

1 MATTHEW R. WALSH  
2 19197 GOLDEN VALLEY RD #333  
3 SANTA CLARITA, CA 91387  
4 (661) 644-0012

5 Plaintiff In Pro Per,

6 **UNITED STATES DISTRICT COURT**  
7  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 MATTHEW R. WALSH  
10 19197 GOLDEN VALLEY RD #333  
11 SANTA CLARITA, CA 91387,

12 Plaintiff In Pro Per,

13 vs.

14 ROKOKO ELECTRONICS  
15 (AND DOES 1 THROUGH 50,  
16 INCLUSIVE)  
17 31416 AGOURA RD STE 118  
18 WESTLAKE VILLAGE, CA  
91361

19 Defendant

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

Before: Hon. Otis D. Wright II  
Courtroom 5D

Hearing date: November 10, 2025  
Hearing time: 1:30PM

**DECLARATION OF MATTHEW R.  
WALSH  
ISO MOTION FOR SANCTIONS  
RE: EVIDENTIARY PACKAGE**

20  
21 **DECLARATION OF MATTHEW R. WALSH**  
22 **ISO MOTION FOR SANCTIONS RE: EVIDENTIARY PACKAGE**  
23

24 I, Matthew R. Walsh, declare as follows:

25 I am the Plaintiff in this action. I have personal knowledge of the facts set forth  
26 herein and, if called as a witness, could and would testify competently thereto. All  
27

1 exhibits attached hereto are true and accurate copies of documents I have received  
2 or made.  
3

4 I declare under penalty of perjury under the laws of the United States of America  
5 that the foregoing is true and correct.  
6

7 Executed on October 10, 2025, in Santa Clarita, California.

8   
9

10 Matthew R. Walsh  
11  
12 Plaintiff in pro per  
13  
14

15  
16  
17 **TABLE OF CONTENTS OF EXHIBITS**

- 18
- 19 • **EXHIBIT 1** – Defendant’s Counsel admits Corridor Digital is a “business  
20 partner” after Corridor published a defamatory podcast episode about Plaintiff  
21 and the case; simultaneously while admitting “we are talking to him [Rokoko]  
22 right now” while live on air.
  - 23 • **EXHIBIT 2** – Defamatory statements about Plaintiff and the case show IP  
24 addresses belonging to, and tracing directly to Defendant. A third user  
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1 SharleenBrando123 appears to make legal conclusions and appeared making  
2 these statements the same day ReedSmith was hired.  
3

- 4 • **EXHIBIT 3** – Emails with Trifork. They claim first to have had no interactions  
5 with Defendants. Faced with contrary evidence, they ignore e-mails. Once  
6 Defendant’s letter admitting their business dealings was presented, they echoed  
7 Defendant’s Counsels words to avoid subpoena enforcement.  
8
- 9 • **EXHIBIT 4** – Naver-Z made service of the subpoenas impossible until a phone  
10 call and threats of a motion to compel / sanctions were presented to the lawfirm.  
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- 12 • **EXHIBIT 5** – DocuSign gave a compliance date to produce the documents.  
13 They indicated Counsel falsely told them a meet and confer over a motion to  
14 quash has occurred. They then echoed Counsel’s words to avoid subpoena  
15 enforcement. E-mails definitively show, no 37-1 meet and confer was  
16 scheduled or had occurred.  
17
- 18 • **EXHIBIT 6** – Defendant’s demand letter, filled with AI-fabricated caselaw.  
19
- 20 • **EXHIBIT 7** – Naver-Z USA counsel told Plaintiff nothing in possession  
21 concerning Rokoko, however, CC’ed their Counsel before doing so.  
22
- 23 • **EXHIBIT 8** – DocuSign showing Naver-Z CEO engaging with Defendant in  
24 business contracts  
25
- 26 • **EXHIBIT 9** – ESG report showing Naver-Z USA and Corp commingle  
27 disclosure and information  
28

- 1 • **EXHIBIT 10** – Corridor Digital certificate of non-service
- 2 • **EXHIBIT 11** - Plaintiff’s service by e-mail/instant message as an exception
- 3
- 4 • **EXHIBIT 12**– Defendant’s refusal to participate in 26(f) or 36-1 and Plaintiff’s
- 5 good faith attempts.
- 6
- 7 • **EXHIBIT 13** – Defendant openly states they will no longer meet and confer
- 8 with Plaintiff unless their unilateral demands are met.
- 9
- 10 • **EXHIBIT 14** – Defendant had received the clerk signed subpoenas on
- 11 September 26, 2025 but presented unsigned subpoenas to the Court instead days
- 12 later in order to damage Plaintiff’s credibility.
- 13
- 14 • **EXHIBIT 15**– All subpoenas cured with the clerk **prior** to Defense
- 15 intentionally presenting the Court with non-signed subpoenas.
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- 17 • **EXHIBIT 16** - Defendant’s Rule 11 safe harbor letter
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# EXHIBIT 1

1 Upon being confronted with evidence of their long-standing relationship, ReedSmith admits  
2 Rokoko and Corridor Digital are business partners and the terms of which are “confidential”.  
3 Further, they bolster these arguments with AI-fabricated caselaw.  
4

5  
6 Matthew R. Walsh  
7 September 25, 2025  
8 Page 2

ReedSmith

9 **A. Plaintiffs In Pro Per Cannot Issue Subpoenas Without Approval From The Clerk Of The Court Or A Licensed Attorney.**

10 Pursuant to Fed. R. Civ. P. 45(a)(3), “[t]he clerk must issue a subpoena, signed but otherwise in blank,  
11 to a party who requests it. That party must complete it before service. An attorney also may issue and sign  
12 a subpoena if the attorney is authorized to practice in the issuing court.” See also *Ekene v. Office L. Fowler*,  
2023 U.S. Dist. LEXIS 187409, at \*3 (C.D. Cal. April 13, 2023) (“Plaintiff, proceeding pro se, may only  
13 serve a subpoena issued by the Clerk of this Court.”); *McGee v. Cnty. of Riverside*, 2022 U.S. Dist. LEXIS  
193707, at \*2 (C.D. Cal. Oct. 21, 2022) (“If a pro se plaintiff needs to seek information from non-parties,  
14 this must be done through a subpoena issued by the Clerk and approved by the Court.”).

15 None of the Subpoenas were issued by the Clerk. Instead, you signed on the line clearly delineated  
16 “Attorney’s signature” and served them. You are not a licensed attorney, and this was completely  
17 improper. Accordingly, the Subpoenas are clearly defective on their face.

18 **B. The Subpoenas Seek Rokoko’s Confidential Commercial Information And Violate Individual Privacy Interests.**

19 Courts have broad discretion to quash or modify a subpoena that seeks the disclosure of “a trade secret  
20 or other confidential research, development, or commercial information.” Fed. R. Civ. P. 45(d)(3)(B)(i).  
21 The Subpoenas to Corridor, Naver Z, and Trifork must be withdrawn because they seek highly confidential  
22 information for improper purposes—to expand discovery in this action beyond proper bounds and pry into  
23 Rokoko’s confidential business relationships with its partners. Your requests seek a broad array of  
24 confidential information about the inner workings of Rokoko’s business, including private  
25 communications, third party contracts, and sensitive materials concerning investment decisions and  
26 financial information. Courts have routinely quashed subpoenas seeking confidential commercial  
27 information such as this. See *SPS Techs., LLC v. Briles Aero., Inc.*, 2019 U.S. Dist. LEXIS 241074 (C.D.  
28 Cal. June 24, 2019); *In re Subpoenas to Global Music Rights*, 2019 U.S. Dist. LEXIS 235809 (C.D. Cal.  
Jan. 18, 2019).

Corridor is a business partner who works with Rokoko on a project-by-project basis. The terms of  
those contracts are confidential. Naver Z is an investor in Rokoko and has signed a Shareholder  
Agreement, which is confidential. The only contractual relationship that exists between Trifork and  
Rokoko is the sale of interest in Coco Care. The details of that sale are confidential. The terms of all of  
these agreements have always been confidential and not available to the public.

Additionally, the information you request in one of your DocuSign subpoenas pertains to the personal  
emails of four individuals. None of the individuals are named parties to this case and they have an  
individual privacy right in the information requested. *Villanueva v. Cnty. of Los Angeles*, 2025 U.S. Dist.  
LEXIS 116120, at \*4 (C.D. Cal. April 14, 2025) (“Federal courts ordinarily recognize a constitutionally-  
based right of privacy that can be raised in response to discovery requests.”). Accordingly, the Subpoenas  
seek information outside the bounds of proper discovery and must be withdrawn.

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# EXHIBIT 2

1 From May 7, 2025 (the day Defendant hired ReedSmtih); Defendant made  
2 permanent, public statements on Wikipedia which accuse Plaintiff of  
3 “Defamation”, “false statements”, “false information”, “false accusations” and  
4 further wished to cast doubt on the actual existence of the case by referring to it as  
5 a “supposed lawsuit”.

- 6 • (cur | prev) ○ 19:29, 3 September 2025 Sharleenbrando123 (talk | contribs) .. (3,745 bytes) (-1,474) .. (Undid revision 1309237140 by 172.115.94.32 (talk)) (undo) (Tags: Undo, Reverted, section blanking)
- 7 • (cur | prev) ○ 22:45, 2 September 2025 172.115.94.32 (talk) .. (5,219 bytes) (+1,474) .. (Undid revision 1302422369 by 2A02:AA7:411B:AFD6:F406:EB5B:122D:9DDF (talk)) (undo) (Tags: Undo, Reverted)
- 8 • (cur | prev) ○ 08:54, 25 July 2025 2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf (talk) .. (3,745 bytes) (-1,474) .. (Removed section on 'Legal Issues' as it pertains to an ongoing court case and was added by the plaintiff as defamation.) (undo) (Tags: Reverted, section blanking)
- 9 • (cur | prev) ○ 00:40, 24 July 2025 BattyBot (talk | contribs) .. (5,219 bytes) (+12) .. (Fixed reference date error(s) (see CS1 errors: dates for details) and AWB general fixes) (undo) (Tag: AWB)
- 10 • (cur | prev) ○ 19:04, 23 July 2025 172.115.94.32 (talk) .. (5,207 bytes) (0) .. (undo)
- 11 • (cur | prev) ○ 19:03, 23 July 2025 172.115.94.32 (talk) .. (5,207 bytes) (+46) .. (→Legal Issues) (undo)
- 12 • (cur | prev) ○ 19:02, 23 July 2025 172.115.94.32 (talk) .. (5,161 bytes) (+56) .. (undo)
- 13 • (cur | prev) ○ 18:59, 23 July 2025 172.115.94.32 (talk) .. (5,105 bytes) (+1,373) .. (undo) (Tag: Disambiguation links added)
- 14 • (cur | prev) ○ 04:51, 6 July 2025 AnomieBOT (talk | contribs) m .. (3,732 bytes) (+15) .. (Dating maintenance tags: {{Cn}}) (undo)
- 15 • (cur | prev) ○ 04:31, 6 July 2025 Kuru (talk | contribs) .. (3,717 bytes) (-237) .. (rmv non-WP:RS : vanity press; paid placement site) (undo)
- 16 • (cur | prev) ○ 07:41, 13 May 2025 Sharleenbrando123 (talk | contribs) m .. (3,954 bytes) (-810) .. (False information regarding an unsettled legal dispute removed.) (undo) (Tag: section blanking)
- 17 • (cur | prev) ○ 07:39, 13 May 2025 Sharleenbrando123 (talk | contribs) m .. (4,764 bytes) (-499) .. (→Legal Issues) (undo) (Tag: references removed)
- 18 • (cur | prev) ○ 13:46, 7 May 2025 FarmerUpbeat (talk | contribs) m .. (5,263 bytes) (+1,301) .. (Reverted edit by 2A02:AA7:4046:2D91:1CE9:EFF5:4232:A710 (talk) to last version by 172.115.94.32) (undo) (Tag: Rollback)
- 19 • (cur | prev) ○ 13:45, 7 May 2025 2a02:aa7:4046:2d91:1ce9:eff5:4232:a710 (talk) .. (3,962 bytes) (-1,301) .. (False accusations about legal violations and supposed lawsuits removed.) (undo) (Tags: Reverted, references removed)
- 20 • (cur | prev) ○ 19:50, 26 April 2025 172.115.94.32 (talk) .. (5,263 bytes) (+501) .. (added a section to legal troubles.) (undo)

16 Defendant did this while also telling the Court that Plaintiff was running a  
17 “harassment campaign” against them, which is clearly the opposite. (Dkt #15, p.4,  
18 s.II)

