

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

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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

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RSUSv12021