are true and correct copies of those subpoenas.

22 12. When I asked Plaintiff to withdraw the subpoenas, Plaintiff refused.

23 I declare under penalty of perjury under the laws of the State of California and
24 the United States that the foregoing is true and correct and that this declaration was
25 executed on September 29, 2025, in Los Angeles, California.

26
27 /s/ Katherine J. Ellena
Katherine J. Ellena

28

EXHIBIT A

From: matthew@winteryear.com
To: [Ellena, Katherine J.](#); [Valencia, Heather R.](#)
Cc: [Galibois, Michael B.](#); [Graue, Emily H.](#)
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al
Date: Wednesday, June 25, 2025 7:26:24 PM

External E-Mail - FROM matthew@winteryear.com



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

If you feel like you have met your obligations under meet and confer, please provide your phone records and show me where it lasts more than 1 minute. Show me e-mails where you actually try to resolve litigation prior to filing motions. Show me where you provide 7 days minimum before filing. The point of meet and confer for 7 days isn't to say "im filing this motion, do you oppose" and hanging up. You're SUPPOSED to try and work things out prior to filing to not waste the courts time.

Bottom line – diversity of citizenship is dead. None of your clients are American citizens. This doesn't belong in Federal Court and you know it. The judge provided the case law, on the record. You should withdraw your removal before it's struck and you lose your tolling protections back in State.

Your goal should be resolution, not litigation sleight of hand.
Call me after 1pm, that will start your 7 day clock.

From: Ellena, Katherine J.
Sent: Wednesday, June 25, 2025 7:21 PM
To: matthew@winteryear.com; Valencia, Heather R.
Cc: Galibois, Michael B. ; Graue, Emily H.
Subject: Re: Matthew R. Walsh v. Rokoko Electronics et al
Matthew -

We attempted to meet and confer with you and you were not willing to engage. You have also stated that you will oppose any motion we file. We have met our meet and confer obligations but, as I stated, I am happy to resume the meet and confer discussion with you. Please provide your availability tomorrow.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Wednesday, June 25, 2025 7:12 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

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

It's not what I would like.
It's your obligation under 7-3.

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Wednesday, June 25, 2025 7:10 PM
To: matthew@winteryear.com; Valencia, Heather R. <HValencia@ReedSmith.com>

Cc: Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>

Subject: Re: Matthew R. Walsh v. Rokoko Electronics et al
Matthew - I explained in detail the basis for our motion to dismiss last week and your response was “good luck arguing that to a judge”. If you would like to meet and confer further, I am happy to have a call tomorrow. Please let me know your availability.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Wednesday, June 25, 2025 7:06:28 PM
To: Valencia, Heather R. <HValencia@ReedSmith.com>
Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al

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

Counsel,

I saw Defendant’s Notice of Withdrawal of the Motion to Dismiss.

Would you like to schedule a proper meet and confer regarding any future motion — ideally 7+ days in advance this time — so we can avoid repeating the same procedural issues?

Have a good night.
Matthew R. Walsh

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, June 20, 2025 7:07 PM
To: 'Valencia, Heather R.' <HValencia@ReedSmith.com>
Cc: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>; 'Graue, Emily H.' <EGraue@reedsmith.com>
Subject: RE: Matthew R. Walsh v. Rokoko Electronics et al
Citizenship diversity is DOA, the judge outlined the exact caselaw precisely:

“[I]n order to be a citizen of a State within the meaning of the diversity statute, a natural person must both be a citizen of the United States and be domiciled within the State.” — Newman-Green, Inc. v. Alfonzo-Larrain, 490 U.S. 826, 828 (1989).

This is falling back to state court.

I get you are preserving yourself from Default, but I’ll only file oppositions now close to the deadline of those motions as to not waste my time.

Additionally, I am amending my motion to shorten time to instead hear the motion to strike your removal.

From: Valencia, Heather R. <HValencia@ReedSmith.com>
Sent: Friday, June 20, 2025 5:54 PM
To: matthew@winteryear.com
Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>
Subject: Matthew R. Walsh v. Rokoko Electronics et al

Good afternoon,

Please see the attached documents.

DEFENDANT ROKOKO ELECTRONICS’ NOTICE OF MOTION TO DISMISS AND MOTON TO DISMISS COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT ROKOKO ELECTRONICS'
MOTION TO DISMISS COMPLAINT
[PROPOSED] ORDER GRANTING DEFENDANT ROKOKO ELECTRONICS' MOTION TO DISMISS
COMPLAINT**

Thank you,

Heather Valencia

Assistant to Katherine J. Ellena

Reed Smith LLP

515 South Flower Street, Suite 4300

Los Angeles, CA 90071-1514

Direct 213.457.6458 | hvalencia@reedsmith.com

Main 213.457.8000 | Fax 213.457.8080

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

RSUSv12021

EXHIBIT B

From: matthew@winteryear.com
To: [Ellena, Katherine J.](#); [Paredes, Valerie S.](#)
Cc: [Valencia, Heather R.](#); [Galibois, Michael B.](#); [Graue, Emily H.](#)
Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case
Date: Tuesday, July 8, 2025 11:22:40 AM

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



What a strange conclusion to jump to.