19 **II. STATEMENT OF RELEVANT FACTS**

20 Defendant is an international brand of consumer motion capture and animation technology  
21 products. This lawsuit was filed by Matthew R. Walsh (“Plaintiff”) and is just the latest event in a  
22 long-standing harassment campaign against Defendant. The Complaint was filed May 12, 2025 in the  
23 Superior Court of California, County of Los Angeles. See Dkt. 3. The Complaint is 256 pages long  
24 including exhibits 80 pages without and has fourteen causes of action including fraudulent

25 One of the IP addresses in question (“2a02:aa7:411b:afd6:f406:eb5b:122d:9ddf”) resolve to their “HQ” office.

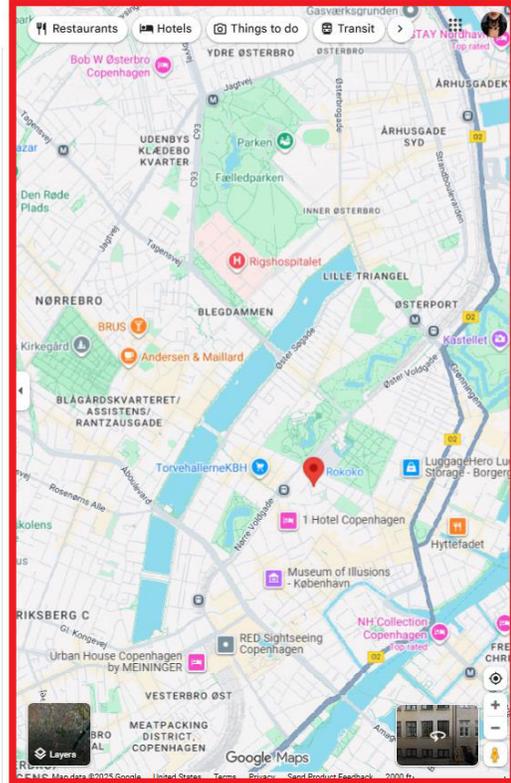
GEOLOCATION

HOME IP GEOLOCATION API FREE DATABASES



W3C Geolocation API Demo

<b>Country</b> Denmark 🇩🇰	<b>Region</b> Hovedstaden	<b>City</b> Copenhagen
<b>ZIP or Postal Code</b> 2450	<b>Latitude</b> 55.67594	<b>Longitude</b> 12.56553
<b>ISP</b> HI3G Access AB	<b>Domain Name</b> hi3gaccess.se [WHOIS] [Check Mail Server]	<b>Usage Type</b> MOB
<b>Weather</b> View Weather	<b>Time Zone</b> Europe/Copenhagen	<b>Local Time</b> 2025-09-15T21:55:29+02:00
<b>Address Type</b> Unicast	<b>Category</b> Internet Technology	<b>District</b> Copenhagen Municipality
<b>AS Number</b> 44034	<b>AS Name</b> HI3G Access AB	<b>Hosted Domain</b> -
<b>Proxy</b>	<b>Proxy Provider</b>	<b>Fraud Score</b>
<b>Weather</b> View Weather	<b>Time Zone</b> Europe/Copenhagen	<b>Local Time</b> 2025-09-15T21:55:29+02:00
<b>Address Type</b> Unicast	<b>Category</b> Internet Technology	<b>District</b> Copenhagen Municipality



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# **EXHIBIT 3**

1 Trifork claimed they have had no interactions with Defendants, Plaintiff provides multiple points  
2 of contrary proof. They ignore it. Plaintiff then sends a letter from Defendants admitting Trifork  
3 is a 22.4% owner. Trifork responds with a stonewall e-mail and echoes Counsel’s words ‘your  
4 subpoenas are invalid as the clerk didn’t sign them’. Plaintiff provided them with the cured  
5 subpoenas and they further ignored them.

6 Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO



7 Jake Molland <jake.molland@boundlegal.com>  
8 To matthew@winteryear.com

Reply Reply All Forward

Tue 9/23/2025 8:52 PM

9 You replied to this message on 9/26/2025 1:07 PM.



10 Mr. Walsh:

11 I represent Trifork US Inc. (the “Company”) with respect to the subpoena to produce documents dated Sep-  
12 tember 12, 2025 (attached). After conducting a records search, the Company has determined that neither it  
13 nor its subsidiaries have had any relevant communications or interactions with Rokoko Electronics or Rokoko  
14 Care or CoCo Care and that it has no documents responsive to the subpoena in its possession, custody, or  
15 control. Therefore, the Company is unable to produce any documents or information relevant to the subpoena  
16 request.

17 This response is provided without waiver of, and with reservation of, all rights available to the Company,  
18 including but not limited to, objections concerning valid subpoena issuance and service.

19 Best,

20 Jake Molland | Bound Legal Strategy  
21 m 734.717.2359  
22 e [jake.molland@boundlegal.com](mailto:jake.molland@boundlegal.com)

RE: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO

matthew@winteryear.com  
To 'Jake Molland'

Reply Reply All Forward

Tue 9/23/2025 9:37 PM

You forwarded this message on 9/23/2025 9:37 PM.

Signature Adoption: Drawn on Device  
Using IP Address: 87.48.43.173

Electronic Record and Signature Disclosure:  
Accepted: 9/9/2024 10:20:43 PM  
ID: f11bceb9-5f7f-42bc-bfab-8a5524961f1c

Matias Sanderwaard  
matias@rokokocare.com  
Security Level: Email, Account Authentication (None)

Signed by:  
Matias Sanderwaard

Sent: 9/5/2024 4:26:49 AM  
Viewed: 9/5/2024 8:42:58 AM  
Signed: 9/5/2024 8:43:24 AM

Signature Adoption: Pre-selected Style  
Using IP Address: 93.165.144.106

Electronic Record and Signature Disclosure:  
Accepted: 9/5/2024 8:42:58 AM  
ID: ec2e82f5-a5f9-4485-b714-ea92289e7508

Mikkel Lucas Overby  
mikkel@rokoko.com  
COO  
Security Level: Email, Account Authentication (None)

Digitally signed by:  
Mikkel Lucas Overby

Sent: 9/5/2024 4:26:49 AM  
Viewed: 9/9/2024 2:48:22 AM  
Signed: 9/9/2024 2:48:33 AM

Signature Adoption: Pre-selected Style  
Using IP Address: 87.48.131.206

Further I possess forensic data, source code, the location(s) of your server(s) and most pertinent information including it's migration for CoCo Care to The Netherlands in March once litigation became foreseeable along other important evidentiary matter which contradicts your statements wholesale.

**The deadline to provide information is September 27, 2025. No exceptions.** If the Company fails to cure these deficiencies by that date, I will move to compel and ask the Court to order you to show cause for your refusal to comply. I will also seek sanctions.

Please govern yourself accordingly.

Matthew R. Walsh  
Plaintiff in pro per

RE: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO

matthew@winteryear.com  
To 'Jake Molland'

Reply Reply All Forward

Fri 9/26/2025 1:08 PM

ReedSmith, Rokoko/Coco Care's lawyer has confirmed Trifork does in fact have a business relationship with those companies and further, you must certainly have communicated with them to effect such a sale.

Corridor is a business partner who works with Rokoko on a project-by-project basis. The terms of those contracts are confidential. Naver Z is an investor in Rokoko and has signed a Shareholder Agreement, which is confidential. The only contractual relationship that exists between Trifork and Rokoko is the sale of interest in Coco Care. The details of that sale are confidential. The terms of all of these agreements have always been confidential and not available to the public.

You have been commanded to comply. I have a motion to compel drafted and will file it should you not comply. I will seek sanctions.

Thank you  
Matthew R. Walsh

From: Jake Molland <jake.molland@boundlegal.com>  
Sent: Tuesday, September 23, 2025 8:52 PM  
To: matthew@winteryear.com  
Subject: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO

Mr. Walsh,

1 Re: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO



2 Jake Molland <jake.molland@boundlegal.com>  
To matthew@winteryear.com

3 Reply Reply All Forward ...  
Fri 9/26/2025 8:59 PM



4 Mr. Walsh,

5 Please see the attached response (also sent by FedEx). In short, I have further communicated with Trifork US Inc.  
6 as per your request and it was confirmed that Trifork US Inc. (a) conducted a search for documents responsive  
7 to the subpoena and (b) determined it has no such documents to produce. To be clear, however, the subpoena  
8 was directed to Trifork US Inc., a Delaware corporation. On initial review, the documents you reference in your  
9 correspondence below appear to relate to a parent company of Trifork US Inc., or some other entity affiliated  
10 with the parent company, and such company would be a separate legal entity. If your intention is to subpoena  
11 documents from that entity please direct your document request to that entity.

12 Additionally, please be advised that under Federal Rule of Civil Procedure 45(a)(3) only an attorney authorized  
13 to practice in the issuing court or the clerk of the court may issue and sign a subpoena. Because the subpoena  
14 bears only your signature, it appears the subpoena was invalid as issued.

15 Sincerely,

16 Jake Molland | Bound Legal Strategy  
17 m 734.717.2359  
18 e [jake.molland@boundlegal.com](mailto:jake.molland@boundlegal.com)

19 RE: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO



20 matthew@winteryear.com  
To Jake Molland

21 Reply Reply All Forward ...  
22 Sat 9/27/2025 12:53 AM

23 Mr. Molland,

24 Your client has failed to comply with the subpoena served pursuant to Rule 45 within the time allowed. The response  
25 deadline has now expired, and no complete or timely production has been made.

26 Respectfully, the belated claim that Trifork US Inc. possesses "no responsive documents" is inconsistent with evidence  
27 already before the Court demonstrating active involvement and data exchange between Trifork US Inc. and Trifork A/S.  
28 Under Rule 45(a)(1)(A)(iii), documents within Trifork A/S's control but accessible to Trifork US Inc. remain within its "pos-  
session, custody, or control." The failure to produce or properly object constitutes noncompliance. All branches of Trifork  
function as alter-egos of their parent entity. With one email sent from @trifork.com in the U.S., it can reach another at  
@trifork.com in Denmark, Germany, China, or elsewhere — meaning all relevant records can be produced easily and  
without friction.

For clarity, I do, in fact, possess clerk-signed copies of each subpoena. They are authorized, valid, and enforceable, and  
Reed Smith has been aware of this despite stating to third parties otherwise.

I understand the broader implications of this matter and the potential complexities among involved parties. If Trifork  
provides information that clarifies its role or disqualifies it from further involvement, that is fully acceptable and will be  
reflected accordingly. However, the discovery process is not optional, and your client remains obligated to produce the  
requested materials within the authority of Rule 45.

Because your client did not comply within the required timeframe, I will proceed with the Motion to Compel I already  
prepared, as I anticipated this exact scenario. I will also seek Sanctions under Rule 45(g). Please consider this notice of  
intent to seek judicial enforcement and recovery of costs associated with your client's failure to timely comply.

As I understand outside forces may be interacting with discovery, I am extending a 48-hour courtesy window for voluntary  
compliance. After that, the matter will be before the Court to order such compliance, which I believe my motion clearly  
demonstrates.

Please speak to your clients.

