

# **EXHIBIT A**

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

**External E-Mail - FROM [matthew@winteryear.com](mailto:matthew@winteryear.com) <[matthew@winteryear.com](mailto:matthew@winteryear.com)>**

---

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

---

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

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

**External E-Mail - FROM** [matthew@winteryear.com](mailto:matthew@winteryear.com) <[matthew@winteryear.com](mailto: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](mailto:matthew@winteryear.com) <[matthew@winteryear.com](mailto:matthew@winteryear.com)>  
**Sent:** Friday, June 20, 2025 7:07 PM  
**To:** 'Valencia, Heather R.' <[HValencia@ReedSmith.com](mailto:HValencia@ReedSmith.com)>  
**Cc:** 'Ellena, Katherine J.' <[KEllena@reedsmith.com](mailto:KEllena@reedsmith.com)>; 'Galibois, Michael B.' <[MGalibois@reedsmith.com](mailto:MGalibois@reedsmith.com)>; 'Graue, Emily H.' <[EGraue@reedsmith.com](mailto: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](mailto:HValencia@ReedSmith.com)>  
**Sent:** Friday, June 20, 2025 5:54 PM  
**To:** [matthew@winteryear.com](mailto:matthew@winteryear.com)  
**Cc:** Ellena, Katherine J. <[KEllena@reedsmith.com](mailto:KEllena@reedsmith.com)>; Galibois, Michael B. <[MGalibois@reedsmith.com](mailto:MGalibois@reedsmith.com)>; Graue, Emily H. <[EGraue@reedsmith.com](mailto: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](mailto:hvalencia@reedsmith.com)

Main 213.457.8000 | Fax 213.457.8080

Please consider the environment before printing the contents of this email

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