I don't believe I ever stated that I recorded the only meet and confer that has occurred — and now you're threatening me with Penal Codes?

Disregard the meet and confer request. I have no interest in repeating the last experience.

Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Tuesday, July 8, 2025 8:59 AM
To: matthew@winteryear.com; [Paredes, Valerie S. <VParedes@reedsmith.com>](mailto:VParedes@reedsmith.com)
Cc: [Valencia, Heather R. <HValencia@ReedSmith.com>](mailto:HValencia@ReedSmith.com); Galibois, Michael B. <MGalibois@reedsmith.com>; [Graue, Emily H. <EGraue@reedsmith.com>](mailto:EGraue@reedsmith.com)
Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

Mr. Walsh:

I inadvertently cited to the wrong Penal Code section in my email below. The correct Penal Code section is 632.

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

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 |
Reception: 213.457.8000 | Fax: 213.457.8080

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From: Ellena, Katherine J.

Sent: Monday, July 7, 2025 11:31 PM

To: matthew@winteryear.com; Paredes, Valerie S. <VParedes@reedsmith.com>

Cc: Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>

Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

Mr. Walsh:

While we disagree with the entirety of your July 4th email, a point-by-point back and forth with you would be fruitless and I decline to do so. That said, your insinuation that Reed Smith—or myself in particular—has been anything other than professional in our interactions is completely unfounded. I also never consented, nor will ever consent, to any recordings of our conversations. To the extent you have recorded any of our meet and confer conversations, including our call on June 26th, you have violated Penal Code § 625 and we expressly reserve all rights to seek all available statutory and civil remedies.

As for a meet and confer call to discuss any motion you intend to file in response to Rokoko's motion to dismiss, I am available this Wednesday or Thursday between 11 am and 3 pm. Please let me know what time works best for you.

Regards,

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

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 |
Reception: 213.457.8000 | Fax: 213.457.8080

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From: matthew@winteryear.com <matthew@winteryear.com>

Sent: Monday, July 7, 2025 8:45 PM

To: Paredes, Valerie S. <VParedes@reedsmith.com>

Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>

Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

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

Counsel,

I have not heard from you since 6/26.

I have requested meet and confer.

You have 24 hours to agree to a meet and confer call or I will be filing a Notice of Breakdown in Meet and Confer

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, July 7, 2025 11:52 AM
To: 'Paredes, Valerie S.' <VParedes@reedsmith.com>
Cc: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>
Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

My CM/ECF access was enabled today, so there will be less delays in filings. Accordingly, see the notice of lodging as filed.

Thank you.

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

As filed.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Sunday, July 6, 2025 12:13 PM
To: 'Paredes, Valerie S.' <VParedes@reedsmith.com>
Cc: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>
Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, July 4, 2025 4:46 PM
To: 'Paredes, Valerie S.' <VParedes@reedsmith.com>

Cc: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>

Subject: RE: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

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

1. You mislabeled the document so that word counts could not be ascertained, it was not compliant.
2. You violated 7-3 which required a substantial meeting on the merits 7 days prior to filing, you filed the same day.
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.
4. It is procedurally defective, and so dense, it cannot be responded to or opposed – which seems by design.
5. For other procedural defects.

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:

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

I expect professionalism, as you are required to do by your code of conduct.

That call was transcribed by the way. I am considering releasing it to the Court as further evidence towards sanctions.

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

Thank you,
Matthew R. Walsh

From: Paredes, Valerie S. <VParedes@reedsmith.com>

Sent: Thursday, June 26, 2025 6:14 PM

To: matthew@winteryear.com

Cc: Ellena, Katherine J. <KEllena@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>

Subject: Case 2:25-cv-05340-ODW-RAO Matthew R. Walsh v. Rokoko Electronics et al Motion to Dismiss Case

Mr. Walsh,

Attached please find courtesy copies of as-filed documents in connection with the above-entitled case.

Thank you,

Valerie S. Paredes
Executive Assistant

vparedes@reedsmith.com
D: +1 213.457.6443

Reed Smith
515 South Flower St.
Suite 4300
Los Angeles, CA 90071
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reedsmith.com

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RSUSv12021

EXHIBIT C

UNITED STATES DISTRICT COURT

for the

Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics

Defendant

Civil Action No.

2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Docusign

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: The full audit trail for Envelope ID 731C2183-C8A8-4B97-91B2-5D2D3EA4325E, including all metadata, IP addresses of sender and signer, timestamps, access logs, authentication records, and any associated records retained by DocuSign.

Table with 2 columns: Place (matthew@winteryear.com) and Date and Time (06/13/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/06/2025

CLERK OF COURT

OR

Handwritten signature of Matthew R. Walsh

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh, who issues or requests this subpoena, are: Matthew R. Walsh, in pro per, matthew@winteryear.com, 19197 Golden Valley Rd. #333, Santa Clarita, CA 91350

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT D

UNITED STATES DISTRICT COURT

for the

Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics

Defendant

Civil Action No.