Thanks,  
Matthew R. Walsh

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# **EXHIBIT 4**

1 Naver-Z made service nearly impossible until a phone call was placed threatening  
2 a motion to compel/sanctions if they do not accept service as the registered agent  
3  
4 **and** law firm of Naver-Z

5

6 **Updates & Activity** Expand All Collapse All

7 Filter By: **New!**  All Activity  Service Events (Only)

8 9/26/25 5:23 PM PDT Signed Proof of Service: **NAVER Z USA, INC.**

9 9/26/25 9:41 AM PDT Service Completed: **NAVER Z USA, INC.** on 9/26/2025 9:41 AM PDT by Personal Service  
Address: 707 Wilshire Blvd Ste 4600, Los Angeles, CA 90017-3612

10 9/24/25 5:22 PM PDT Message from **CF** Christian Flores

11 9/24/25 4:52 PM PDT Message from **MW** Matthew Walsh

12 9/24/25 4:14 PM PDT Message from **MW** Matthew Walsh

13 9/24/25 10:59 AM PDT Documents Received: Process server received documents for **NAVER Z USA, INC.**

14 9/23/25 4:02 PM PDT Message from **CM** Carlos Menendez

15 9/23/25 3:59 PM PDT Non-Service Confirmed: **NAVER Z USA, INC.**  
Address: 5700 Wilshire Blvd Ste 220, Los Angeles, CA 90036-7205

16 9/23/25 3:58 PM PDT Documents Dispatched: Service documents dispatched to process server for **NAVER Z USA, INC.**

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The image shows a vertical timeline of messages and actions. A central vertical line has circular icons (info, message, edit, flag) next to it. Messages are shown as horizontal bars extending to the right from the line. Each message includes a date and time, a sender's name with initials in a circle, and the message text. Some messages have a dropdown arrow on the right. The messages are as follows:

- 9/23/25 3:58 PM PDT: Service for NAVER Z USA, INC. has been reactivated by Carlos Menendez.
- 9/23/25 2:54 PM PDT: Message from MW Matthew Walsh
- 9/23/25 2:24 PM PDT: Message from CF Christian Flores
- 9/23/25 1:25 PM PDT: Message from MW Matthew Walsh
- 9/23/25 1:21 PM PDT: Message from MW Matthew Walsh
- 9/23/25 9:38 AM PDT: Signed Proof of Non-Service: **NAVER Z USA, INC.**  
Address: 5700 Wilshire Blvd 220, Los Angeles, CA 90036
- 9/23/25 6:39 AM PDT: Action Needed: Cancel or Resume Work Item on Hold for NAVER Z USA, INC.
- 9/23/25 6:39 AM PDT: Service for NAVER Z USA, INC. has been canceled by Amy Beckmann.
- 9/23/25 6:37 AM PDT: Message from AB Amy Beckmann
- 9/22/25 7:27 PM PDT: Message from MW Matthew Walsh
- 9/22/25 5:45 PM PDT: Message from MW Matthew Walsh

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9/20/25 5:33 PM PDT  Message from **MW** Matthew Walsh 

9/20/25 5:26 PM PDT  Message from **MW** Matthew Walsh 

9/20/25 5:23 PM PDT  Message from **MW** Matthew Walsh 

9/20/25 5:23 PM PDT  Message from **MW** Matthew Walsh 

9/19/25 8:32 PM PDT  Service Attempted: **NAVER Z USA, INC.** on 9/19/2025 8:32 PM PDT  
Address: 5700 Wilshire Blvd Ste 220, Los Angeles, CA 90036-7205 

9/17/25 5:12 PM PDT  Matthew Walsh chose next service address for NAVER Z USA, INC. 

9/17/25 4:31 PM PDT  Signed Proof of Non-Service: **NAVER Z USA, INC.**  
Address: 707 WILSHIRE BLVD. SUITE 4600, Los Angeles, CA 90017

9/17/25 4:30 PM PDT  Action Needed: Choose next service address for NAVER Z USA, INC. 

9/17/25 4:29 PM PDT  Non-Service Confirmed: **NAVER Z USA, INC.**  
Address: 707 Wilshire Blvd Ste 4600, Los Angeles, CA 90017-3612 

9/17/25 4:29 PM PDT  Service Attempted: **NAVER Z USA, INC.** on 9/17/2025 4:29 PM PDT  
Address: 707 Wilshire Blvd Ste 4600, Los Angeles, CA 90017-3612 

9/17/25 12:35 AM PDT  Documents Received: Process server received documents for **NAVER Z USA, INC..** 

9/15/25 7:02 AM PDT  Filing Confirmed: Case # **2:25-cv-05340-ODW-RAO**  
Filed: US District Court, California, Central District, Los Angeles at First Street Federal Courthouse on 9/12/2025 12:00 PM PDT. 

9/15/25 7:02 AM PDT  Order Reviewed: Entered and queued for the next step. 

9/12/25 1:47 PM PDT  Order Received: Standard Delivery for Service of Process requested upon 1 party by Matthew Walsh 

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# EXHIBIT 5

1 DocuSign agreed to produce document(s), however, Defendant notified DocuSign  
2 to cease production and falsely claims “meet and confer to quash has been  
3 initiated” after no such conference had been scheduled.  
4

5  
6 Re: [EXTERNAL] RE: Subpoena Matthew R. Walsh vs. Rokoko Electronic 25-cv-05340 U...



7 Legal Process <legalprocess@docusign.com>  
8 To Matthew R. Walsh

9 Reply Reply All Forward

10 Tue 9/23/2025 5:35 PM

11 If there are problems with how this message is displayed, click here to view it in a web browser.

12 Good afternoon,

13 As an update, Docusign is aiming to produce documents responsive to this subpoena on September 30,  
14 2025. Thank you very much.

15 Sincerely,

16 **Ezra Denman** | Sr. Employment & Litigation Compliance Manager | [legalprocess@docusign.com](mailto:legalprocess@docusign.com)



1 Re: [EXTERNAL] RE: Subpoena Matthew R. Walsh vs. Rokoko Electronic 25-cv-05340 U...



2 Legal Process <legalprocess@docusign.com>  
3 To: Matthew R. Walsh

4 Reply Reply All Forward

Fri 9/26/2025 10:27 AM

5 If there are problems with how this message is displayed, click here to view it in a web browser.

6 Mr. Walsh,

7 Docusign received a communication from Reed Smith LLP, who is representing the Defendants in this action,  
8 raising objections to the issuance of these subpoenas and has stated that you are seeking "irrelevant, overbroad,  
9 and unduly burdensome confidential information". Although a Motion to Quash the subpoenas has not yet been  
10 filed, we believe it may be forthcoming.

11 As we were informed that the meet and confer process between the parties was initiated, Docusign will stay the  
12 production of any data associated with these subpoenas until the dispute has been resolved or we are ordered  
13 by a court to produce the data. Docusign confirms it will continue to preserve the documents at issue in the  
14 motion until a resolution is reached.

15 If you have any questions, please feel free to contact us. Thank you.

16 Sincerely,

17 **Ezra Denman** | Sr. Employment & Litigation Compliance Manager | [legalprocess@docusign.com](mailto:legalprocess@docusign.com)



18 RE: Re:



19 matthew@winteryear.com  
20 To: 'Ellena, Katherine J.'  
Cc: 'Graue, Emily H.'; 'Galibois, Michael B.'

21 Reply Reply All Forward

Fri 9/26/2025 12:16 PM

22 We removed extra line breaks from this message.

23 The September 30 date is, and always was a 26(f) conference meeting.

24 I specifically stated if you wanted to combine other meetings with it, those additional topics must be noticed to me, in writing  
25 prior. You chose to not respond to that. It is now Friday, my schedule is made for most of the week and I have allotted only the  
26 time that you set yourself for that meeting.

27 Further, you may want to read the local rules again. 37-1 allows for 10 days from the date of your notice of intent to quash.

28 If you somehow wish to paint me as uncooperative and unwilling, go right ahead. That can and will be addressed in your sanctions  
hearing on the 20th as well as just another display of bad faith.

Thanks  
Matt

Walsh v. Rokoko - Rule 26(f) conference



Ellena, Katherine J. <KEllena@reedsm

Required Galibois, Michael B.; matthew@winteryear.com

Accept

Tentative

Decline

🕒

⋮

Tue 9/16/2025 4:05 PM

Tuesday, September 30, 2025 2:30 PM-3:30 PM

<https://reedsmith.zoom.us/j/...>

2 PM	
3 PM	<p><b>Walsh v. Rokoko - Rule 26(f) conference</b></p> <p><a href="https://reedsmith.zoom.us/j/94727896410?pwd=gnu4RTPaEiRlgy6llqKFQlQ0HlBdVE.1">https://reedsmith.zoom.us/j/94727896410?pwd=gnu4RTPaEiRlgy6llqKFQlQ0HlBdVE.1</a></p> <p>Ellena, Katherine J.</p>
4 PM	

Ellena, Katherine J. is inviting you to a scheduled Zoom meeting

Join Zoom Meeting

<https://reedsmith.zoom.us/j/...>

Meeting ID: [REDACTED]

Passcode: [REDACTED]

IMPORTANT: Please do not reuse the meeting URL other than during the specific meeting time.

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# EXHIBIT 6

1 Defendant's demand letter. Almost entirely full of AI-fabricated caselaw.

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4  
5 **ReedSmith**

Driving progress  
through partnership

6 **Katherine J. Ellena**  
Direct Phone: +1 213 457 8254  
Email: kellena@reedsmith.com

Reed Smith LLP  
515 S. Flower Street  
Suite 4300  
Los Angeles, CA 90071  
+1 213 457 8000  
Fax +1 213 457 8080  
reedsmith.com

7  
8 September 25, 2025

9 **By Electronic Mail**

10 Matthew R. Walsh  
19197 Golden Valley Rd. #333  
Santa Clarita, CA 91387  
(661) 644-0012  
matthew@winteryear.com

11  
12 **Re: Local Rule 37-1 Meet and Confer Regarding Subpoenas for Documents Served on DocuSign,  
13 Inc.; c/o United Agent Group, Inc., Trifork US Inc., Naver Z USA, Inc., Internet Archive,  
Wikimedia Foundation, and Corridor Digital, LLC**

14 Dear Mr. Walsh,

15 Pursuant to Local Rule 37-1, Rokoko requests a meet and confer regarding the subpoenas you issued  
16 to DocuSign, Inc.; c/o United Agent Group, Inc., ("DocuSign"), Trifork US Inc. ("Trifork"), Naver Z  
USA, Inc. ("Naver Z"), Internet Archive, Wikimedia Foundation ("Wikimedia"), and Corridor Digital,  
LLC ("Corridor") (collectively the "Subpoenas") to discuss their deficiencies. If we are not able to come  
to an agreement, Rokoko will move to quash the Subpoenas and ask the Court to issue a protective order.

17 As a preliminary matter, all of the Subpoenas were improperly issued and are facially defective.  
Further, as explained in detail below, each of the Subpoenas are improper for the following reasons:

- 18
- DocuSign: the two DocuSign subpoenas are improper because they violate privacy interests, seek information that is irrelevant, and are grossly overbroad and unduly burdensome.
  - Trifork: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.
  - Naver Z: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.
  - Internet Archive: this subpoena is improper because it seeks information that is irrelevant, grossly overbroad and unduly burdensome.
  - Wikimedia: this subpoena is improper because it seeks information that is irrelevant and is grossly overbroad and unduly burdensome.
  - Corridor: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.
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25 ABU DHABI ♦ ASTANA ♦ ATHENS ♦ ATLANTA ♦ AUSTIN ♦ BEIJING ♦ BRUSSELS ♦ CENTURY CITY ♦ CHICAGO ♦ DALLAS ♦ DENVER ♦ DUBAI ♦ FRANKFURT  
HONG KONG ♦ HOUSTON ♦ LONDON ♦ LOS ANGELES ♦ MIAMI ♦ MUNICH ♦ NEW YORK ♦ ORANGE COUNTY ♦ PARIS ♦ PHILADELPHIA ♦ PITTSBURGH  
PRINCETON ♦ RICHMOND ♦ SAN FRANCISCO ♦ SHANGHAI ♦ SILICON VALLEY ♦ SINGAPORE ♦ TYSONS ♦ WASHINGTON, D.C. ♦ WILMINGTON

Matthew R. Walsh  
September 25, 2025  
Page 2

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**A. Plaintiffs In Pro Per Cannot Issue Subpoenas Without Approval From The Clerk Of The Court Or A Licensed Attorney.**

Pursuant to Fed. R. Civ. P. 45(a)(3), “[t]he clerk must issue a subpoena, signed but otherwise in blank, to a party who requests it. That party must complete it before service. An attorney also may issue and sign a subpoena if the attorney is authorized to practice in the issuing court.” *See also Ekene v. Office L. Fowler*, 2023 U.S. Dist. LEXIS 187409, at \*3 (C.D. Cal. April 13, 2023) (“Plaintiff, proceeding pro se, may only serve a subpoena issued by the Clerk of this Court.”); *McGee v. Cnty. of Riverside*, 2022 U.S. Dist. LEXIS 193707, at \*2 (C.D. Cal. Oct. 21, 2022) (“If a pro se plaintiff needs to seek information from non-parties, this must be done through a subpoena issued by the Clerk and approved by the Court.”).

None of the Subpoenas were issued by the Clerk. Instead, you signed on the line clearly delineated “Attorney’s signature” and served them. You are not a licensed attorney, and this was completely improper. Accordingly, the Subpoenas are clearly defective on their face.

**B. The Subpoenas Seek Rokoko’s Confidential Commercial Information And Violate Individual Privacy Interests.**

Courts have broad discretion to quash or modify a subpoena that seeks the disclosure of “a trade secret or other confidential research, development, or commercial information.” Fed. R. Civ. P. 45(d)(3)(B)(i). The Subpoenas to Corridor, Naver Z, and Trifork must be withdrawn because they seek highly confidential information for improper purposes—to expand discovery in this action beyond proper bounds and pry into Rokoko’s confidential business relationships with its partners. Your requests seek a broad array of confidential information about the inner workings of Rokoko’s business, including private communications, third party contracts, and sensitive materials concerning investment decisions and financial information. Courts have routinely quashed subpoenas seeking confidential commercial information such as this. *See SPS Techs., LLC v. Briles Aero., Inc.*, 2019 U.S. Dist. LEXIS 241074 (C.D. Cal. June 24, 2019); *In re Subpoenas to Global Music Rights*, 2019 U.S. Dist. LEXIS 235809 (C.D. Cal. Jan. 18, 2019).

