

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 **CENTRAL DISTRICT OF CALIFORNIA**

MATTHEW R. WALSH

Plaintiff In Pro Per,

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50,  
INCLUSIVE)

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 TO COMPEL  
re: REFUSAL TO ANSWER  
DISCOVERY REQUESTS / DEEM  
ADMITTED**

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**DECLARATION OF MATTHEW R. WALSH**  
**ISO MOTION TO COMPEL re: REFUSAL TO ANSWER DISCOVERY**  
**REQUESTS / DEEM ADMITTED**

I, Matthew R. Walsh, declare as follows:

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

17 Defendants failed to substantially respond to Plaintiff's Requests for Admissions  
18 (Exhibit A) within the 30-day period prescribed by Fed. R. Civ. P. 36(a)(3) and  
19 instead through litany-style boilerplate objections have refused to participate.

20 Their objections to nearly 99% of all request are included herein as **EXHIBIT A**

21  
22 I declare under penalty of perjury under the laws of the United States of America  
23 that the foregoing is true and correct.

24  
25 Executed on October, 10 2025, in Santa Clarita, California.

26 

27 Matthew R. Walsh

28 Plaintiff in pro per

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# **EXHIBIT A**

1 Katherine J. Ellena (SBN 324160)  
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10 *Attorneys for Defendant,*  
Rokoko Electronics, *et al.*

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

14 MATTHEW R. WALSH,

15 Plaintiff,

16 vs.

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

19 Defendant

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

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

**DEFENDANT ROKOKO ELECTRONICS’  
RESPONSES AND OBJECTIONS TO  
PLAINTIFF’S FIRST SET OF REQUESTS  
FOR ADMISSION**

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

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: ONE (1)

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure Rule  
5 Defendant, Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the  
6 following responses (“Responses”) to Plaintiff Matthew R. Walsh’s (“Plaintiff”) First  
7 Set of Requests for Admission.

8 **PRELIMINARY STATEMENT**

9 Defendant has not fully completed its investigation of the facts and circumstances  
10 relating to this case. Defendant’s Responses herein are based only upon current  
11 information and documents known to Defendant and disclose only those contentions  
12 which presently occur to Defendant. It is anticipated that further discovery, independent  
13 investigation, legal research, and analysis will supply additional facts, add meaning to  
14 known facts, as well as establish entirely new factual conclusions and legal contentions,  
15 all of which may lead to substantial additions to, change in and variations from the  
16 contentions set forth herein.

17 The following Responses are given without prejudice to Defendant’s right to  
18 produce evidence of any subsequently discovered fact or facts which Defendant may  
19 later obtain or recall. Rokoko accordingly reserves its right to change, supplement,  
20 amend, or modify any and all Responses herein as additional facts are ascertained,  
21 analyses are made, legal research is completed, and contentions are made. Since  
22 discovery, investigation and trial preparation are currently in progress and have not yet  
23 been completed, the foregoing Responses shall in no way be construed to prohibit or  
24 limit this answering party from producing new or additional documents, facts or  
25 evidence or producing new or additional facts, contentions or theories at subsequent  
26 hearings or at the time of trial if such new or additional information later becomes  
27 available.

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1 The Responses contained herein are made in good faith effort to supply as much  
2 factual information and as much specification of legal contentions as are presently  
3 known, but should in no way be to the prejudice of the Defendant in relation to further  
4 discovery, research, or analysis.

5 **GENERAL OBJECTIONS**

6 Each of the following Responses is subject to all objections as to relevance,  
7 materiality, propriety, and admissibility and any and all objections and ground that  
8 would result in the exclusion of any statement therein if the Requests were asked of, or  
9 any statement or omission contained herein was made by, a witness present and  
10 testifying in court. Rokoko reserves the right to assert all objections and grounds against  
11 the admissibility of any Response, in whole or in part, that may be asserted at the time  
12 of trial.

13 To the extent any Request may be construed as seeking the disclosure of  
14 privileged or immune information, including without limitation, information subject to  
15 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
16 claims such privileges and/or immunities and objects to the Requests on those grounds.  
17 Further, Rokoko objects to any Request to the extent it calls for information that is  
18 subject to any other statutory and/or common-law privilege. Inadvertent disclosure of  
19 information subject to any privilege does not waive the privilege as to other information  
20 and/or documents regarding the same subject or content and does not waive Rokoko's  
21 right to object to the introduction of such privileged information and/or documents  
22 regarding the same subject or content and does not waive Rokoko's right to object to  
23 the introduction of such privileged information and/or documents into evidence.

24 To the extent these Requests demand the disclosure of information concerning  
25 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
26 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko's  
27 attorneys.

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**RESPONSES TO PLAINTIFF’S REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1.**

Admit that the metadata provided by Plaintiff of the PDF documents filed by Defendants in this action reflects that the documents were last modified in the Eastern Time Zone.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Request is vague and ambiguous as to which “PDF documents” Plaintiff is referring. Rokoko further objects to the extent that the information sought by this Request is not relevant to the claims of either party. Rokoko further objects to the extent that this Request seeks information protected by attorney-client privilege, work product doctrine, or another applicable privilege.

**REQUEST FOR ADMISSION NO. 2.**

Admit that attorney Emily Graue affixed the typed signature “/s/ Katherine J. Ellena” to one or more PDF filings in this action.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2.**

In addition to the General Objections set forth above, Rokoko further objects to the extent that the information sought by this Request is not relevant to the claims of either party. Rokoko further objects to the extent that this Request seeks information protected by attorney-client privilege, work product doctrine, or another applicable privilege. Rokoko further objects to the extent that this Request is vague and ambiguous as to which “PDF filings” Plaintiff is referring.

**REQUEST FOR ADMISSION NO. 3.**

Admit that in Defendants’ filings concerning jurisdiction, Defendants did not disclose the property located at 44 Tehama Street, San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 3.**

In addition to the General Objections set forth above, Rokoko further objects to this Request to the extent that it seeks information that is not relevant to a claim or

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1 defense of any party and/or not reasonably calculated to lead to the discovery of  
2 admissible evidence. In his Notice of Partial Withdrawal of Motion, Plaintiff withdrew  
3 Motion to Strike as it pertained to jurisdiction and acquiesced to the jurisdiction of this  
4 Court.

5 **REQUEST FOR ADMISSION NO. 4.**

6 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics share common  
7 ownership.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 4.**

9 In addition to the General Objections set forth above, Rokoko objects to the  
10 extent that this Request is vague and ambiguous with respect the term “common  
11 ownership.” Rokoko further objects that this Request is overbroad and not limited in  
12 time, scope or subject matter. Rokoko further objects that this Request seeks  
13 information not relevant to any claim or defense of any party to this action.

14 **REQUEST FOR ADMISSION NO. 5.**

15 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics have held joint or  
16 overlapping board meetings.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 5.**

18 In addition to the General Objections set forth above, Rokoko objects to the  
19 extent that this Request is compound, and based on speculation lacking factual basis.  
20 Rokoko further objects to the extent that this Request is overly broad and not limited in  
21 time, scope or subject matter. Rokoko objects to the extent that this request is vague and  
22 ambiguous with respect the terms “joint” and “overlapping”. Rokoko further objects to  
23 the Request to the extent it seeks confidential or proprietary business information in  
24 which Rokoko and/or third parties have trade secret and/or privacy rights.

25 **REQUEST FOR ADMISSION NO. 6.**

26 Admit that Rokoko Care (“CoCo”) and Rokoko Electronics share assets.  
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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 6.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent that this Request is overly broad and not limited in time, scope or subject matter.  
4 Rokoko objects to the extent that this request is vague and ambiguous with respect the  
5 term “assets.” Rokoko further objects to the Request to the extent it seeks confidential  
6 or proprietary business information in which Rokoko and/or third parties have trade  
7 secret and/or privacy rights. Rokoko further objects to the extent that this Request seeks  
8 information not relevant to any claim or defense of any party to this action.

9 **REQUEST FOR ADMISSION NO. 7.**

10 Admit that Trifork has owned approximately 22% of Rokoko Care (“CoCo”).

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 7.**

12 In addition to the General Objections set forth above, Rokoko objects that this  
13 Request is vague, ambiguous, and not limited in scope or time. Rokoko further objects  
14 to the Request to the extent it seeks confidential or proprietary business information in  
15 which Rokoko and/or third parties have trade secret and/or privacy rights. Rokoko  
16 further objects to the extent that this Request seeks information not relevant to any claim  
17 or defense of any party to this action.