2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Docusign

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: "All metadata including IP addresses, geolocation data (if available), device/browser fingerprints, and timestamps for any and all signatures executed by e-mail addresses jakob@docusign.com matias@docusign.com and mikkel@docusign.com — across all DocuSign envelopes from January 1, 2024 to present.

Table with 2 columns: Place (matthew@winteryear.com) and Date and Time (06/13/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/06/2025

CLERK OF COURT

OR

Handwritten signature of Matthew R. Walsh

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh, who issues or requests this subpoena, are: Matthew R. Walsh, in pro per, matthew@winteryear.com, 19197 Golden Valley Rd. #333, Santa Clarita, CA 91350

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT E

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: DocuSign, Inc.; c/o United Agent Group, Inc. 707 W. Main Avenue, #B1, Spokane, WA 99201

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All docuSign envelope audit trails including metadata including but not limited to Envelope Subject, IP address and location data of signers for the domains @rokoko.com and @rokocare.com and @cococare.io

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/27/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i)** is a party or a party's officer; or
- (ii)** is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i)** fails to allow a reasonable time to comply;
- (ii)** requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv)** subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii)** ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i)** expressly make the claim; and
- (ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT F

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: DocuSign, Inc.; c/o United Agent Group, Inc. 707 W. Main Avenue, #B1, Spokane, WA 99201

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All docuSign envelope audit trails, including metadata, IP address, location information and the 'subject' of the envelope for the following e-mails: jesstropp@gmail.com, projektmatias@gmail.com, mikkellucasoverby@gmail.com, Jakob.fisker@hotmail.com from January 1, 2022 to present.

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/27/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i)** is a party or a party's officer; or
- (ii)** is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i)** fails to allow a reasonable time to comply;
- (ii)** requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv)** subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i)** disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii)** ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i)** expressly make the claim; and
- (ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT G

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Trifork US Inc.;

To: c/o CANOPY Pacific Heights, 2193 Fillmore Street, San Francisco, CA 94115

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce in native format with metadata all agreements, payments, communications, or documents sufficient to show how Trifork US, Inc. (or its subsidiaries) and [Rokoko Electronics or Rokoko Care or CoCo Care] exchanged or used animation/mocap data, machine learning, or artificial intelligence from Jan. 1, 2020-present.

Place: Remit to: matthew@winteryear.com Date and Time: 09/27/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i)** is a party or a party's officer; or
- (ii)** is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i)** fails to allow a reasonable time to comply;
- (ii)** requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv)** subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii)** ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i)** expressly make the claim; and
- (ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT H

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

NAVER Z USA, INC. c/o PAUL KIM, 707 WILSHIRE BLVD., SUITE 4600, LOS ANGELES, CA 90017

To: (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce in native format with metadata all agreements, payments, communications, or documents sufficient to show how Naver Z USA, Inc. (or it's subsidiaries) and Rokoko Electronics exchanged or used animation/mocap data, machine learning, or artificial intelligence from Jan. 1, 2020-present.

Place: Remit to: matthew@winteryear.com Date and Time: 09/27/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT I

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Internet Archive, 300 Funston Avenue San Francisco, CA 94118

To:

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce a complete audit trail of changes for the page https://www.rokoko.com/studio-term-of-use from Jan 1, 2020 to present. Produce any and all communications in which any party has contacted you involving any removal, masking or de-indexing of this website. Produce any logs or information indicating the use of robots.txt, user-agent disallow, javascript content masking, custom HTTP header's including but not limited to x-archive-ignore-errors, HTTP response codes including but not limited to 404 or 410. The spirit of this subpoena is to detect and explain the sudden disappearance of this evidence mid-litigation (~May 2025). Include any such logs sufficient to show this.

Place: Remit to: matthew@winteryear.com Date and Time: 09/28/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Matthew R. Walsh Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT J

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Wikimedia Foundation

To: 1 Montgomery St., Suite 1600, San Francisco, CA 94104

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Produce all user account information (except the password) of Sharleenbrando123 including but not limited to e-mail address, phone number and IP address. If possible entire HTTP request headers during each post/edit/undo/removal or any other usage including but not limited to: HTTP_REFERER, User-Agent, Location information, Platform or other HTTP request header information. If the IP address matches any other Wikipedia users, please provide any such similar information as above if possible.

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/28/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/13/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT K

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Corridor Digital, LLC, C/O Jake Watson 2458 HUNTER STREET, STUDIO 4, LOS ANGELES, CA 90021

To: (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce all communications (Including but not limited to: e-mails, DM's, instant messages) from April 1, 2025 to present involving Corridor Digital (or any member, agent or affiliated persons) and/or Rokoko Electronics (or any member, agent or affiliated persons) regarding the active lawsuit, the Plaintiff Matthew R. Walsh or any communications regarding Corridor Cast EP #227. Further, produce all documents sufficient to corroborate the truthfulness of your each of your counterclaims and statements in EP #227 regarding the lawsuit and the Plaintiff. Additionally, produce documents sufficient to identify any and all financial payments to or from Rokoko from Jan 1, 2020 to present. Lastly, produce an uncut, unedited copy of EP #227 in mp3 format including any off-air commentary that may have been recorded.

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/30/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/15/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.