Corridor is a business partner who works with Rokoko on a project-by-project basis. The terms of those contracts are confidential. Naver Z is an investor in Rokoko and has signed a Shareholder Agreement, which is confidential. The only contractual relationship that exists between Trifork and Rokoko is the sale of interest in Coco Care. The details of that sale are confidential. The terms of all of these agreements have always been confidential and not available to the public.

Additionally, the information you request in one of your DocuSign subpoenas pertains to the personal emails of four individuals. None of the individuals are named parties to this case and they have an individual privacy right in the information requested. *Villanueva v. Cnty. of Los Angeles*, 2025 U.S. Dist. LEXIS 116120, at \*4 (C.D. Cal. April 14, 2025) (“Federal courts ordinarily recognize a constitutionally-based right of privacy that can be raised in response to discovery requests.”). Accordingly, the Subpoenas seek information outside the bounds of proper discovery and must be withdrawn.

Matthew R. Walsh  
September 25, 2025  
Page 4

ReedSmith

facially overbroad); *see also Bradley v. Val-Mejias*, 2001 U.S. Dist. LEXIS 25278, at \*18 (D. Kan. Oct. 9, 2001) (“use of the term ‘pertaining to,’ often makes a discovery request overly broad and unduly burdensome on its face”); *Williams v. City of Dallas*, 178 F.R.D. 103, 110 (N.D. Tex. 1998) (finding “any and all documents related to” facially overbroad because “(it is limited neither by reasonable restrictions on time nor by particular documentary descriptions”)”).

All of your Subpoenas use some form of the language “all” or “any and all.” These are perfect examples of requests that are overbroad and seek information outside the scope of this litigation. Further the Subpoenas issued to Docusign, Naver Z, and Trifork not only use this overbroad language, but also lack any specificity necessary to gather relevant documents. For example, in your DocuSign subpoena you seek emails from addresses that include the company email in its entirety, which will no doubt produce documents much more far reaching than this case. *See Moon*, 232 F.R.D. at 637-38 (ruling that the subpoena is overbroad because it seeks “information regarding all pool winter covers, not only those ‘within the Far East Region,’” which are at issue in the case. (emphasis is original)); *Pearson v. Cincinnati Ins. Co.*, 2025 U.S. Dist. LEXIS 92488, at \*12-13 (C.D. Cal. April 14, 2025) (granting a motion to quash in part because the subpoena is irrelevant and overbroad in seeking information that is not limited to the damage at issue in the case and extends to other projects and clients.). By seeking “all” information from the non-parties, you seek information that has nothing to do with your claims in this litigation and falls outside the permissive scope of discovery.

**E. Rokoko Reserves The Right To Seek A Protective Order Over Future Subpoenas And Its Reasonable Attorneys’ Fees In Quashing The Subpoenas**

If these Subpoenas are not withdrawn, Rokoko will file a Motion to Quash and ask the Court to issue a protective order to bar you from issuing further defective, irrelevant, and unduly burdensome subpoenas. Fed. R. Civ. P. 26(c)(1) permits a court to issue a protective order “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense,” and allows the Court to “forbid[] the disclosure or discovery” and “forbid[] inquiry into certain matters, or limit[] the scope of disclosure or discovery to certain matters.” Fed. R. Civ. P. 26(c)(1)(A) & (D). When deciding to issue a protective order preventing or limiting discovery, courts can consider “the relevance of the requested materials, breadth of the requests, potential harm of disclosure to the movant, and the movant’s reasonable privacy interests in the materials.” *Pate v. Pac. Harbor Line, Inc.*, 2023 U.S. Dist. LEXIS 52632, at \*28-29 (C.D. Cal. Feb. 6, 2023). As made clear above, the information you are seeking is irrelevant and significantly overbroad. Rokoko, the non-parties, and the individuals mentioned in the Subpoenas have a clear privacy interest in their own personal and confidential business information, nearly all of which does not pertain to your claims or this action in any way.

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Matthew R. Walsh  
September 25, 2025  
Page 5

ReedSmith

Further, Rokoko reserves the right to seek reasonable attorneys' fees in connection with its efforts to obtain their withdrawal, quash, and/or move for a protective order over the Subpoenas.

Best,



Katherine J. Ellena  
Reed Smith LLP

KJE:jv

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# EXHIBIT 7

1 Naver-Z USA claims no responsive records with Rokoko Electronics, however, when sending that objection –  
2 Counsel included Rokoko’s counsel on the e-mail demonstrating that Naver-Z’s counsel has some type of legal  
3 communication or relationship to Rokoko Electronics; or that Defendants are actively obstructing discovery with  
4 third parties.

5 Matthew R. Walsh vs. Rokoko Electronics, et al. - C.D. Cal. Case No. 2:25-cv-05340-OD...



6 Bill Castleberry <bill.castleberry@lir>  
To matthew@winteryear.com; kellen@reedsmith.com; erague@reedsmith.com  
Cc Lisa Yang; Paul Kim; Jungji Choi

Reply Reply All Forward

Fri 10/3/2025 10:24 AM



8 Good afternoon,

9  
10 Regarding the above-referenced matter, please see the attached Objections of Non-Party Naver Z USA, Inc. To  
11 Plaintiff’s Subpoena.

12 Thank you.

13 Bill Castleberry  
Legal Assistant



14 707 Wilshire Boulevard 46th Floor  
15 Los Angeles CA 90017 USA  
16 Main: +1.213.955.9500  
17 Direct: +1.213.784.4574  
18 LimNexus.com



19 *IMPORTANT: This message and any attached documents may contain information that is confidential and/or Attorney-Client  
20 Privileged Communication or Attorney Work Product. If you have received this transmission in error, please notify the sender  
21 immediately by reply email and then delete this message. Thank you.*

1 **OBJECTIONS OF NON-PARTY NAVER Z USA, INC. TO PLAINTIFF'S SUBPOENA**

2 Pursuant to Federal Rule of Civil Procedure ("FRCP") 45(d), Non-Party Naver Z USA,  
3 Inc. ("Naver Z USA") hereby serves its objections to the Subpoena to Produce Documents,  
4 Information, or Objects in a Civil Action (the "Subpoena") issued in the matter Matthew R.  
5 Walsh v. Rokoko Electronics, Case No. 2-25-cv-05340-ODW-RAO, pending in the United States  
6 District Court for the Central District of California.

7 **GENERAL OBJECTIONS**

8 1. **Improper and Unreasonable Compliance Date.** The Subpoena was delivered to  
9 Naver Z USA's registered agent's office on September 26, 2025, with a stated compliance  
10 deadline of September 27, 2025 at 12:00 a.m.—less than 24 hours after service and before the  
11 close of the next business day. This is patently unreasonable, violates FRCP 45(d)(3)(A)(i), and  
12 renders the Subpoena unenforceable.

13 2. **Mistaken Target / Irrelevance.** The Subpoena appears premised on the incorrect  
14 assumption that Naver Z USA or its subsidiaries has had any "agreements, payments,  
15 communications, or documents" concerning Rokoko Electronics. That is incorrect. As such, the  
16 requests are irrelevant to Naver Z USA and improperly directed to the wrong entity.

17 3. **Undue Burden on Non-Party.** Naver Z USA is a non-party to this litigation. The  
18 Subpoena, as drafted, seeks broad categories of documents—"all agreements, payments,  
19 communications, or documents sufficient to show" data exchanges regarding animation/mocap,  
20 machine learning, or artificial intelligence—from January 1, 2020 to present. This request is  
21 overbroad, disproportionate, and imposes undue burden and expense on a non-party in violation of  
22 FRCP 45(d)(1)–(3).

23 4. **Lack of Possession, Custody, or Control.** To the extent the Subpoena seeks  
24 documents of Naver Z USA or its affiliates in Korea, such materials are not in Naver Z USA's  
25 possession, custody, or control. FRCP 45 does not obligate Naver Z USA to obtain and produce  
26 documents belonging to separate foreign entities.

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# **EXHIBIT 8**

1 Plaintiff provided Naver-Z with DocuSign evidence showing it's own CEO signed an agreement with Rokoko  
2 Electronics, after Naver-Z claimed "The Subpoena appears premised on the incorrect assumption that Naver Z USA  
3 or its subsidiaries has had any "agreements, payments, communications, or documents" concerning Rokoko  
4 Electronics. That is incorrect."

Envelope Id: 0FD7938A4FD44C45A08A161A6AFA16CF	Status: Completed
Subject: Rokoko Electronics ApS - 020224	
Source Envelope:	
Document Pages: 133	Signatures: 59
Certificate Pages: 8	Initials: 0
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Enabled	Anne-Sophie Gammelgaard Andersen
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	Højbro Plads 10, 2. (office 207)
	nil
	Copenhagen K, Copenhagen 1200
	aga@highbridge.dk
	IP Address: 82.192.175.2

Record Tracking		
Status: Original	Holder: Anne-Sophie Gammelgaard Andersen	Location: DocuSign
2/2/2024 3:19:44 AM	aga@highbridge.dk	

Signer Events	Signature	Timestamp
Allan M. Hansen allan.hansen@nordiskfilm.com Security Level: Email, Account Authentication (None)	 <small>DocuSigned by: Allan M. Hansen D1EBDB13E77E408...</small> Signature Adoption: Pre-selected Style Using IP Address: 87.52.108.15	Sent: 2/2/2024 5:09:25 AM Viewed: 2/3/2024 5:39:11 AM Signed: 2/3/2024 5:39:33 AM
<b>Electronic Record and Signature Disclosure:</b> Accepted: 2/3/2024 5:39:11 AM ID: 32e40e88-3600-4bca-90c0-f1bf80d822ff		
<div style="border: 2px solid red; padding: 5px;">             Anders Kullmann Klok              anders@rokoko.com              Security Level: Email, Account Authentication (None)           </div>	 <small>DocuSigned by: Anders Klok FBF506422954CE...</small> Signature Adoption: Drawn on Device Using IP Address: 80.208.66.153 Signed using mobile	Sent: 2/2/2024 5:09:25 AM Viewed: 2/3/2024 11:51:25 AM Signed: 2/3/2024 11:53:43 AM
<b>Electronic Record and Signature Disclosure:</b> Accepted: 2/3/2024 11:51:25 AM ID: 0313e45b-d7c7-4497-aa6a-74fe59892bb0		
<div style="border: 2px solid red; padding: 5px;">             Brett Bibby              brett@straythought.com              Security Level: Email, Account Authentication (None)           </div>	 <small>DocuSigned by: Brett Bibby 1048BF849CAE45D...</small> Signature Adoption: Uploaded Signature Image Using IP Address: 80.161.48.148	Sent: 2/2/2024 5:09:26 AM Resent: 2/5/2024 12:05:24 AM Viewed: 2/5/2024 12:06:14 AM Signed: 2/5/2024 12:06:34 AM
<b>Electronic Record and Signature Disclosure:</b> Accepted: 2/5/2024 12:06:14 AM ID: 8cb48002-ad23-4916-9892-11fba05cc86d		
<div style="border: 2px solid red; padding: 5px;">             Chang Kim              dl_naverzcontract@naverz-corp.com              CEO              NAVER Z Limited              Security Level: Email, Account Authentication (None)           </div>	 <small>DocuSigned by: Chang Kim EEF48E796F94FE...</small> Signature Adoption: Uploaded Signature Image Using IP Address: 211.249.71.131	Sent: 2/2/2024 5:09:31 AM Resent: 2/5/2024 12:05:24 AM Resent: 2/6/2024 2:49:01 AM Resent: 2/6/2024 3:49:13 AM Viewed: 2/6/2024 3:50:20 AM Signed: 2/6/2024 3:50:35 AM
<b>Electronic Record and Signature Disclosure:</b> Accepted: 2/6/2024 3:50:20 AM ID: 7a50820e-70a1-4b80-b44f-6194cf597992		

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# **EXHIBIT 9**

1 ESG report showing all Naver-Z subsidiaries have unified operational and  
 2 financial reporting locus across all subsidiaries undercutting their claims of no data  
 3  
 4 in their control.