18 **REQUEST FOR ADMISSION NO. 8.**

19 Admit that the office depicted in Plaintiff’s photographs was used by Defendants  
20 as a headquarters location.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 8.**

22 In addition to the General Objections set forth above, Rokoko objects to this  
23 Request on the grounds “Plaintiff’s photographs” is vague and ambiguous, such that  
24 Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko  
25 further objects to the extent that this Request is overbroad as to scope and time, and  
26 fails to describe the information with sufficient particularity to allow Rokoko identify  
27 the “photographs” referenced. Rokoko further objects to this Request on grounds that it  
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1 seeks information that is not relevant to a claim or defense of any party and/or not  
2 reasonably calculated to lead to the discovery of admissible evidence.

3 **REQUEST FOR ADMISSION NO. 9.**

4 Admit that Mikkel Overby’s declaration in this action falsely states it was  
5 executed in Copenhagen, Denmark.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 9.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request seeks information irrelevant to the claims or defenses of any  
9 party. Rokoko further objects to the extent that this Request seeks information protected  
10 by attorney-client privilege, work product doctrine, or another applicable privilege.

11 Subject to and without waiving any of its objections, Rokoko responds as  
12 follows: **Denied.**

13 **REQUEST FOR ADMISSION NO. 10.**

14 Admit that Defendants represented in filings with this Court that Rokoko had no  
15 business ties to California.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 10.**

17 In addition to the General Objections set forth above, Rokoko objects to this  
18 Request the extent that the phrase “business ties” is vague and ambiguous. Rokoko  
19 further objects to this Request on grounds that it seeks information that is not relevant  
20 to a claim or defense of any party and/or not reasonably calculated to lead to the  
21 discovery of admissible evidence. In his Notice of Partial Withdrawal of Motion,  
22 Plaintiff withdrew Motion to Strike as it pertained to jurisdiction and acquiesced to the  
23 jurisdiction of this Court.

24 **REQUEST FOR ADMISSION NO. 11.**

25 Admit that Jakob Balslev is the CEO, CFO, and Secretary of Rokoko Electronics.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 11.**

27 In addition to the General Objections set forth above, Rokoko objects that this  
28 Request is overbroad as to scope and time and irrelevant to the claims in this action.

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1 Subject to and without waiving any of its objections, Rokoko responds as  
2 follows: **Admitted** that Jakob Balslev is Rokoko’s CEO.

3 **REQUEST FOR ADMISSION NO. 12.**

4 Admit that attorneys from Reed Smith LLP assisted in drafting Mikkel Overby’s  
5 declaration in this action.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request seeks information protected by the attorney-client privilege,  
9 work product doctrine, and other applicable privileges. Rokoko further objects to the  
10 extent that this Request seeks information that is not relevant to any claim or defense  
11 by any party. Rokoko further objects to the extent that this Request’s attempt to pry into  
12 the mental impressions or litigation strategy of Rokoko’s counsel is inappropriate,  
13 irrelevant to the any claims or defenses, unduly burdensome, and harassing. Rokoko  
14 further objects that this Request is vague and ambiguous with respect to the undefined  
15 term “assisted.”

16 **REQUEST FOR ADMISSION NO. 13.**

17 Admit that attorney Emily Graue assisted in drafting Katherine J. Ellena’s  
18 declaration in this action.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 13.**

20 In addition to the General Objections set forth above, Rokoko objects to the  
21 extent that this Request seeks information protected by the attorney-client privilege,  
22 work product doctrine, and other applicable privileges. Rokoko further objects to the  
23 extent that this Request seeks information that is not relevant to any claim or defense  
24 by any party. Rokoko further objects to the extent that this Request’s attempt to pry into  
25 the mental impressions or litigation strategy of Rokoko’s counsel is irrelevant to the any  
26 claims or defenses, unduly burdensome, and harassing. Rokoko further objects to the  
27 extent that this Request is vague and ambiguous with respect to the undefined term  
28 “assisted.”

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1 **REQUEST FOR ADMISSION NO. 14.**

2 Admit you knew Plaintiff needed his motion capture equipment to operate in  
3 order to finish his video game.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 14.**

5 In addition to the General Objections set forth above, Rokoko objects to the  
6 extent that this Request is vague and ambiguous with respect to the term “motion  
7 capture equipment.” Rokoko further objects to the extent that this Request is overbroad  
8 as to scope and time. Rokoko further objects to the extent that this Request calls for a  
9 legal conclusion and is based on hypothetical or speculative scenarios rather than fact.

10 Subject to and without waiving any of its objections, Rokoko responds as  
11 follows: **Denied.**

12 **REQUEST FOR ADMISSION NO. 15.**

13 Admit that investors who witnessed the 2022 pitch deck knew of the Company’s  
14 intentions to use “User Content” (including but not limited to Animation Data).

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 15.**

16 In addition to the General Objections set forth above, Rokoko objects to the  
17 extent that this Request seeks speculative and hypothetical information. Rokoko further  
18 objects to the extent that this Request seeks information that is not within its knowledge  
19 to admit or deny, as any response would require speculation as to the mental impressions  
20 and knowledge of third-parties who are not a part of this action. Rokoko further objects  
21 to the extent that this Request is vague and ambiguous with respect to the terms  
22 “investors,” “witnessed,” “User Content,” and “Animation Data”.

23 **REQUEST FOR ADMISSION NO. 16.**

24 Admit that before March 2025, your terms of service never granted you the rights  
25 to use or resell user animations.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 16.**

27 In addition to the General Objections set forth above, Rokoko objects to the  
28 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent

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1 that this Request lacks any temporal limitation, and is therefore unlimited as to scope  
2 and time, impermissibly broad, and unduly burdensome. Rokoko further objects to the  
3 extent that this Request is vague and ambiguous with respect to the terms “terms of  
4 service,” “rights,” “use,” and “resell,” such that Rokoko is unable to formulate a  
5 response or otherwise admit in good faith.

6 **REQUEST FOR ADMISSION NO. 17.**

7 Admit that after March 2025, your terms of service were changed to grant you  
8 the right to “anonymize” animations and resell them to third parties.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 17.**

10 In addition to the General Objections set forth above, Rokoko objects to the  
11 extent that this Request calls for a legal conclusion. Rokoko further objects to the extent  
12 that this Request is overbroad as to scope. Rokoko further objects to the extent that this  
13 Request is duplicative of Request for Admission No. 16. Rokoko further objects to the  
14 extent that this Request is vague and ambiguous with respect to the terms “changed,”  
15 “anonymize,” and “resell.”

16 **REQUEST FOR ADMISSION NO. 18.**

17 Admit that you supply, offer and/or resell user animations for financial gain.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 18.**

19 In addition to the General Objections set forth above, Rokoko objects to the  
20 extent that this Request is vague and ambiguous with respect to the term “financial  
21 gain.” Rokoko further objects to the extent that this Request is overbroad, not limited  
22 in scope or time, and is unduly burdensome and harassing. Rokoko further objects  
23 insofar as this Request seeks confidential or proprietary information.

24 **REQUEST FOR ADMISSION NO. 19.**

25 Admit that your third party recipients of the animations supply, offer and/or resell  
26 user animations for financial gain.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent it does not have sufficient information or knowledge of third-parties, such that it  
4 cannot admit to the Request after a reasonable inquiry. Rokoko further objects that this  
5 Request is unduly burdensome and harassing insofar as it would require Rokoko to  
6 speculate as to the activities of non-parties. Rokoko further objects to the extent that  
7 this Request is impermissibly broad, unlimited in scope, time, and subject matter, and  
8 vague as to the terms “third-party recipients” and “financial gain.”

9 **REQUEST FOR ADMISSION NO. 20.**

10 Admit that your animations contain CMI including but not limited to (authors  
11 name, unique serial numbers, other unique identifiers).

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent that this Request is vague and ambiguous with respect to the term “CMI.”  
15 Rokoko further objects that the Request is compound, vague, and ambiguous as  
16 phrased, such that Rokoko is unable to formulate a response or otherwise admit in good  
17 faith. Rokoko further objects to the extent that this Request seeks confidential or  
18 proprietary information protected by trade secret, the right to privacy, or any other  
19 applicable right or privilege.

20 **REQUEST FOR ADMISSION NO. 21.**

21 Admit that Plaintiff does not have an active ‘Teams’ subscription and has never  
22 purchased one.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 21.**

24 In addition to the General Objections set forth above, Rokoko objects to the  
25 extent that this Request seeks information that is not relevant to any claim or defense in  
26 this action. Rokoko further objects to the extent that this Request is unduly burdensome  
27 and harassing. Rokoko further objects to the extent that this Request seeks information  
28 outside of Rokoko’s knowledge.

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1 Subject to and without waiving any of its objections, Rokoko responds as  
2 follows: Whether Plaintiff has a “Teams” subscription is outside of Rokoko’s  
3 knowledge and therefore Rokoko lacks sufficient information to admit or deny.