## Financial Performance Indices

### SUBSIDIARIES

Classification	Company Name	Location	Major Business	Assets (KRW million)	Ownership (%)
Major subsidiaries (20)	NAVER JHub Corporation	Japan	Global business support	2,084,367	100
	NAVER Cloud Corporation	Korea	IT Infrastructure Service	1,373,971	100
	NAVER WEBTOON COMPANY Corporation	Korea	Webtoon service development and management	959,626	100
	LINE Digital Frontier Corporation	Japan	Webtoon service development and management in Japan	368,211	100
	NAVER France	France	Business development and R&D in Europe	339,500	100
	eBOOK Initiative Japan Co., Ltd.	Japan	Japan ebook service	149,796	100
	NAVER Cloud Asia Pacific Pte Ltd	Singapore	IT infrastructure operations (Asia)	90,938	100
	Studio N Corporation	Korea	Film production and distribution	82,419	100
	Works Mobile Japan Corporation	Japan	Groupware service operations and distribution (Japan)	81,596	100
	NAVER LABS Corporation	Korea	R&D	25,354	100
	C-FUND Subfund 3	France	Investment	197,023	99.75
	SVA Soda	Korea	Investment	90,601	99.52
	SB Next Media Innovation Fund	Korea	Investment	228,936	96.3
	TBT Global Growth Fund I	Korea	Investment	96,949	89.91
	WORKS MOBILE Corporation	Korea	Groupware service operations and distribution	231,354	89.41
	NAVER Financial Corporation	Korea	Electronic financial business	3,252,545	89.21
	Snow Corporation	Korea	Camera and communication application development service	277,847	82.96
	NAVER Z CO., LTD.	Korea	Mobile service development and operations	193,590	70.51
	WEBTOON Entertainment Inc	U.S.	Webtoon service development and management	1,356,681	67.52
	KREAM Corporation <sup>1)</sup>	Korea	Limited goods trading platform operations	241,704	48.75
Other subsidiaries (80)	MUNPIA INC, SVA Content Media Private Equity Fund II, N Tech Service Corp, SpringCamp Early Stage Fund 2, NAVER VIETNAM COMPANY LIMITED, Wattpad Corporation, C-FUND Subfund 5, NAVER Cloud Japan Corporation, NAVER I&S Corp, Green Web Service Corp, NAVER WEBTOON COMPANY Corporation, C-Fund, LOCUS CORPORATION, SNOW China Limited, InComms Corp, SpringCamp Early Stage Fund 1, NAVER-KTB Audio Contents Fund, SpringCamp Inc, Wattpad Webtoon Studios Inc, Watting Entertainment Limited, Cake Corporation, Playlist Corporation, NAVER CHINA CORPORATION, Smart Spring Fund, NITService Corp, NAVER CLOUD AMERICA INC, NAVER Cloud Europe GmbH, C-FUND Subfund 4, CommPartners Corp, NAVER UJHub Inc, Amuse Co.Ltd, Locus Theater Ani 2015 Culture Industry Special Purpose Company Ltd, C-FUND Subfund 2, Jakga Company Inc, Sidus Corporation, NW MEDIA CONTENTS INC, SpringCamp Early Stage Fund 4, Yiruk Information Technology (Beijing) Co., Ltd, Chengdu NCC Technology Corporation, NAVER Z Limited, STUDIO LICO Corp, SNOW China (Beijing) Co., Ltd, Studio JHS Co., Ltd, PAP Corporation, Super Labs Corporation, ZaZai Entertainment Corp, Naver-Quantum Contents 1 Fund, Beijing Metaverse China Technology Corporation, NAVER BAND Inc, SNOW Japan Corporation, Broccoli Entertainment Corporation, N Visions Co., Ltd, Audison Corporation, Do Ventures Amnes Fund, LP, LOCUS X CORPORATION, Dongman Entertainment Corporation, Semicolon Studio Corp, Mun Pia Webtoon Culture Industry Special Purpose Company Ltd, NAVER WP I, L.P., NAVER Z USA, INC., M Contents Labs Co., Ltd, NAVER HANDS Corporation, Wattpad Inc, SNOW VIETNAM COMPANY LIMITED, NAVER Z JAPAN Corporation, Wattpad Webtoon Studios Inc, Sidus and Teu Entertainment Joint Stock Company, Namain Corp, Locus Shanghai Corporation, VLAB Japan Co., Ltd, Wattpad Studios Inc, NF Insurance Services Corporation, VDO INC, SNOW Inc, WP Technology (UK), Wattpad Studios (Cell Phone Swap) Inc, NAVER WP II, LLC, WP Technology Corporation, PROTON PARENT, INC., PROTON MERGER SUB, INC.				

<sup>1)</sup> Based on the status of subsidiaries subject to consolidation in the business report, depending on whether they are major associate companies.  
<sup>2)</sup> The ownership structure of KREAM Corporation is in the form of exercising controlling power based on the shareholder structure, while the remaining 19 companies are owned with a majority of voting rights.

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# EXHIBIT 10

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Corridor Digital – certificate of non-service.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Bar number, and address): <b>Matthew Walsh &lt;matthew@winteryear.com&gt;</b> matthew@winteryear.com  TELEPHONE NO.: <b>661-644-0012</b> FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>MATTHEW R. WALSH</b>	FOR COURT USE ONLY
United States District Court, Central District of California STREET ADDRESS: <b>255 East Temple St.</b> MAILING ADDRESS: <b>255 East Temple St.</b> CITY AND ZIP CODE: <b>Los Angeles 90012</b> BRANCH NAME: <b>Edward R. Roybal Federal Building</b>	
PLAINTIFF/PETITIONER: <b>MATTHEW R. WALSH</b>	CASE NUMBER:
DEFENDANT/RESPONDENT: <b>ROKOKO ELECTRONICS; ET AL</b>	<b>2:25-cv-05340-ODW-RAO</b>
DECLARATION OF NON SERVICE	Ref. No. or File No.: <b>NF-22287</b>

I declare that I am and was on the dates herein mentioned, over the age of 18 years, not a party to nor interested in the above entitled action, and competent to be a witness therein.

I received the following documents for service:  
**SUBPOENA**

I attempted to serve **Corridor Digital, LLC c/o Jake Watson, REGISTERED AGENT**  
 at the address of **2458 HUNTER STREET STUDIO 4, LOS ANGELES, CA 90021**

and was unable to effect service for the following reasons:

**10/1/2025 10:10 AM: I was unable to deliver the documents due to a hostile environment. There's a doorbell that you rang and this guy opened the door and said I'm not welcome here and shut the door on my face, but someone else opened it for me afterwards and I went in and I rang the doorbell and no one answered it so these people are very shady in my opinion, but no one was there. I waited and that's kind of like hostile environment herebut no one is here and I waited from 9 o'clock and it's a 10 to 12 now.**

Fee for service: \$ 75.00

I am a registered California process server; my name, address, phone number, and county of registration and number are:

**Arica Ohanisian**  
**7892 Shadyspring Drive, Burbank, CA 91506**  
**818-434-2474**  
**Los Angeles , #2025115760**

For: **ABC Legal Services, LLC**  
 Registration #: **6779**  
 County: **Los Angeles**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.  
 Date: 10/03/2025

\_\_\_\_\_  
 Arica Ohanisian  
 (PRINTED NAME OF DECLARANT)

\_\_\_\_\_  
  
 (SIGNATURE OF DECLARANT)

BY FAX

# EXHIBIT 11

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Re: Rokoko - Message (HT...)

File Message Help

Delete Archive Respond All Apps Quick Steps Move Tags Editing Immersive Translate Zoom

Re: Rokoko

matthew@winteryear.com  
 To contact@corridordigital.com  
 Cc jake@corridordigital.com; sam@corridordigital.com; niko@corridordigital.com; +2 others

You replied to this message on 10/5/2025 11:26 PM.  
 This message was sent with High importance.  
 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

1.png 2 MB  
 2.png 278 KB  
 3.png 186 KB

Corridor,

Since you want to avoid being served and act hostile towards the service processors. You have been served. This is a Federal subpoena. So long as this e-mail doesn't bounce back, the Court will accept that as service. Any refusal to act upon this subpoena in the allotted time will be met with a Court Order and I will seek sanctions (likely monetary fines) for your refusal or delays.

Govern yourselves accordingly

Matthew R. Walsh  
 Plaintiff in pro per, Walsh v Rokoko

Legal standards:

- FTC v. PCCare247 Inc., 2013 U.S. Dist. LEXIS 31969, 2013 WL 841037 (S.D.N.Y. Mar. 7, 2013): Holding service by e-mail and Facebook are reasonably calculated to provide defendants with notice.
- Power Corp. of Canada v. Power Financial, 2009 U.S. Dist. LEXIS 31058, 2009 WL 982750 (M.D. Pa. Apr. 13, 2009): Authorizing service of process via e-mail where plaintiff demonstrated service through customary methods was not possible due to defendant's efforts to prevent plaintiff from ascertaining its physical location.
- MacLean-Fogg Co. v. Ningbo Fastlink Equip. Co., 2008 U.S. Dist. LEXIS 97241, 2008 WL 5100414 (N.D. Ill. Dec. 1, 2008): Authorizing service via e-mail where plaintiffs demonstrated the defendants transacted business online and were unsuccessful in effectuating traditional service.
- Seaboard Marine Ltd., Inc. v. Magnum Freight Corp., 2017 U.S. Dist. LEXIS 231098, 2017 WL 7796153 (S.D. Fla. Sept. 21, 2017): Authorizing service of process via e-mail where plaintiff presented evidence that defendant evaded service, refused to accept service via FedEx, and had communicated with the e-mail plaintiff proposed to use for service.
- Seaboard Marine Ltd., Inc. v. Magnum Freight Corp., 2017 U.S. Dist. LEXIS 231098, 2017 WL 7796153 (S.D. Fla. Sept. 21, 2017): Authorizing service of process via e-mail where plaintiff presented evidence that defendant evaded service, refused to accept service via FedEx, and had communicated with the e-mail plaintiff proposed to use for service.
- Popular Enters., LLC v. Webcom Media Group, Inc., 225 F.R.D. 560, 2004 U.S. Dist. LEXIS 26785 (E.D. Tenn. Nov. 16, 2004): Holding service upon the defendant by e-mail is fully authorized, is the method most likely to reach the defendant, and is reasonably calculated to apprise the defendant of the pendency of the action and afford it an opportunity to be heard. **The Court further reasoned an e-mail sent to an e-mail address supplied by the defendant to its domain name registrar presumably reached defendant since it did not bounce back.**
- Rio Props. v. Rio Int'l Interlink, 284 F.3d 1007 (9th Cir. 2002): Holding service of process by e-mail was proper not only because it was reasonably calculated to apprise the defendant of the pendency of the action and afford it an opportunity to respond, but also because it was the method of service most likely to reach the defendant.

**Tracking image**

The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

1 The images were sent instead a PHP script instead of just a flat image so that  
2 tracking data could be ascertained, indicating the file was in fact opened and  
3  
4 received.

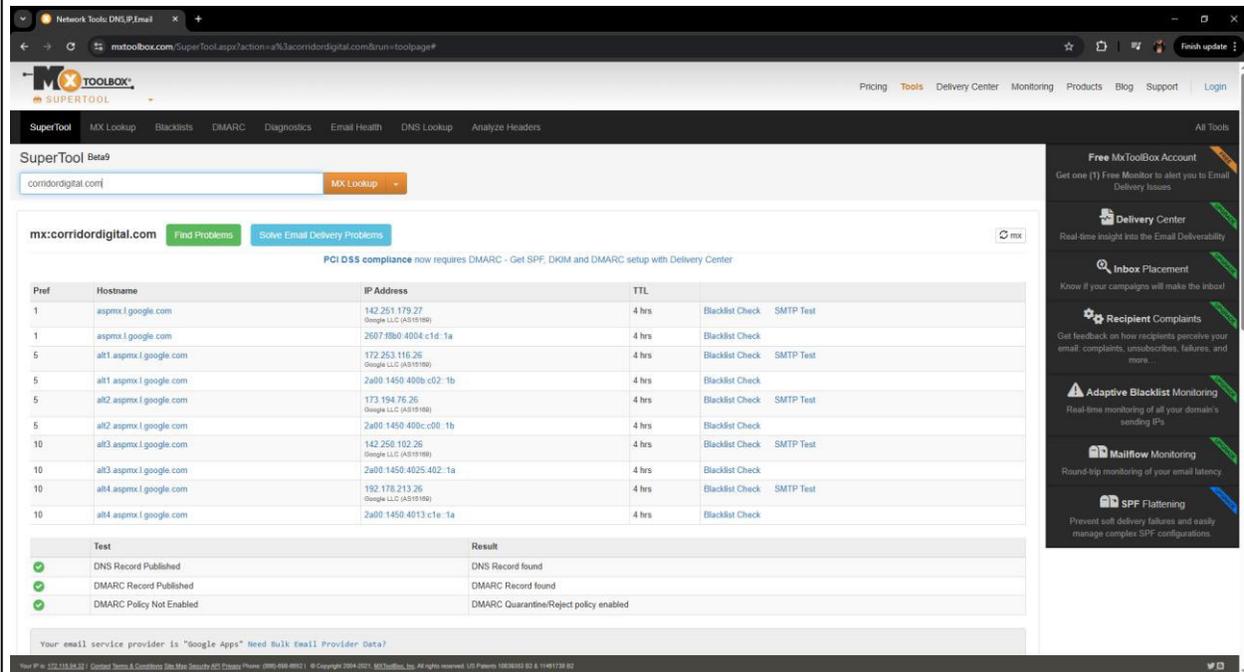
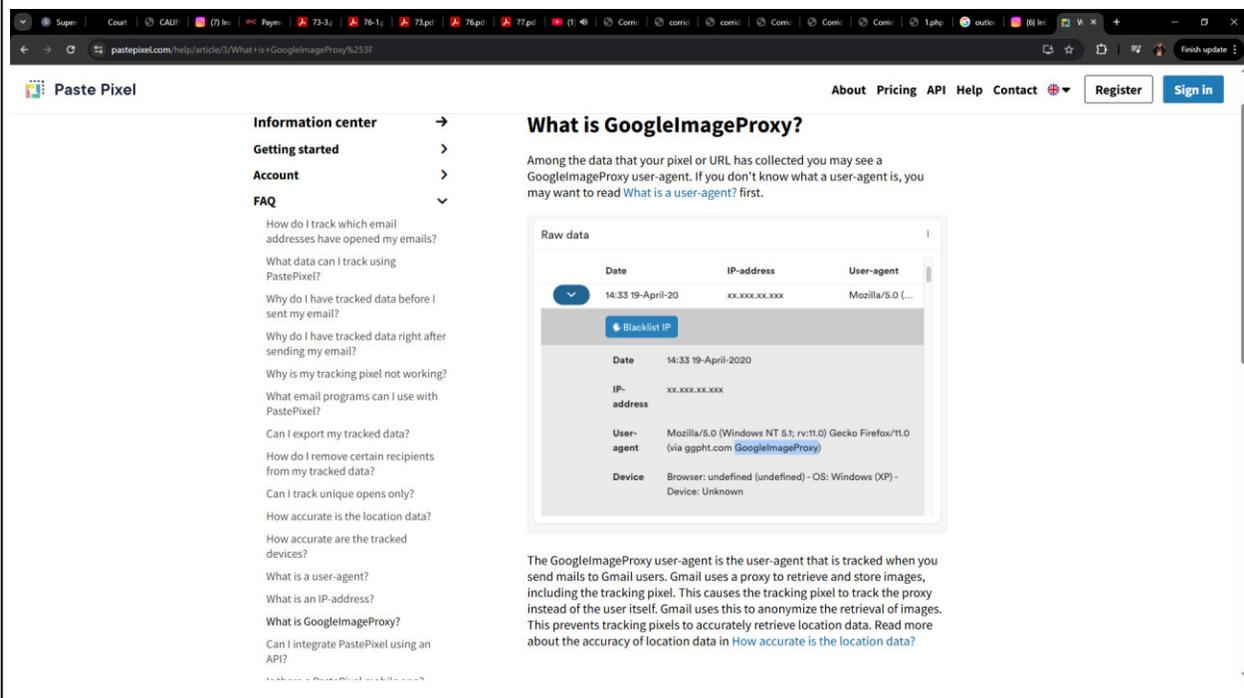
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Output
321 </p>
322 <p>
323 <span style='font-size:10.0pt;font-family:"Verdana",sans-serif'>
324 <o:p>&nbsp;</o:p>
325 </span>
326 </p>
327 <p>
328 <span style='font-size:10.0pt;font-family:"Verdana",sans-serif'>
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330 </span>
331 <span style='font-size:10.0pt;font-family:"Verdana",sans-serif'>
332 <o:p></o:p>
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344 <span style='font-size:10.0pt;font-family:"Verdana",sans-serif'>
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Ln: 329 Col: 193 size: 14.63 KB

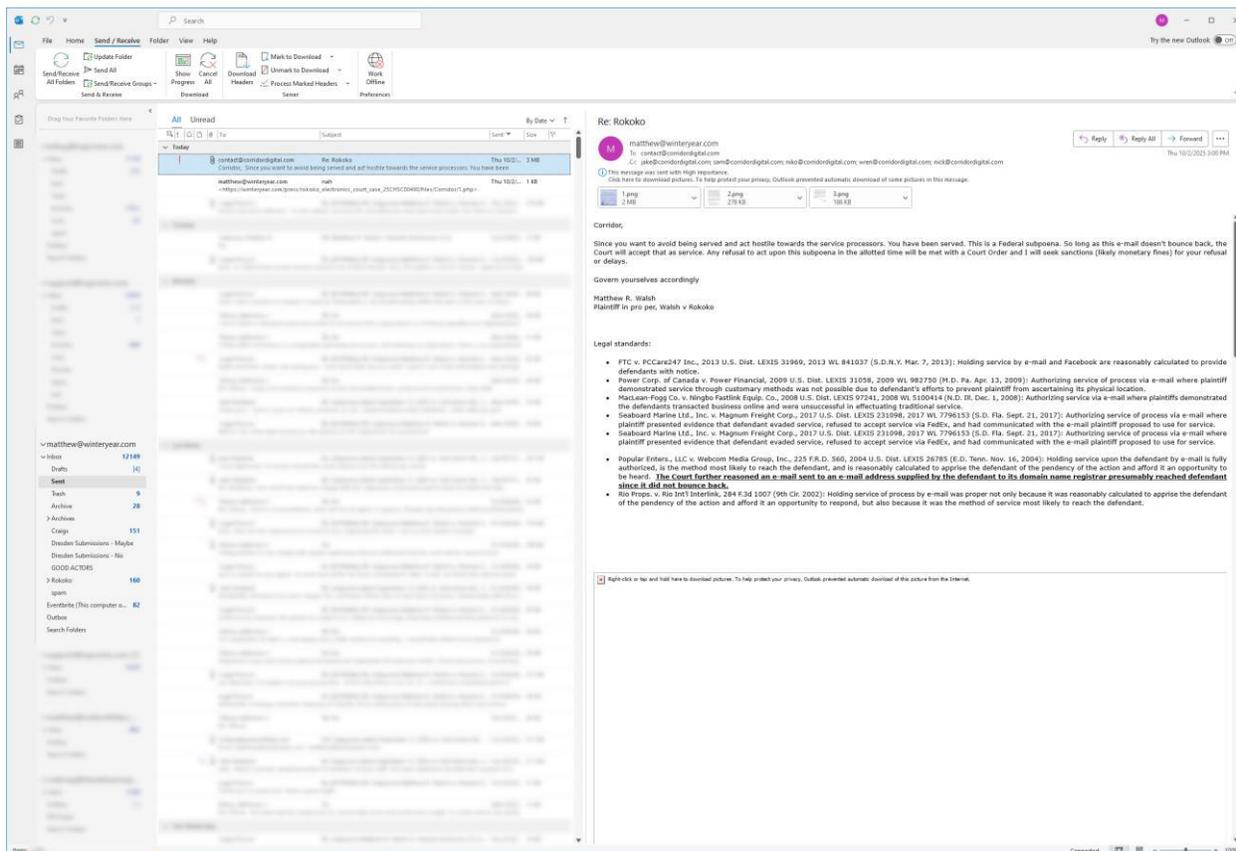
Multiple people opened the e-mail, multiple times.

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3.txt - Notepad
File Edit Format View Help
=== New Request ===
Time: 2025-10-02 17:00:28
IP: 66.249.88.162
User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT_ENCODING: gzip, deflate, br
HTTP_CONNECTION: keep-alive
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:00:34
IP: 74.125.209.67
User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT_ENCODING: gzip, deflate, br
HTTP_CONNECTION: keep-alive
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:00:36
IP: 74.125.209.68
User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT_ENCODING: gzip, deflate, br
HTTP_CONNECTION: keep-alive
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:00:45
IP: 192.232.16.68
User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/138.0.0.0 Safari/537.36
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT: text/html,application/xhtml+xml,application/xml;q=0.9,image/avif,image/webp,image/apng,*/*;q=0.8,application/signed-exchange;v=b3;q=0.7
HTTP_ACCEPT_ENCODING: gzip, deflate, br, zstd
HTTP_ACCEPT_LANGUAGE: en-US,en;q=0.9
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/138.0.0.0 Safari/537.36
HTTP_UPGRADE_INSECURE_REQUESTS: 1
HTTP_SEC_CH-UA: "Chromium";v="138", "Not:A-Brand";v="8", "Google Chrome";v="138"
HTTP_SEC_CH-UA_MOBILE: ?0
HTTP_SEC_CH-UA_PLATFORM: "Windows"
HTTP_SEC_FETCH_SITE: none
HTTP_SEC_FETCH_MODE: navigate
HTTP_SEC_FETCH_USER: ?1
HTTP_SEC_FETCH_DEST: document
HTTP_PRIORITY: u=0, i
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:02:05
IP: 74.125.209.67
User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT_ENCODING: gzip, deflate, br
HTTP_CONNECTION: keep-alive
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:09:44
IP: 74.125.209.68
User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT_ENCODING: gzip, deflate, br
HTTP_CONNECTION: keep-alive
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggph.com GoogleImageProxy)
HTTP_X_HTTPS: 1
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=== New Request ===
Time: 2025-10-02 17:11:01
IP: 63.88.73.73
User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/139.0.0.0 Safari/537.36
Referer: UNKNOWN
All Headers:
HTTP_ACCEPT: text/html,application/xhtml+xml,application/xml;q=0.9,image/avif,image/webp,image/apng,*/*;q=0.8,application/signed-exchange;v=b3;q=0.7
HTTP_ACCEPT_ENCODING: gzip, deflate, br, zstd
HTTP_ACCEPT_LANGUAGE: en-US,en;q=0.9
HTTP_HOST: winteryear.com
HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/139.0.0.0 Safari/537.36
HTTP_UPGRADE_INSECURE_REQUESTS: 1
Ln 1, Col 1 100% Windows (CRLF) UTF-8
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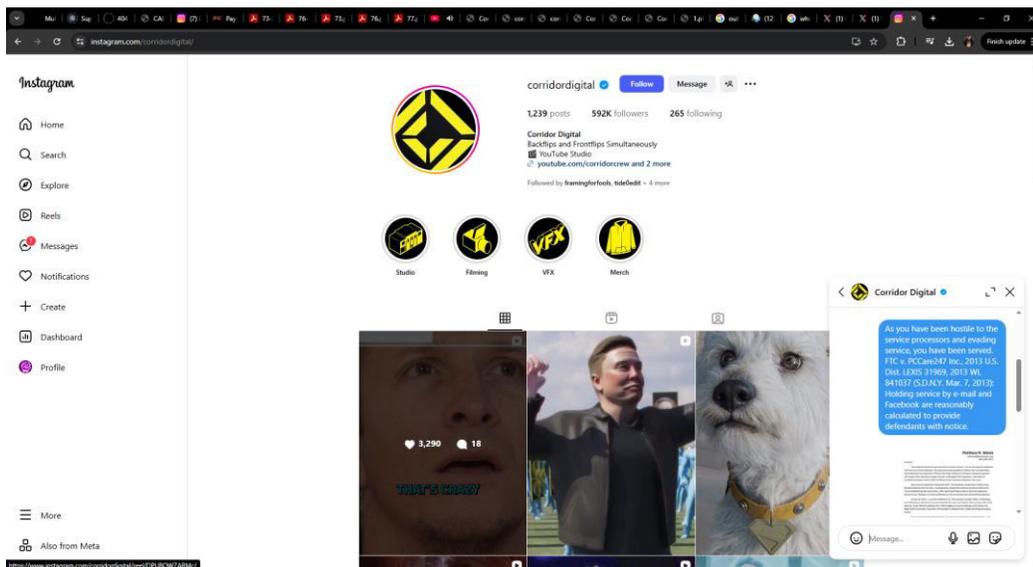
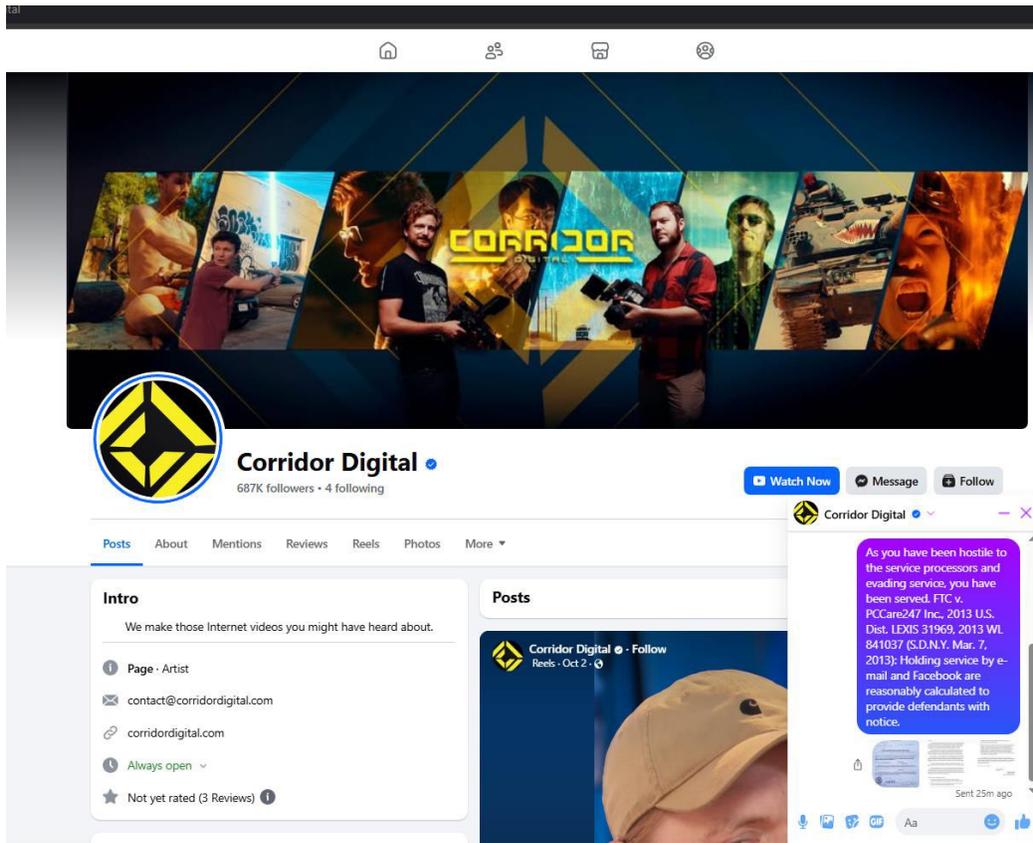
1 Corridor uses Gmail for their e-mail back end, except two users, which also appear  
2 in the tracking data.  
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No bounce backs occurred indicating no bad addresses.