4 **REQUEST FOR ADMISSION NO. 22.**

5 Admit that even without a ‘Teams’ subscription, you still collect User-Content  
6 animations.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 22.**

8 In addition to the General Objections set forth above, Rokoko objects to the  
9 extent that this Request seeks information that is not relevant to any claim or defense in  
10 this action. Rokoko further objects to the extent that this Request is unduly burdensome  
11 and harassing. Rokoko further objects that this Request is impermissibly overbroad and  
12 not limited in scope or time. Rokoko further objects to the extent that this Request is  
13 based on speculation lacking factual basis. Rokoko further objects to the extent that this  
14 Request is vague and ambiguous with respect to the term “User-Content animations.”

15 **REQUEST FOR ADMISSION NO. 23.**

16 Admit that before this lawsuit was filed, you considered or conducted AI training  
17 using user animations.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 23.**

19 In addition to the General Objections set forth above, Rokoko objects to the  
20 extent that this Request is impermissibly overbroad, unlimited in scope, time, and  
21 subject matter, and unduly burdensome and harassing. Rokoko further objects to the  
22 extent that this Request is vague and ambiguous with respect to the terms “considered,”  
23 “conducted,” and “AI training”. Rokoko further objects to the extent that this Request  
24 seeks information that is not relevant to any claim or defense in this action.

25 **REQUEST FOR ADMISSION NO. 24.**

26 Admit you do not have a working, user-controlled opt-out mechanism for data  
27 collection.

28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 24.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent that this Request is vague and ambiguous with respect to the terms “user-  
4 controlled opt-out mechanism,” and “data collection.” Rokoko further objects to the  
5 extent that this Request is impermissibly overbroad and unlimited in scope, time, and  
6 subject matter. Rokoko further objects to the extent that this Request calls for a legal  
7 conclusion.

8 **REQUEST FOR ADMISSION NO. 25.**

9 Admit that your claim of having “teams” at offices worldwide was inaccurate.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25.**

11 In addition to the General Objections set forth above, Rokoko objects to the  
12 extent that the Request seeks information that is not relevant to any claim or defense in  
13 this action. Rokoko further objects to the extent that this Request is impermissibly  
14 overbroad and unlimited in scope and time.

15 **REQUEST FOR ADMISSION NO. 26.**

16 Admit that your employee counts in marketing materials and websites overstated  
17 the number of employees.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 26.**

19 In addition to the General Objections set forth above, Rokoko objects to this  
20 Request to the extent that it seeks information that is not relevant to a claim or defense  
21 of any party and/or not reasonably calculated to lead to the discovery of admissible  
22 evidence. Rokoko further objects that this Request is vague and ambiguous, particularly  
23 as to the phrase “marketing materials and websites”. Rokoko further objects to the  
24 extent that this Request is impermissibly overbroad and not limited in scope or time.

25 Subject to and without waiving any of its objections, Rokoko responds as  
26 follows: **Denied.**

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1 **REQUEST FOR ADMISSION NO. 27.**

2 Admit you receive live telemetry from customers including but not limited to  
3 sensor status, sensor firmware versions, if it is within an error state, the error type or  
4 message

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27.**

6 In addition to the General Objections set forth above, Rokoko objects to the  
7 extent that this Request is vague and ambiguous with respect to the undefined term “live  
8 telemetry.” Rokoko further objects to the extent that this Request is overbroad,  
9 harassing, and unduly burdensome. Rokoko further objects to the extent that this  
10 Request seeks confidential or proprietary information protected by trade secret, the right  
11 to privacy, or other applicable right. Rokoko further objects to the extent that this  
12 Request calls for a legal conclusion.

13 **REQUEST FOR ADMISSION NO. 28.**

14 Admit you received telemetry demonstrating Plaintiff’s sensors were in mixed  
15 boot states

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28.**

17 In addition to the General Objections set forth above, Rokoko objects to the  
18 extent that this Request is vague and ambiguous with respect to the undefined terms  
19 “telemetry” and “mixed boot states.” Rokoko further objects to the extent that this  
20 Request is overly broad and not limited in time and scope.

21 **REQUEST FOR ADMISSION NO. 29.**

22 Admit you made the following statement “*We will therefore offer to send you*  
23 *what you have listed below on the condition that this closes the case immediately.*” --  
24 “*we are willing to go further and help you get quickly back to your projects*” -- “*That*  
25 *will allow both you and us to go back to work, which ultimately should be the goal.*”

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 29.**

27 In addition to the General Objections set forth above, Rokoko objects that this  
28 Request is ambiguous insofar as it fails to identify where the quoted language comes

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1 from, such that Rokoko is unable to admit in good faith. Rokoko further objects to the  
2 extent that this Request is vague, ambiguous, and improperly compound insofar as it  
3 seeks an admission to several statements.

4 **REQUEST FOR ADMISSION NO. 30.**

5 Admit you refused to provide Plaintiff with parts from about September 2024  
6 through about April 2025.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 30.**

8 In addition to the General Objections set forth above, Rokoko objects to the  
9 extent that this Request is vague and ambiguous with respect to the term “parts.”  
10 Rokoko objects to this Request to the extent that it seeks information that is not relevant  
11 to a claim or defense of any party and/or not reasonably calculated to lead to the  
12 discovery of admissible evidence.

13 Subject to and without waiving any of its objections, Rokoko responds as  
14 follows: **Denied.**

15 **REQUEST FOR ADMISSION NO. 31.**

16 Admit you refused to repair or replace Plaintiff’s equipment from about  
17 September 2024 through about April 2025.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 31.**

19 In addition to the General Objections set forth above, Rokoko objects to the  
20 extent that this Request is vague and ambiguous with respect to the term “equipment.”  
21 Rokoko objects to this Request to the extent that it seeks information that is not relevant  
22 to a claim or defense of any party and/or not reasonably calculated to lead to the  
23 discovery of admissible evidence.

24 Subject to and without waiving any of its objections, Rokoko responds as  
25 follows: **Denied.**

26 **REQUEST FOR ADMISSION NO. 32.**

27 Admit that changes to your firmware caused Plaintiff’s equipment to stop  
28 working.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 32.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent that this Request is vague and ambiguous with respect to the terms “changes”  
4 and “stop working.” Rokoko further objects to the extent that this Request is overbroad  
5 and not limited in scope and time. Rokoko objects to this Request to the extent that it  
6 seeks information that is not relevant to a claim or defense of any party and/or not  
7 reasonably calculated to lead to the discovery of admissible evidence.

8 Subject to and without waiving any of its objections, Rokoko responds as  
9 follows: **Denied.**

10 **REQUEST FOR ADMISSION NO. 33.**

11 Admit your motion capture suits cannot be used with any other operating  
12 software but your own.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 33.**

14 In addition to the General Objections set forth above, Rokoko objects to the  
15 extent that this Request is vague and ambiguous with respect to the terms “used” and  
16 “other operating software.” Rokoko further objects to the extent that this Request is  
17 overbroad as to scope and time. Rokoko further objects to the extent that this Request  
18 seeks confidential or proprietary information protected by trade secrets, the right to  
19 privacy, or any other applicable right or privilege. Rokoko further objects to the extent  
20 that this Request calls for a legal conclusion.

21 **REQUEST FOR ADMISSION NO. 34.**

22 Admit that you disclaim warranties.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 34.**

24 In addition to the General Objections set forth above, Rokoko objects to this  
25 Request on the grounds that “warranties” is vague and ambiguous.

26 Subject to and without waiving any of its objections, Rokoko responds as  
27 follows: **Admitted.**

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1 **REQUEST FOR ADMISSION NO. 35.**

2 Admit you have modified the terms of service *without* notification to customers.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 35.**

4 In addition to the General Objections set forth above, Rokoko objects to the  
5 extent that this Request is vague and ambiguous with respect to the terms “modified”  
6 and “notification.” Rokoko further objects to the extent that this Request is overbroad  
7 as to scope and time. Rokoko further objects to the extent that this Request is based on  
8 speculation rather than fact. Rokoko further objects to Plaintiff’s mischaracterization of  
9 the facts.

10 Subject to and without waiving any of its objections, Rokoko responds as  
11 follows: **Denied.**

12 **REQUEST FOR ADMISSION NO. 36.**

13 Admit you stated to customers *“By continuing to use Rokoko products after*  
14 *march 22, 2025, you’ll be agreeing to the updated terms”*

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

16 In addition to the General Objections set forth above, Rokoko objects to the  
17 extent that this Request fails to provide enough specificity to identify the source of the  
18 quoted language, such that the Request is vague and ambiguous. Rokoko further objects  
19 to the extent that this Request is overbroad as to scope and time.

20 **REQUEST FOR ADMISSION NO. 37.**

21 Admit “anonymizing” includes at a minimum to remove CMI

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 37.**

23 In addition to the General Objections set forth above, Rokoko objects to the  
24 extent that this Request is vague and ambiguous with respect to the undefined terms  
25 “anonymizing” and “remove CMI.” Rokoko further objects to the extent that this  
26 request is overbroad as to scope and time, and further overbroad as to subject matter  
27 insofar as it fails to identify whether “anonymizing” refers to industry practice or  
28 Rokoko’s practices specifically. Rokoko further objects to the extent that this Request

1 seeks confidential or proprietary information protected by trade secret, the right to  
2 privacy, or other applicable right or privilege. Rokoko further objects to the extent the  
3 Request calls for a legal conclusion or is the subject of premature expert discovery.