Corridor was also notified by DM on Facebook and Instagram



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The screenshot shows the Instagram profile for user 'nikodig'. The profile includes a bio for Niko Pueringer, a grid of six photos, and a message window. The message window contains a legal notice: "As you have been hostile to the service processors and evading service, you have been served. FTC v. PCCare247 Inc., 2013 U.S. Dist. LEXIS 31969, 2013 WL 641037 (S.D.N.Y. Mar. 7, 2013); Holding service by e-mail and Facebook are reasonably calculated to provide defendants with notice." The profile also shows 417 posts, 111K followers, and 192 following.

The screenshot shows the Instagram profile for user 'sirwreder'. The profile includes a bio for Wren, a grid of three photos, and a message window. The message window contains the same legal notice as the first screenshot: "As you have been hostile to the service processors and evading service, you have been served. FTC v. PCCare247 Inc., 2013 U.S. Dist. LEXIS 31969, 2013 WL 641037 (S.D.N.Y. Mar. 7, 2013); Holding service by e-mail and Facebook are reasonably calculated to provide defendants with notice." The profile also shows 813 posts, 292K followers, and 664 following.

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# EXHIBIT 12

1 On or about September 16, 2025 both parties agreed on September 30, 2025 for a  
2 26(f) conference.  
3

4 Walsh v. Rokoko - Rule 26(f) conference



5 Ellena, Katherine J. <KEllena@reedsmith.com>  
6 Required Galibois, Michael B.; matthew@winteryear.com

No Response Required

Tue 9/16/2025 4:05 PM

7 ⓘ This meeting request was updated after this message was sent. You should open a later update or open the item on the calendar.

8 🕒 Tuesday, September 30, 2025 2:30 PM-3:30 PM  
📍 <https://reedsmith.zoom.us/j/94727896410?pwd=gnu4RTPaEiRlgy6llqKFQIQ0HIBdVE.1>

9 Ellena, Katherine J. is inviting you to a scheduled Zoom meeting

10 Join Zoom Meeting  
11 <https://reedsmith.zoom.us/j/94727896410?pwd=gnu4RTPaEiRlgy6llqKFQIQ0HIBdVE.1>

12 Meeting ID: 947 2789 6410  
Passcode: 163629

13 IMPORTANT: Please do not reuse the meeting URL other than during the specific meeting time.

14 One tap mobile - tap the number next to your location below to dial into your meeting (audio only):

- 15 Belgium: +3227924508,,94727896410#,,, \*163629#
- China (North & South): one tap dialing currently unavailable in China
- France: +33170394855,,94727896410#,,, \*163629#
- 16 Germany: +4969710448211 94727896410# \*163629#

17  
18 Counsel began attaching conditions to the 26(f) conference date such as requiring  
19 the meeting to cover *more topics* that are not part of a 26(f) but required under LR  
20 7-3 and LR 31-7  
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1 RE: Re:



2 Ellena, Katherine J. <KEllena@reedsr  
3 To matthew@winteryear.com  
4 Cc Graue, Emily H.; Galibois, Michael B.

Reply Reply All Forward ...

Fri 9/26/2025 11:24 AM

5 You replied to this message on 9/26/2025 11:48 AM.  
6 We removed extra line breaks from this message.

7 Mr. Walsh:

8 The matters that the Court has instructed the parties to meet and confer over are set forth in its September 9, 2025 Notice. In  
9 addition to those topics, we would also like to further discuss the various subpoenas that you have attempted to issue in the  
10 recent weeks and that are the subject of our Rule 37 letter to you yesterday.

11 Please be advised that we have retained a stenographer from Aptus Court Reporting to attend Tuesday's meet and confer and  
12 we will provide the stenographer's contact information to you when we receive it so you can order a copy of the transcript if  
13 you wish.

14 Regards,

15 Katherine J. Ellena | Senior Associate  
16 [kellena@reedsmith.com](mailto:kellena@reedsmith.com)

17 ReedSmith LLP

18 **Plaintiff objected to the unilateral conditions**

19 RE: Re:



20 matthew@winteryear.com  
21 To 'Ellena, Katherine J.'  
22 Cc 'Graue, Emily H.;; 'Galibois, Michael B.'

Reply Reply All Forward ...

Fri 9/26/2025 11:49 AM

23 We removed extra line breaks from this message.

24 Subpoena issues will not be addressed during the September 30 meet and confer. Those discussions, if necessary, will proceed  
25 at a later date consistent with the requirements of Local Rule 37-1.

26 Further, as you have previously objected to recording or transcription of conferences — and even threatened me with felony  
27 charges in that context — I likewise object to any stenographic recording, or otherwise of the September 30 meeting. Such  
28 measures are unnecessary and inappropriate for a Rule 26(f) conference.

We will limit the discussion to the matters identified in the Court's September 9, 2025 Notice.

Thank you  
Matthew R. Walsh

-----Original Message-----

Counsel began to paint Plaintiff as “unwilling” to meet and confer.

RE: Re:



Ellena, Katherine J. <KEllena@reedsr  
To matthew@winteryear.com  
Cc Graue, Emily H.; Galibois, Michael B.

Reply Reply All Forward ...

Fri 9/26/2025 12:02 PM

You replied to this message on 9/26/2025 7:05 PM.  
We removed extra line breaks from this message.

Mr. Walsh:

In light of your unwillingness to meet and confer regarding the subpoenas during our September 30th call, I will be asking the Court for an informal discovery conference to address the subpoenas. Please advise if you would like to participate in that request jointly.

There is no prohibition under California law to a court certified stenographer preparing a transcript. And considering your inaccurate recount of our last telephone call, we believe a certified stenographer is necessary.

Katherine J. Ellena | Senior Associate  
[kellena@reedsmith.com](mailto:kellena@reedsmith.com)

ReedSmith LLP

Plaintiff clarified his position and that the 30<sup>th</sup> was only for a 26(f)

RE: Re:



matthew@winteryear.com  
To 'Ellena, Katherine J.'  
Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Fri 9/26/2025 12:16 PM

We removed extra line breaks from this message.

The September 30 date is, and always was a 26(f) conference meeting.

I specifically stated if you wanted to combine other meetings with it, those additional topics must be noticed to me, in writing prior. You chose to not respond to that. It is now Friday, my schedule is made for most of the week and I have allotted only the time that you set yourself for that meeting.

Further, you may want to read the local rules again. 37-1 allows for 10 days from the date of your notice of intent to quash.

If you somehow wish to paint me as uncooperative and unwilling, go right ahead. That can and will be addressed in your sanctions hearing on the 20th as well as just another display of bad faith.

Thanks  
Matt

1 Plaintiff agreed to some of Defendant’s demands reluctantly while narrowing the  
2 scope of the meeting. Defendant refused to accept these terms.

3 RE: Re:



4 matthew@winteryear.com  
5 To 'Ellena, Katherine J.'  
6 Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Fri 9/26/2025 7:05 PM

7 You replied to this message on 9/29/2025 11:48 AM.  
8 We removed extra line breaks from this message.

9 Ms. Ellena,

10 There is no prohibition, and I am free to agree or oppose. Despite my interactions with you/Defendants I remain cautiously  
11 optimistic that some semblance of truth and professionalism can occur and therefore will do my part, I will agree to a certified  
12 stenographer on the following conditions:

- 13 1. Courtesy Copy at no cost: You will provide me a complete electronic copy of the certified transcript (ASCII or PDF with exhibits)  
14 at no cost within 5 business days of receipt.
- 15 2. Scope: The conference is limited to the Rule 26(f) topics set forth in the Court’s September 9, 2025 Notice. Subpoena issues  
16 will proceed, if necessary, under L.R. 37-1/37-2 at a later date which I will coordinate with you on.
- 17 3. A Neutral reporter: A neutral, certified reporter will be used; no ex parte communications with the reporter regarding content  
18 or certification.
- 19 4. No waiver: No statements in this conference shall be deemed a waiver of any objections, privileges or rights, and the transcript  
20 is for the limited purpose of documenting the 26(f) conference planning session.

21 If you agree to these terms, please confirm and provide the reporter’s contact information.

22 Thanks  
23 Matt

24 -----Original Message-----

19 Plaintiff followed up with Defendant in good faith since no reply was received.

21 RE: Re:



22 matthew@winteryear.com  
23 To 'Ellena, Katherine J.'  
24 Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Mon 9/29/2025 11:48 AM

25 We removed extra line breaks from this message.

26 Ms. Ellena,

27 I have not received a response to the reasonable terms I proposed for tomorrow’s Rule 26(f) conference.  
28 I will appear as scheduled and limit the discussion to the topics identified in the Court’s September 9 notice.  
For the record, I do not consent to stenographic recording absent agreement on my stated conditions.

Matt

1 After Defendant made threats of Court involvement, Plaintiff reiterated that he will  
2 now allow a 26(f) to turn into a free for all deposition of him.

3 RE: Re:



4 matthew@winteryear.com  
5 To 'Ellena, Katherine J.'  
Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Mon 9/29/2025 12:13 PM

6 We removed extra line breaks from this message.

7 A Rule 26(f) conference is a cooperative planning discussion, not testimony or deposition. There is no requirement or authority  
8 permitting a party to unilaterally record or transcribe it. I do not consent to being recorded, transcribed, or otherwise memor-  
9 ized by a third-party reporter.

10 If you wish to take my testimony, you can notice a deposition under Rule 30, which carries its own procedural safeguards. This  
11 conference is not that. Please cancel the reporter.

12 I will attend the 26(f) conference as ordered and participate fully within its proper scope — initial disclosures, scheduling, and  
13 discovery planning — but I will not waive rights by participating in a recorded proceeding that exceeds Rule 26(f)'s intent.

14 Also, those subpoenas are already issued; their existence is past-tense. Further, they are Rule 45 and should be addressed as  
15 such; not part of any 26(f) conference and I will not discuss them or any other matters outside of the specific nature of 26(f).

16 Thank you  
17 Matthew R. Walsh

18 Counsel openly states she will no longer meet and confer with Plaintiff unless she  
19 can record the calls.

20 RE: Re:



21 Ellena, Katherine J. <KEllena@reedsr  
22 To matthew@winteryear.com  
23 Cc Graue, Emily H.; Galibois, Michael B.

Reply Reply All Forward ...