4 **REQUEST FOR ADMISSION NO. 38.**

5 Admit one animation is generally five segments

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 38.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is overbroad as to scope, time, and subject matter. Rokoko  
9 further objects to the extent that this Request is vague and ambiguous with respect to  
10 the terms “animation,” “generally,” and “segments.” Rokoko further objects to the  
11 extent that this Request seeks information irrelevant to the claims or defenses of any  
12 party to this action. Rokoko further objects that this Request is ambiguous insofar as  
13 fails to identify whether the information sought refers to industry practice or Rokoko’s  
14 practices specifically. Rokoko further objects to the extent the Request calls for a legal  
15 conclusion or is the subject of premature expert discovery.

16 **REQUEST FOR ADMISSION NO. 39.**

17 Admit you collected Plaintiff’s intellectual property (“animations”)

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 39.**

19 In addition to the General Objections set forth above, Rokoko objects to the  
20 extent that this Request is vague and ambiguous with respect to the term “collected.”  
21 Rokoko further objects to the extent that this Request is overbroad as to scope and time.  
22 Rokoko further objects to the extent that this Request calls for a legal conclusion.  
23 Rokoko further objects to the extent that this Request seeks confidential or proprietary  
24 information protected by trade secret, the right to privacy, or other applicable right or  
25 privilege. Rokoko further objects to the extent the Request calls for a legal conclusion  
26 or is the subject of premature expert discovery.

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1 **REQUEST FOR ADMISSION NO. 40.**

2 Admit that you have more than one employee in California

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 40.**

4 In addition to the General Objections set forth above, Rokoko objects to the  
5 extent that this Request is overbroad as to scope, and ambiguous as to the terms  
6 “employee” and “in California.” Rokoko further objects to the extent that this Request  
7 seeks information that is not relevant to any claims or defenses of any party to this  
8 action.

9 Subject to and without waiving any of its objections, Rokoko responds as  
10 follows: **Denied.**

11 **REQUEST FOR ADMISSION NO. 41.**

12 Admit that Rokoko Studio contains a web server with a “SECRET AREA”  
13 default realm.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 41.**

15 In addition to the General Objections set forth above, Rokoko objects to the  
16 extent that this Request is vague and ambiguous with respect to the terms “web server,”  
17 “SECRET AREA,” and “default realm.” Rokoko further objects to the extent that this  
18 Request is overbroad as to scope and time. Rokoko further objects to the extent that this  
19 Request seeks information irrelevant to any claims or defenses of any party to this  
20 action.

21 **REQUEST FOR ADMISSION NO. 42.**

22 Admit that Rokoko Studio includes functionality that can remotely disable  
23 customer use of the software.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 42.**

25 In addition to the General Objections set forth above, Rokoko objects to the  
26 extent that this Request is overbroad as to scope and time, and ambiguous as to the  
27 terms “remotely” and “disable,” and the undefined terms “functionality” and  
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1 “software.” Rokoko further objects to the extent that this Request calls for a legal  
2 conclusion.

3 **REQUEST FOR ADMISSION NO. 43.**

4 Admit Rokoko Studio can automatically mark that customers have consented to  
5 the EULA whether they actually did or not.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 43.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is overbroad as to scope and time. Rokoko further objects to the  
9 extent that this Request is vague as to the terms “automatically,” “mark,” “consented,”  
10 and “EULA”. Rokoko further objects to the extent that this Request calls for a legal  
11 conclusion.

12 **REQUEST FOR ADMISSION NO. 44.**

13 Admit that Rokoko Studio included undocumented functionality permitting  
14 remote access by Rokoko personnel.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 44.**

16 In addition to the General Objections set forth above, Rokoko further objects to  
17 the extent that this Request is overbroad as to scope and time. Rokoko further objects  
18 to the extent that this Request is vague and ambiguous as to the terms “undocumented,”  
19 “functionality,” and “remote access.” Rokoko further objects that to the extent that this  
20 Request calls for a legal conclusion.

21 **REQUEST FOR ADMISSION NO. 45.**

22 Admit that Rokoko Studio has a time-based feature which forces a user to connect  
23 to the internet to use the software in order for their animations to be synchronized with  
24 your servers.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 45.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is overbroad as to scope and time. Rokoko further objects to the  
28 extent that this Request is vague and ambiguous as to the terms “forces,” “connect,”

1 and “synchronized.” Rokoko further objects to the extent that it is based on hypothetical  
2 scenarios rather than fact. Rokoko further objects to the extent that this Request calls  
3 for a legal conclusion.

4 **REQUEST FOR ADMISSION NO. 46.**

5 Admit your software uses MQTT keep-alive to perform NAT hole punching.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 46.**

7 In addition to the General Objections set forth above, Rokoko objects to this  
8 Request to the extent that the term “keep-alive” and undefined terms “MQTT” and  
9 “NAT hole punching” are vague and ambiguous. Rokoko further objects to the extent  
10 that this Request is overbroad as to scope and time. Rokoko further objects to the extent  
11 that this Request seeks information not relevant to any claims or defenses of any party  
12 in this action.

13 **REQUEST FOR ADMISSION NO. 47.**

14 Admit some or all of your senior staff lives and works in or around Tranbjerg.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 47.**

16 In addition to the General Objections set forth above, Rokoko objects to the  
17 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
18 this Request is unduly burdensome and harassing insofar as it seeks private and personal  
19 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
20 Request to the extent that it seeks information that is not relevant to a claim or defense  
21 of any party and/or not reasonably calculated to lead to the discovery of admissible  
22 evidence.

23 **REQUEST FOR ADMISSION NO. 48.**

24 Admit some or all of your senior staff lives and works in or around Fyn.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 48.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
28 this Request is unduly burdensome and harassing insofar as it seeks private and personal

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1 information unrelated to any of Plaintiff’s claims. Rokoko further objects to this  
2 Request to the extent that it seeks information that is not relevant to a claim or defense  
3 of any party and/or not reasonably calculated to lead to the discovery of admissible  
4 evidence.

5 **REQUEST FOR ADMISSION NO. 49.**

6 Admit some or all of the user-animation data used in the making of Rokoko Care  
7 “CoCo” came from Rokoko user-content.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 49.**

9 In addition to the General Objections set forth above, Rokoko objects to the  
10 extent that the Request to admit that “some or all of the user-animation data” overbroad  
11 and unlimited as to scope and time. Rokoko further objects that, for the same reason,  
12 this Request is vague and ambiguous. Rokoko further objects to the extent that this  
13 Request seeks confidential or proprietary information protected by trade secret, the right  
14 to privacy, or other applicable right or privilege.

15 **REQUEST FOR ADMISSION NO. 50.**

16 Admit that your marketing materials included inaccurate customer or user counts.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 50.**

18 In addition to the General Objections set forth above, Rokoko objects to the  
19 extent that this Request is vague and ambiguous with respect to the terms “marketing  
20 materials,” “included,” and “inaccurate.” Rokoko further objects to the extent that this  
21 Request is overbroad as to scope and time and fails to provide enough specificity to  
22 identify what “materials” are being referenced, such that Rokoko is unable to formulate  
23 a response or otherwise admit in good faith. Rokoko further objects to the extent that  
24 customer or user counts are not relevant to any claims or defenses of any party to this  
25 action.

26 ///  
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1 Subject to and without waiving any of its objections, Rokoko responds as  
2 follows: **Denied.**

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DATED: October 10, 2025

REED SMITH LLP

By: /s/ Katherine J. Ellena  
Katherine J. Ellena  
Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

*Attorneys for Defendant  
Rokoko Electronics*

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VERIFICATION

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I, Mikkel Overby, declare:

I am the CFO and COO for Rokoko Electronics, Inc. and hereby affirm that I am authorized to make this verification on behalf of Rokoko. The information contained within **DEFENDANT ROKOKO ELECTRONICS’ RESPONSES AND OBJECTIONS TO PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSION** are true and correct to the best of my personal knowledge, information, and/or belief, based upon my own information and information given to me by others after reasonable investigation. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Rokoko reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

DATED: October 10, 2025



Mikkel Overby

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**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On October 10, 2025, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on October 10, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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9 Facsimile: +1 312.207 6400

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

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

14 MATTHEW R. WALSH,  
15 Plaintiff,  
16 vs.  
17 ROKOKO ELECTRONICS, and  
18 DOES 1 through 50, inclusive,  
19 Defendant

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

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

**DEFENDANT ROKOKO  
ELECTRONICS' RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
SECOND SET OF REQUESTS FOR  
ADMISSION**

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: TWO (2)

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure Rule  
5 Defendant, Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the  
6 following responses (“Responses”) to Plaintiff Matthew R. Walsh’s (“Plaintiff”)  
7 Second Set of Requests for Admission.

8 **PRELIMINARY STATEMENT**

9 Defendant has not fully completed its investigation of the facts and circumstances  
10 relating to this case. Defendant’s Responses herein are based only upon current  
11 information and documents known to Defendant and disclose only those contentions  
12 which presently occur to such Defendant. It is anticipated that further discovery,  
13 independent investigation, legal research, and analysis will supply additional facts, add  
14 meaning to known facts, as well as establish entirely new factual conclusions and legal  
15 contentions, all of which may lead to substantial additions to, change in and variations  
16 from the contentions set forth herein.

17 The following Responses are given without prejudice to Defendant’s right to  
18 produce evidence of any subsequently discovered fact or facts which Defendant may  
19 later obtain or recall. Rokoko accordingly reserves its right to change, supplement,  
20 amend, or modify any and all Responses herein as additional facts are ascertained,  
21 analyses are made, legal research is completed, and contentions are made. Since  
22 discovery, investigation and trial preparation are currently in progress and have not yet  
23 been completed, the foregoing Responses shall in no way be construed to prohibit or  
24 limit this answering party from producing new or additional documents, facts or  
25 evidence or producing new or additional facts, contentions or theories at subsequent  
26 hearings or at the time of trial if such new or additional information later becomes  
27 available.

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1 The Responses contained herein are made in good faith effort to supply as much  
2 factual information and as much specification of legal contentions as are presently  
3 known, but should in no way be to the prejudice of the Defendant in relation to further  
4 discovery, research, or analysis.

5 **GENERAL OBJECTIONS**

6 Each of the following Responses is subject to all objections as to relevance,  
7 materiality, propriety, and admissibility and any and all objections and ground that  
8 would result in the exclusion of any statement therein if the requests were asked of or  
9 any statement or omission contained herein was made by a witness present and  
10 testifying in court. The Defendant reserves the right to assert all objections and grounds  
11 against the admissibility of any Response, in whole or in part, that may be asserted at  
12 the time of trial.

13 To the extent any Request may be construed as seeking the disclosure of  
14 privileged or immune information, including without limitation, information subject to  
15 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
16 claims such privileges and/or immunities and objects to the Requests on those grounds.  
17 Further, Rokoko objects to any Request to the extent it calls for information that is  
18 subject to any other statutory and/or common-law privilege. Inadvertent disclosure of  
19 information subject to any privilege does not waive the privilege as to other information  
20 and/or documents regarding the same subject or content and does not waive Rokoko's  
21 right to object to the introduction of such privileged information and/or documents  
22 regarding the same subject or content and does not waive Rokoko's right to object to  
23 the introduction of such privileged information and/or documents into evidence.

24 To the extent these Requests demand the disclosure of information concerning  
25 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
26 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko's  
27 attorneys.

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**RESPONSES TO PLAINTIFF’S REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1.**

Admit that when Defendants represented to the Court that Plaintiff’s exhibits were “fabricated,” Defendants had not undertaken any effort to authenticate those exhibits, including but not limited to verifying metadata, reviewing audit logs, or consulting with any qualified expert.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Request is compound, vague and ambiguous, and overbroad as to scope and time. Rokoko further objects to the extent that this Request seeks information protected by the attorney-client privilege and/or work-product doctrine. Rokoko further objects to the extent that this Request is vague and ambiguous with respect to the term “Plaintiff’s exhibits.” Rokoko further objects to the extent that this Request seeks information that is irrelevant to any claims or defenses of any party to this action. Rokoko further objects to the extent the Request calls for a legal conclusion or is the subject of premature expert discovery.

Subject to and without waiving any of its objections, Rokoko responds as follows: **Denied.**

**REQUEST FOR ADMISSION NO. 2.**

Admit that when you stated “The Complaint consists of fabricated and fanciful allegations” you did not undertake any effort to understand or authenticate the allegations with the aid of a technological expert.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Request is compound, vague and ambiguous, and overbroad as to scope and time. Rokoko further objects to the extent that this Request seeks information protected by the attorney-client privilege and/or work-product doctrine. Rokoko further objects to the extent that this Request is vague and ambiguous with respect to the term

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1 “any effort.” Rokoko further objects that this Request seeks information that is  
2 irrelevant to any claims or defenses of any party to this action. Rokoko further objects  
3 to the extent the Request calls for a legal conclusion or is the subject of premature expert  
4 discovery.

5 Subject to and without waiving any of its objections, Rokoko responds as  
6 follows: **Denied.**

7 **REQUEST FOR ADMISSION NO. 3.**

8 Admit that you only had one 7-3 conference on June 26, 2025, yet filed  
9 documents and motions with the Court anyways.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 3.**

11 In addition to the General Objections set forth above, Rokoko objects that this  
12 Request is vague and ambiguous insofar as it fails to identify the “filed documents and  
13 motions” referenced, and further objects that this Request is compound. Rokoko further  
14 objects that this Request is unduly burdensome and harassing insofar as it seeks  
15 information already known and/or equally available to Plaintiff. Rokoko further objects  
16 to the extent that this Request seeks information protected by the attorney-client  
17 privilege and/or work-product doctrine. Rokoko further objects to the extent that the  
18 information sought by this Request is irrelevant to any claims or defenses of any party  
19 to this action.

20 Subject to and without waiving any of its objections, Rokoko responds as  
21 follows: **Denied.**

22 **REQUEST FOR ADMISSION NO. 4.**

23 Admit that you filed your motion to dismiss hours after the 7-3 conference on  
24 June 26, 2025, while knowing seven days were required prior to doing so.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 4.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is vague and ambiguous with respect to the phrase “your motion  
28 to dismiss.” Rokoko further objects this Request is unduly burdensome and harassing

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1 insofar as it seeks information known or discoverable to Plaintiff. Rokoko further  
2 objects to the extent that this Request seeks information protected by the attorney-client  
3 privilege and/or work-product doctrine. Rokoko further objects that the information  
4 sought by this Request is irrelevant to any claims or defenses of any party to this action.  
5 Rokoko further objects to the extent that this Request is ambiguous insofar as it relies  
6 on speculation as to Rokoko’s knowledge without providing sufficient basis to properly  
7 respond.

8 Subject to and without waiving any of its objections, Rokoko responds as  
9 follows: **Denied.**

10 **REQUEST FOR ADMISSION NO. 5.**

11 Admit that when you stated to the Court “Plaintiff has not provided any evidence  
12 confirming that such a copyright exists” that was a false statement as Plaintiff’s  
13 objection (Dkt #57) clearly contained U.S. Copyright #14,954,598,732.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 5.**

15 In addition to the General Objections set forth above, Rokoko objects to this  
16 Request insofar as it mischaracterizes the facts: Plaintiff’s unilateral disagreement with  
17 Rokoko’s statement does not render the statement false. Rokoko further objects to the  
18 extent this Request is unduly burdensome and harassing. Rokoko further objects to the  
19 extent this Request fails to identify with specificity where or when the quoted statement  
20 was made, such that Rokoko is unable to formulate a response or otherwise admit in  
21 good faith.

22 Subject to and without waiving any of its objections, Rokoko responds as  
23 follows: **Denied.**

24 **REQUEST FOR ADMISSION NO. 6.**

25 Admit that when Defendants represented to the Court that “this lawsuit was filed  
26 by Matthew R. Walsh and is just the latest event in a long-standing harassment  
27 campaign against Defendant,” Defendants had never reported to Plaintiff, any law  
28

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1 enforcement agency, or any regulatory authority that they believed Defendant was being  
2 “harassed” by Plaintiff.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 6.**

4 In addition to the General Objections set forth above, Rokoko further objects to  
5 the extent this Request fails to identify with specificity where or when the quoted  
6 statement was made, such that Rokoko is unable to formulate a response or otherwise  
7 admit in good faith. Rokoko further objects to the extent this Request is overbroad as to  
8 scope and time, particularly with respect to the term “never reported.” Rokoko further  
9 objects to the extent this Request is vague and ambiguous with respect to the terms  
10 “reported,” “law enforcement agency,” or “regulatory authority.” Rokoko further  
11 objects that this Request is unduly burdensome and harassing.

12 **REQUEST FOR ADMISSION NO. 7.**

13 Admit that Defendant gave no prior notice to Plaintiff prior to June 12, 2025 that  
14 you were removing the case to Federal Court.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 7.**

16 In addition to the General Objections set forth above, Rokoko objects that this  
17 Request is unduly burdensome and harassing insofar as it seeks information already  
18 known to Plaintiff or equally discoverable by Plaintiff. Rokoko further objects to the  
19 extent this Request is vague and ambiguous with respect to the term “prior notice.”  
20 Rokoko further objects to the extent this Request seeks information protected by the  
21 attorney-client privilege and/or work-product doctrine. Rokoko further objects to the  
22 extent this Request seeks information not to any claims or defenses of any party to this  
23 action.