Mon 9/29/2025 2:11 PM

24 You replied to this message on 9/29/2025 2:28 PM.  
25 We removed extra line breaks from this message.

26 Mr. Walsh:

27 **Given your inaccurate characterization of our last telephone call, we will not proceed with any further calls** without a certified  
28 court reporter present and will need to reschedule tomorrow's call. Because you are not willing to have a reporter present,  
the parties are at an impasse and will need to address this with the Court. Please let us know whether you will participate in  
a joint request for an Informal Discovery Conference. If not, Rokoko will request one.

Thanks,

Katherine J. Ellena | Senior Associate  
[kellena@reedsmith.com](mailto:kellena@reedsmith.com)

1 Plaintiff reiterated his position and once again, also demanded that Counsel stop  
2 making false statements that he “mischaracterized” the only 7-3 conference ever.  
3 Plaintiff further demanded that Counsel engage in 26(f), proceed through discovery  
4 and reach the merits. Defendant refused.

5 RE: Re:



6 matthew@winteryear.com

To 'Ellena, Katherine J.'

Cc 'Graue, Emily H.'; 'Galibois, Michael B.'

Reply Reply All Forward ...

Mon 9/29/2025 2:29 PM

7 We removed extra line breaks from this message.

8 I won't allow a standard meet-and-confer to be turned into a deposition or a fishing expedition for impeachment material.

9 If you intend to keep asserting that my account of the call is inaccurate, you should be prepared to substantiate that claim. Mischaracterizing events to manipulate these proceedings would be a serious error, and I am absolutely, positively 100% sure the record will support my version. This is not a thread you want to continue pulling, it's not an argument that will go well for you, and I suggest moving on from it.

10 I recommend we complete the 26(f) as a standard procedure, proceed through discovery, and reach the merits. I'm growing tired of the endless and unnecessary detours.

11  
12  
13  
14 Defendant refused and cancelled the 26(f) meet and confer, the 37-1 and the 7-3.

15 RE: Re:



16 Ellena, Katherine J. <KEllena@reedsr

17 To matthew@winteryear.com

18 Cc Graue, Emily H.; Galibois, Michael B.

19 Reply Reply All Forward ...

20 Mon 9/29/2025 3:34 PM

21 We removed extra line breaks from this message.

22 Mr. Walsh:

23 We will reschedule the meet and confer for a time after we have conducted an IDC with the Court.

24 Katherine J. Ellena | Senior Associate  
[kellena@reedsmith.com](mailto:kellena@reedsmith.com)

25 ReedSmith LLP  
26 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000  
27 | Fax: 213.457.8080 Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century City | Chicago | Dallas | Denver |  
28 Dubai | Frankfurt | Greece | Hong Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich | New York | Paris |  
Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai | Silicon Valley | Singapore | Tysons | Washington  
DC | Wilmington

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# **EXHIBIT 13**

1 Counsel openly states she will no longer meet and confer with Plaintiff unless she  
2 can record the calls.

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4 RE: Re:



5 Ellena, Katherine J. <KEllena@reedsr

To matthew@winteryear.com

Cc Graue, Emily H.; Galibois, Michael B.

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Reply Reply All Forward ...

Mon 9/29/2025 2:11 PM

13 You replied to this message on 9/29/2025 2:28 PM.  
14 We removed extra line breaks from this message.

15 Mr. Walsh:

16 **Given your inaccurate characterization of our last telephone call, we will not proceed with any further calls** without a certified  
17 court reporter present and will need to reschedule tomorrow's call. Because you are not willing to have a reporter present,  
18 the parties are at an impasse and will need to address this with the Court. Please let us know whether you will participate in  
19 a joint request for an Informal Discovery Conference. If not, Rokoko will request one.

20 Thanks,

21 Katherine J. Ellena | Senior Associate

22 [kellena@reedsmith.com](mailto:kellena@reedsmith.com)

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# **EXHIBIT 14**

1 Plaintiff provided Defendant with the signed and stamped subpoenas on or about  
2 September 26<sup>th</sup>, 2025. Counsel chose to not present these to the Court but instead  
3 unsigned subpoenas.

4 Re:



Matthew R. Walsh <matthew@winte  
To: 'Elena, Katherine J.'  
Cc: 'Graue, Emily H.'; 'Galbois, Michael B.'

Reply Reply All Forward ...

Fri 9/26/2025 5:09 PM

5 We removed extra line breaks from this message.



6  
7 Telling parties to not comply with lawful subpoenas that are authorized by the court will be raised at your sanctions hearing.  
8 I'm sorry your client is worried about what will be uncovered but that isn't my fault. Its theirs. The subpoenas are lawful and  
9 stand

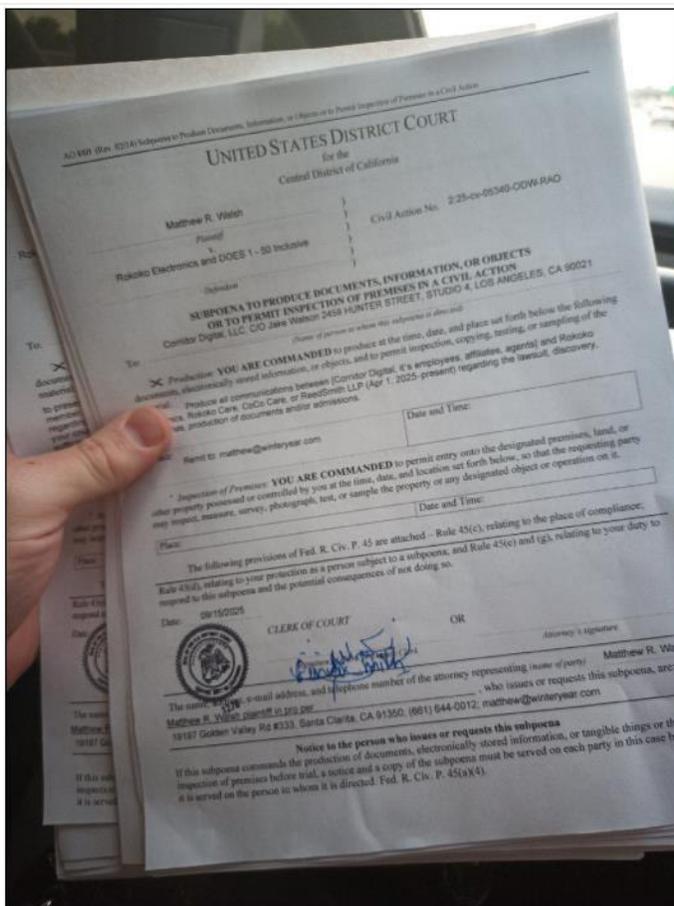
Sent via BlackBerry Hub+ Inbox for Android

Original Message

10 From: matthew@wintyear.com

11 Back to message

12 Image dimensions: 959 x 1279



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# EXHIBIT 15

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

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

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 between [Corridor Digital, its employees, affiliates, agents] and Rokoko Electronics, Rokoko Care, CoCo Care, or ReedSmith LLP (Apr 1, 2025-present) regarding the lawsuit, discovery, subpoenas, production of documents and/or admissions

Place: Remit to: matthew@winteryear.com Date and Time:

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: 09/15/2025



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

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. ) Civil Action No. 25-cv-05340-ODW-RAO  
Rokoko Electronics and DOES 1 - 50 Inclusive )  
Defendant )

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

To: Trifork US Inc.  
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:
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**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: SEP 26 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).

AO BBB (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

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:
--	----------------

\* **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: SEP 26 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).

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. ) Civil Action No. 2:25-cv-05340-ODW-RAO  
Rokoko Electronics and DOES 1 - 50 Inclusive )  
Defendant )

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 @rokokocare.com and @cococare.io

Place: Remit to matthew@winteryear.com Date and Time:

\* 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: SEP 26 2025



CLERK OF COURT

OR

Signature of 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)

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

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.

Place: Remit to matthew@winteryear.com Date and Time:

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: SEP 26 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 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).

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

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.

Place: Remit to: matthew@winteryear.com	Date and Time:
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\* **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:
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Date: SEP 26 2025



CLERK OF COURT

OR

Signature of Clerk of Court  
*[Handwritten Signature]*

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

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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. ) Civil Action No. 2:25-cv-05340-ODW-RAO  
Rokoko Electronics and DOES 1 - 50 Inclusive )  
Defendant )

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 all communications between Naver-Z and Rokoko Electronics, Rokoko Care, CoCo Care, or ReedSmith LLP (Apr 1, 2025-present) regarding the lawsuit, discovery, subpoenas, production of documents and/or admissions

Place: Remit to: matthew@winteryear.com	Date and Time:
--	----------------

\* **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:
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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: SEP 26 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

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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. ) Civil Action No. 2:25-cv-05340-ODW-RAO  
Rokoko Electronics and DOES 1 - 50 Inclusive )  
Defendant )

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

To: Trifork US Inc.,  
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 all communications between Trifork and Rokoko Electronics, Rokoko Care, CoCo Care, or ReedSmith LLP (Apr 1, 2025-present) regarding the lawsuit, discovery, subpoenas, production of documents and/or admissions

Place: Remit to matthew@winteryear.com Date and Time:

\* **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: SEP 26 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

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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

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

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.

Place: Remit to: matthew@winteryear.com Date and Time:

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: 10/10/2025



CLERK OF COURT

OR

Signature of the Court's 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).

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

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:
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**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:
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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: SEP 26 2025



CLERK OF COURT

OR

Signature of Clerk of Court 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).

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# **EXHIBIT 16**



Driving progress  
through partnership

**Katherine J. Ellena**  
Direct Phone: +1 213 457 8254  
Email: kellena@reedsmith.com

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515 S. Flower Street  
Suite 4300  
Los Angeles, CA 90071  
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reedsmith.com

September 30, 2025

### By Electronic Mail

Matthew R. Walsh  
19197 Golden Valley Rd. #333  
Santa Clarita, CA 91387  
(661) 644-0012  
matthew@winteryear.com

**Re: Federal Rule of Civil Procedure, Rule 11 Letter Regarding Plaintiff's September 29, 2025  
"Request for Judicial Notice Re: Defendant's Reliance on Fabricated Caselaw"**

Dear Mr. Walsh:

We write pursuant to Federal Rule of Civil Procedure, Rule 11 regarding your frivolous filing on September 29, 2025 titled "Request for Judicial Notice Re: Defendant's Reliance on Fabricated Caselaw" in which you falsely accuse Rokoko of relying on authorities in its September 25, 2025 meet and confer letter to you that are either AI-generated or that do not contain the quoted statements for which they were cited by Rokoko.

Federal Rule of Civil Procedure, Rule 11 imposes a duty on a party signing a pleading "to certify that they have conducted a reasonable inquiry and have determined that any papers filed with the court are well grounded in fact, legally tenable and 'not interposed for any improper purpose.'" *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990); *see also* Fed. R. Civ. P. 11. The purpose of the rule is to deter baseless filings. *Cooter*, 496 U.S. at 393; *Phonometrics, Inc. v. Econ. Inns of Am.*, 349 F.3d 1356, 1362 (Fed. Cir. 2003) (quoting *Battles v. City of Ft. Myers*, 127 F.3d 1298, 1300 (11th Cir. 1997) (the "1993 amendment to Rule 11 emphasizes an attorney's continuing obligations to make inquiries, and thus the rule allows sanctions when an attorney continues 'insisting upon a position after it is no longer tenable.'")). Thus, a party is subject to Rule 11 sanctions if it continues to advocate claims after learning they lack merit. *See* Fed. R. Civ. P. 11, advisory committee note to 1993 amendments, (Rule 11 violations "include reaffirming to the court and advocating positions contained in those pleadings and motions after learning that they have ceased to have any merit."); Fed. R. Civ. P. 11(b); *Phonometrics*, 349 F.3d at 1362.

Even a cursory review of the authorities cited by Rokoko, which are enclosed herewith, demonstrate that your Request for Judicial Notice, which you signed under penalty of perjury, is meritless. We therefore demand that you withdraw your Request for Judicial Notice within twenty-one (21) days of the date of this letter. *See* Fed. R. Civ. P. 11(c)(2). If the Request for Judicial Notice is not withdrawn within the twenty-one (21) day safe harbor period, please be advised that Rokoko will apply for relief under the Federal Rules, including sanctions and recovery of the allowable attorneys' fees and costs. In

ReedSmith

Matthew R. Walsh  
September 30, 2025  
Page 2

the interim, please be advised that Rokoko will be filing a response in opposition to your Request for Judicial Notice alerting the Court to your frivolous filing.

Rokoko reserves all rights and waives none. Please be guided accordingly.

Best,



Katherine J. Ellena  
Reed Smith LLP

KJE:hv

Enclosures