24 **REQUEST FOR ADMISSION NO. 8.**

25 Admit that when Mikkel Overby stated “*The Denmark office is approximately*  
26 *886.4 square meters with a 62 square meter basement*” that the square meter  
27 measurements were falsely portrayed.

28

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 8.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent this Request fails to provide enough specificity to identify the source of the  
4 quoted language, such that the Request is vague and ambiguous. Rokoko objects to the  
5 extent the accuracy of the language referenced by the Request is not relevant to any  
6 claims or defenses of any party to this matter. Rokoko further objects that this Request  
7 is unduly burdensome and harassing.

8 Subject to and without waiving any of its objections, Rokoko responds as  
9 follows: **Denied.**

10 **REQUEST FOR ADMISSION NO. 9.**

11 Admit that Defendant or it’s subsidiaries has an interest in the Delaware LLC:  
12 Rokoko, LLC.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 9.**

14 In addition to the General Objections set forth above, Rokoko objects to the  
15 extent this Request is vague and ambiguous with respect to the terms “subsidiaries” and  
16 “interest,” such that Rokoko is unable to formulate a response or otherwise admit in  
17 good faith. Rokoko further objects to the extent this Request is overbroad as to scope  
18 and time. Rokoko further objects to the extent this Request is improperly compound  
19 insofar as it seeks and admission regarding both “Defendant” and “it’s subsidiaries.”

20 **REQUEST FOR ADMISSION NO. 10.**

21 Admit that the Copenhagen “HQ” is unstaffed generally.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 10.**

23 In addition to the General Objections set forth above, Rokoko objects to the  
24 extent this Request is vague and ambiguous with respect to the term “generally” and the  
25 undefined term “unstaffed.” Rokoko further objects that this Request is vague and  
26 ambiguous insofar as it fails to sufficiently identify or define “Copenhagen ‘HQ.’”  
27 Rokoko further objects to the extent this Request seeks information that is not relevant  
28

1 to any claims or defenses of any party to this action, and to the extent this Request is  
2 unduly burdensome and harassing.

3 **REQUEST FOR ADMISSION NO. 11.**

4 Admit you have less than 30 employees.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 11.**

6 In addition to the General Objections set forth above, Rokoko further objects to  
7 the extent this Request is overbroad as to scope and time. Rokoko further objects to the  
8 extent this Request seeks information that is not relevant to any claims or defenses of  
9 any party to this action, and that this Request is unduly burdensome and harassing.

10 **REQUEST FOR ADMISSION NO. 12.**

11 Admit that Counsel knew pro hac vice applications were required to be filed *prior*  
12 to practicing law before this Court including but not limited to authoring and filing  
13 documents.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 12.**

15 In addition to the General Objections set forth above, Rokoko objects to the  
16 extent this Request is vague and ambiguous with respect to the undefined term  
17 “Counsel.” Rokoko further objects to the extent this Request seeks the discovery of  
18 attorney-mental impressions and information protected by the attorney-client privilege  
19 or work product doctrine. Rokoko further objects to the extent that admissions regarding  
20 the *pro hac vice* status of any attorney are not relevant to any claims or defenses by any  
21 party to this action. Rokoko further objects that this Request is unduly burdensome and  
22 harassing insofar as it is a speculative mischaracterization of events without factual  
23 support.

24 **REQUEST FOR ADMISSION NO. 13.**

25 Admit that Emily Graue continued calling and e-mailing Plaintiff after the Court  
26 removed her from the docket.

27  
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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 13.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent this Request is vague and ambiguous with respect to the terms “calling” and  
4 “emailing.” Rokoko further objects to the extent this Request is overbroad as to scope  
5 and time, and ambiguous with respect to the phrase “removed her from the docket.”  
6 Rokoko further objects that this Request is unduly burdensome and harassing insofar as  
7 it presents hypothetical or false scenarios as fact or otherwise mischaracterizes events.

8 **REQUEST FOR ADMISSION NO. 14.**

9 Admit that when Counsel stated “That additional attorneys have been included  
10 in signature blocks indicating that pro hac petitions were pending” this was a false  
11 statement as no application had been submitted prior to June 17, 2025.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 14.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent this Request is vague and ambiguous with respect to the undefined term  
15 “Counsel.” Rokoko further objects that Plaintiff fails to identify the source of the quoted  
16 language with sufficient specificity, such that Rokoko is unable to formulate a response  
17 or otherwise admit in good faith. Rokoko further objects that this Request is unduly  
18 burdensome and harassing insofar as it mischaracterizes the facts. Rokoko further  
19 objects that this Request seeks information protected by the work product doctrine  
20 and/or attorney-client privilege. Rokoko further objects that this Request seeks  
21 information not related to any claim or defense of any party to this action.

22 **REQUEST FOR ADMISSION NO. 15.**

23 Admit that when Counsel “Contrary to Plaintiff’s contentions, a Reed Smith  
24 attorney licensed in California has filed each document in this action” that this statement  
25 avoids the question of authorship and signatory.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 15.**

27 In addition to the General Objections set forth above, Rokoko objects that this  
28 Request is vague and ambiguous with respect to the undefined term “Counsel.” Rokoko

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1 further objects that Plaintiff fails to identify the source of the quoted language with  
2 sufficient specificity, such that Rokoko is unable to formulate a response or otherwise  
3 admit in good faith. Rokoko further objects that this Request is unduly burdensome and  
4 harassing insofar as it seeks an admission to confirm Plaintiff’s speculative  
5 characterizations, rather than seeking an admission based in fact. Rokoko further  
6 objects to the extent that this Request seeks information protected by the work product  
7 doctrine or attorney-client privilege. Rokoko further objects that this Request seeks  
8 information that is not relevant to any claims or defense of any party to this action.

9 **REQUEST FOR ADMISSION NO. 16.**

10 Admit that Mikkel Overby’s declaration contains contradictions with his earlier  
11 declaration.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 16.**

13 In addition to the General Objections set forth above, Rokoko objects that this  
14 Request is vague and ambiguous insofar as it fails to identify or define “Mikkel  
15 Overby’s declaration” or “earlier declaration,” such that Rokoko is unable to formulate  
16 a response or otherwise admit in good faith. Rokoko further objects to the extent that  
17 this Request is vague and ambiguous with respect to the term “contradictions.” Rokoko  
18 further objects that this Request is overbroad as to scope and time.

19 Subject to and without waiving any of its objections, Rokoko responds as  
20 follows: **Denied.**

21 **REQUEST FOR ADMISSION NO. 17.**

22 Admit that Mikkel Overby’s declaration (Dkt #1) stated the “HQ” is “86.4 square  
23 meters” but then in a later declaration contradicted himself in Dkt #62 by stating it was  
24 “886.4 square meters”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 17.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 extent that this Request is compound, vague, and ambiguous as asked, such that Rokoko  
28 is unable to formulate a response or otherwise admit in good faith. Rokoko further

1 objects that the square footages purportedly stated are not relevant to any claim or  
2 defense of any party to this action, such that this Request is unduly burdensome and  
3 harassing.

4 Subject to and without waiving any of its objections, Rokoko responds as  
5 follows: **Denied.**

6 **REQUEST FOR ADMISSION NO. 18.**

7 Admit that the metadata Plaintiff extracted from the PDF files served upon him  
8 is accurate.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 18.**

10 In addition to the General Objections set forth above, Rokoko objects that this  
11 Request is vague and ambiguous with respect to the terms “metadata” and “accurate.”  
12 Rokoko further objects that this Request fails to provide enough specificity for Rokoko  
13 to identify information relevant to this Request. Rokoko further objects to the extent  
14 that this Request is overbroad as to scope and time. Rokoko further objects that this  
15 Request seeks information that is not relevant to any claims or defenses of any party to  
16 this action, such that this Request is unduly burdensome and harassing.

17 **REQUEST FOR ADMISSION NO. 19.**

18 If 18 is Denied, Admit that you did not enlist an expert technologist to assist you  
19 in your determination.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 19.**

21 In addition to the General Objections set forth above, Rokoko objects to the  
22 extent that this Request is vague and ambiguous with respect to the terms “assist” and  
23 “determination,” and the undefined term “expert technologist.” Rokoko further objects  
24 that this Request is overbroad as to scope and time. Rokoko further objects to the extent  
25 that the process and methods by which to respond to a discovery request, including  
26 Request No. 18, are protected work-product doctrine and/or attorney-client privilege.  
27 Rokoko further objects that the methods by which to respond to discovery are not  
28

1 relevant to any claim or defense of any party to this action, such that the Request is  
2 unduly burdensome and harassing.

3 **REQUEST FOR ADMISSION NO. 20.**

4 Admit that you have more customers in California than Denmark.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 20.**

6 In addition to the General Objections set forth above, Rokoko objects to the  
7 extent that this Request is vague and ambiguous with respect to the term “customers.”  
8 Rokoko further objects that this Request is overbroad as to scope and time. Rokoko  
9 further objects to the extent that this Request seeks information that is not relevant the  
10 claims or defenses of any party to this action.

11 **REQUEST FOR ADMISSION NO. 21.**

12 Admit many or all of your core operational servers are located in Los Angeles.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 21.**

14 In addition to the General Objections set forth above, Rokoko objects to the  
15 extent that this Request is vague and ambiguous with respect to the term “core  
16 operational servers.” Rokoko further objects that this Request is ambiguous and  
17 overbroad as to scope and time, insofar as it seeks an admission regarding “many or all”  
18 servers. Rokoko further objects to the extent that this Request seeks confidential or  
19 proprietary information protected by trade secrets, the right to privacy, or any other  
20 applicable right or privilege.

21 **REQUEST FOR ADMISSION NO. 22.**

22 Admit that Defendant did not disclose to the Danish government the existence of  
23 its continued operations in California after receiving multi-million-dollar funding or  
24 investments.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 22.**

26 In addition to the General Objections set forth above, Rokoko objects that this  
27 Request is vague and ambiguous with respect to the terms “disclose,” “existence,” and  
28 “continued operation,” “funding,” and “investments.” Rokoko further objects that this

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1 Request is overbroad as to scope and time. Rokoko further objects to the extent that this  
2 Request seeks confidential or proprietary information. Rokoko further objects that this  
3 Request is unduly burdensome and harassing insofar as it seeks financial information  
4 unrelated to any claims or defenses of any party to this action.

5 **REQUEST FOR ADMISSION NO. 23.**

6 Admit that Emily Graue authored or edited documents in this action while no pro  
7 hac vice status was granted to her.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 23.**

9 In addition to the General Objections set forth above, Rokoko objects that this  
10 Request seeks information protected by the work-product doctrine and/or attorney-  
11 client privilege. Rokoko further objects that this Request is unduly burdensome and  
12 harassing insofar as it seeks discovery of clearly privileged information. Rokoko further  
13 objects that this Request is vague and ambiguous with respect to the terms “authored”  
14 and “edited.” Rokoko further objects that this Request is overbroad as to scope and time.  
15 Rokoko further objects that the *pro hac vice* status of any attorney in this action is not  
16 relevant to any claim or defense by any party to this action.

17 **REQUEST FOR ADMISSION NO. 24.**

18 Admit that when Counsel stated “[Plaintiff stated he] is going to oppose pretty  
19 much everything” that statement was false.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 24.**

21 In addition to the General Objections set forth above, Rokoko objects that this  
22 Request is vague and ambiguous because it fails to identify the source of the quoted  
23 language with sufficient specificity such that Rokoko is unable to formulate a response  
24 or otherwise admit in good faith. Rokoko further objects to the extent that this Request  
25 is vague and ambiguous with respect to the term “false” and the undefined term  
26 “Counsel.” Rokoko further objects that this Request is unduly burdensome and  
27 harassing insofar as Plaintiff’s unilateral interpretation and/or mischaracterization of the  
28 facts does not render the purported statement false.

1 **REQUEST FOR ADMISSION NO. 25.**

2 Admit that Counsel threatened Plaintiff with penal codes and “all statutory and  
3 civil remedies” once he stated he transcribed the meet and confer on June 26, 2025.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 25.**

5 In addition to the General Objections set forth above, Rokoko objects that this  
6 Request is vague and ambiguous with respect to the term “threatened” and undefined  
7 term “Counsel.” Rokoko further objects that this Request is overbroad as to scope and  
8 time, and ambiguous insofar as it fails to identify when the alleged statements were  
9 made. Rokoko further objects that this Request seeks information that is not relevant to  
10 any claim or defense of any party in this action. Rokoko further objects that this Request  
11 is unduly burdensome and harassing.

12 **REQUEST FOR ADMISSION NO. 26.**

13 Admit that during the June 26, 2025 Local Rule 7-3 conference, Counsel for  
14 Defendant raised their voices at Plaintiff, laughed or giggled at Plaintiff, and made  
15 disparaging or condescending comments about Plaintiff’s status, filings or actions as a  
16 pro se litigant.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 26.**

18 In addition to the General Objections set forth above, Rokoko objects to the  
19 extent that this Request is vague and ambiguous with respect to the terms “raised their  
20 voices,” “laughed,” “giggled,” “disparaging,” and “condescending.” Rokoko further  
21 objects that this Request is overbroad as to scope and improperly compound such that  
22 Rokoko is unable to formulate a response or otherwise admit in good faith. Rokoko  
23 further objects that this Request is compound to the extent that it is vague and  
24 ambiguous. Rokoko further objects that Plaintiff’s mischaracterization or subjective  
25 interpretation of the events alleged in the Request is not relevant to any claim or defense  
26 of any party to this action.

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1 **REQUEST FOR ADMISSION NO. 27.**

2 Admit that during the June 26, 2025 Local Rule 7-3 conference, Counsel for  
3 Defendant made statements to Plaintiff intended to dissuade him from pursuing his  
4 Motion to Strike removal, including remarks suggesting Plaintiff lacked the ability or  
5 basis to succeed.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 27.**

7 In addition to the General Objections set forth above, Rokoko objects to the  
8 extent that this Request is vague and ambiguous with respect to the terms “intended,”  
9 “dissuade,” and “pursing.” Rokoko further objects that this Request fails to describe the  
10 “Motion to Strike removal” referenced with sufficient particularity such that Rokoko is  
11 unable to formulate a response or otherwise admit in good faith. Rokoko further objects  
12 that this Request is overbroad as to scope. Rokoko further objects to the extent that  
13 Plaintiff’s mischaracterization or subjective interpretation of the events alleged in the  
14 Request is not relevant to any claim or defense of any party to this action.

15 **REQUEST FOR ADMISSION NO. 28.**

16 Admit your Motion to Dismiss does not contain exactly 6,999 words.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 28.**

18 In addition to the General Objections set forth above, Rokoko objects that this  
19 Request is vague and ambiguous with respect to the undefined terms “your.” Rokoko  
20 further objects that this Request fails to identify the “Motion to Dismiss” referenced  
21 with sufficient specificity for Rokoko to formulate a response. Rokoko further objects  
22 that this Request is unduly burdensome and harassing insofar as it seeks information  
23 equally available to the Plaintiff. Rokoko further objects that the exact word count of a  
24 motion is not relevant to any claim or defense in this action.

25 **REQUEST FOR ADMISSION NO. 29.**

26 Admit that Defendant’s Motion to Dismiss did not include a memorandum of  
27 points and authorities, and therefore could not have contained exactly 6,999 words as  
28 represented to the Court.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 29.**

2 In addition to the General Objections set forth above, Rokoko further objects that  
3 this Request fails to identify the “Defendant’s Motion to Dismiss” referenced with  
4 sufficient specificity for Rokoko to formulate a response. Rokoko further objects that  
5 this Request is compound, and therefore vague and ambiguous. Rokoko further objects  
6 that the exact word count of a motion is not relevant to any claim or defense in this  
7 action. Rokoko further objects that this Request is unduly burdensome and harassing  
8 insofar as it seeks information equally available to the Plaintiff. Rokoko further objects  
9 to the extent that this Request is duplicative of Request No. 28.

10 **REQUEST FOR ADMISSION NO. 30.**

11 Admit that when you stated Plaintiff’s allegations were “fanciful,” “fabricated,”  
12 or part of a “harassment campaign,” those statements were rhetorical in nature and not  
13 supported by any factual investigation.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 30.**

15 In addition to the General Objections set forth above, Rokoko objects to the  
16 extent that this Request is overbroad as to scope and time. Rokoko further objects that  
17 this Request is vague and ambiguous insofar as it fails to provide enough specificity to  
18 identify the source of the quoted language. Rokoko further objects to the extent that this  
19 Request seeks information protected by the work-product and/or attorney client  
20 privilege. Rokoko further objects to the extent that this Request is vague and ambiguous  
21 with respect to the terms “rhetorical in nature” and “supported.” Rokoko further objects  
22 to the extent this Request seeks an admission regarding Plaintiff’s characterization of  
23 statements made in litigation, which is completely unrelated to any claims or defenses  
24 by any party to this action.

25 **REQUEST FOR ADMISSION NO. 31.**

26 Admit that Counsel Emily Graue, Katherine J. Ellena, Michael Galibois and  
27 Heather Valencia do not possess the technical capability to interpret or reproduce the  
28 forensic evidence Plaintiff has placed before this Court.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 31.**

2 In addition to the General Objections set forth above, Rokoko objects that this  
3 Request is improperly compound insofar as it seeks an admission regarding the  
4 ambiguously described “capabilities” of four separate individuals. Rokoko further  
5 objects to the extent that this Request is vague and ambiguous with respect to the terms  
6 “technical capability,” “interpret,” and “reproduce.” Rokoko further objects that this  
7 Request fails to identify the evidence “Plaintiff has placed before the Court” with  
8 sufficient specificity for Rokoko to admit in good faith. Rokoko further objects to the  
9 extent this Request is overbroad as to scope and time. Rokoko further objects to the  
10 extent that this Request seeks information protected by the work-product doctrine  
11 and/or attorney-client privilege. Rokoko further objects that information regarding the  
12 interpretation of facts and evidence by Reed Smith LLP employees is not relevant to  
13 any claims or defenses of any party in this action and protected by the work-product  
14 and/or attorney-client privilege.

15 **REQUEST FOR ADMISSION NO. 32.**

16 Admit that Counsel Emily Graue, Katherine J. Ellena, Michael Galibois, and  
17 Heather Valencia do not possess the technical expertise to interpret advanced forensic  
18 and software evidence, including but not limited to programming languages (such as  
19 C#), database queries (SQL, GraphQL), networking protocols (HTTP/HTTPS,  
20 WebSocket), debugging tools (stack traces, hex editor dumps), software engineering  
21 methods (multi-threading, obfuscation, scalable databases, system design), or hardware  
22 concepts (microcontroller programming, gyroscopic or accelerometer-based tracking,  
23 and electrical engineering).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 32.**

25 In addition to the General Objections set forth above, Rokoko objects that this  
26 Request is improperly compound insofar as it seeks an admission regarding the  
27 ambiguously defined “expertise” of four separate individuals. Rokoko further objects  
28 that this Request is vague and ambiguous with respect to the terms “technical expertise,”

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1 “interpret,” and “advanced forensic and software evidence.” Rokoko further objects to  
2 the extent that this Request is vague and ambiguous with respect to the litany of  
3 undefined technical terms contained within. Rokoko further objects to the extent this  
4 Request is overbroad as to scope and time. Rokoko further objects that information  
5 regarding the interpretation of facts and evidence by Reed Smith LLP employees is not  
6 relevant to any claims or defenses of any party in this action and protected by the work-  
7 product and/or attorney-client privilege. Rokoko further objects to the extent that this  
8 Request is duplicative of Request No. 31.

9 **REQUEST FOR ADMISSION NO. 33.**

10 Admit that Counsel Emily Graue, Katherine J. Ellena, Michael Galibois, and  
11 Heather Valencia do not possess the technical expertise to conduct or analyze  
12 cybersecurity methods, including but not limited to man-in-the-middle (MITM)  
13 captures, packet sniffing, proxy redirection, metadata extraction, or multi-protocol  
14 communication analysis.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 33.**

16 In addition to the General Objections set forth above, Rokoko objects that this  
17 Request is improperly compound insofar as it seeks information regarding the  
18 ambiguously defined “expertise” of four separate individuals. Rokoko further objects  
19 that this Request is vague and ambiguous with respect to the terms “technical expertise,”  
20 “conduct,” and “analyze.” Rokoko further objects to the extent that this Request is  
21 vague and ambiguous with respect to the litany of undefined technical terms contained  
22 within. Rokoko further objects that this Request is overbroad as to scope and time.  
23 Rokoko further objects that information regarding the interpretation of facts and  
24 evidence by Reed Smith LLP employees is not relevant to any claims or defenses of  
25 any party in this action and protected by the work-product and/or attorney-client  
26 privilege. Rokoko further objects to the extent that this Request is duplicative of  
27 Request Nos. 31 and 32.

28

1 **REQUEST FOR ADMISSION NO. 34.**

2 Admit that no attorney at Reed Smith has performed any cybersecurity analysis  
3 of Plaintiff’s evidence in this case.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 34.**

5 In addition to the General Objections set forth above, Rokoko further objects that  
6 this Request is vague and ambiguous with respect to the terms “performed, and  
7 “analysis.” Rokoko further objects that this Request is overbroad, vague, and  
8 ambiguous insofar as it fails to sufficiently identify the “Plaintiff’s evidence”  
9 referenced. Rokoko further objects that this Request is overbroad as to scope and time,  
10 particularly with the usage of the terms “no attorney” and “any . . . analysis”. Rokoko  
11 further objects that information regarding the interpretation of facts and evidence by  
12 Reed Smith LLP employees is not relevant to any claims or defenses of any party in  
13 this action and protected by the work-product and/or attorney-client privilege. Rokoko  
14 further objects to the extent that this Request is duplicative of Request Nos. 31, 32, and  
15 33.

16 **REQUEST FOR ADMISSION NO. 35.**

17 Admit that Mikkel Overby’s initial declaration contains a handwritten signature  
18 placed by him.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 35.**

20 In addition to the General Objections set forth above, Rokoko objects that this  
21 Request fails to identify the “initial declaration” with sufficient particularity, rendering  
22 the the Request is vague and ambiguous such that Rokoko is unable to formulate a  
23 response or otherwise admit in good faith. Rokoko further objects that this Request is  
24 overbroad as to time and scope. Rokoko further objects that the methods by which  
25 Rokoko drafts litigation documents is not relevant to any claim or defense of any party  
26 to this action.

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1 **REQUEST FOR ADMISSION NO. 36.**

2 Admit that Mikkel Overby’s second declaration contains a DocuSign signature  
3 because it was drafted by ReedSmith and sent to him for signature.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 36.**

5 In addition to the General Objections set forth above, Rokoko objects that this  
6 Request fails to identify the “second declaration” with sufficient particularity, rendering  
7 the Request vague and ambiguous such that Rokoko is unable to formulate a response  
8 or otherwise admit in good faith. Rokoko further objects that this Request is improperly  
9 compound and overbroad as to time and scope. Rokoko further objects that to the extent  
10 that this Request seeks information protected by the work product doctrine, attorney-  
11 client privilege, or any other applicable privilege. Rokoko further objects that the  
12 methods by which Rokoko drafts litigation documents is not relevant to any claim or  
13 defense of any party to this action.

14 **REQUEST FOR ADMISSION NO. 37.**

15 Admit Defendant has made false statements before this Court.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 37.**

17 In addition to the General Objections set forth above, Rokoko objects that this  
18 Request is vague and ambiguous with respect to the term “statements.” Rokoko further  
19 objects to the extent that this Request is overbroad, unlimited as to time and scope,  
20 unduly burdensome, and harassing.

21 Subject to and without waiving any of its objections, Rokoko responds as  
22 follows: **Denied.**

23 **REQUEST FOR ADMISSION NO. 38.**

24 Admit Defendant has withheld or omitted facts from this Court.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 38.**

26 In addition to the General Objections set forth above, Rokoko objects that this  
27 Request is vague and ambiguous with respect to the term “statements.” Rokoko further  
28

1 objects that this Request is overbroad, unlimited as to time and scope, unduly  
2 burdensome, and harassing.

3 Subject to and without waiving any of its objections, Rokoko responds as  
4 follows: **Denied.**

5 **REQUEST FOR ADMISSION NO. 39.**

6 Admit that Defendant has sold or licensed motion capture animation or motion  
7 data to Snap Inc. (commonly known as SnapChat).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 39.**

9 In addition to the General Objections set forth above, Rokoko objects that this  
10 Request is vague and ambiguous with respect to the terms “sold” and “licensed” and  
11 the undefined terms “motion capture animation” and “motion data.” Rokoko further  
12 objects that this Request is overbroad and not limited as to scope or time. Rokoko  
13 further objects to the extent that this Request seeks confidential or proprietary  
14 information protected by trade secrets, the right to privacy, or other applicable privilege.  
15 Rokoko further objects that this Request is unduly burdensome and harassing insofar as  
16 it seeks confidential or financial information involving third-parties who are not a part  
17 of this action. Rokoko further objects that this Request seeks information not relevant  
18 to any claim or defense of any party to this action.

19 **REQUEST FOR ADMISSION NO. 40.**

20 Admit that Defendant, or any person acting on Defendant’s behalf, has made or  
21 caused to be made online statements or edits relating to Plaintiff or this case with the  
22 intent to limit or discourage Plaintiff from speaking publicly about this case.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 40.**

24 In addition to the General Objections set forth above, Rokoko objects that this  
25 Request is overbroad, particularly with respect to the terms “any person” and “has made  
26 or caused to be made. Rokoko further objects that this Request is unlimited as to scope,  
27 time, and subject matter, and improperly compound such that Rokoko is unable to  
28 formulate a response or otherwise admit in good faith. Rokoko further objects that this

1 Request seeks information not known to Rokoko, since it would require Rokoko to  
2 speculate as to the intent of persons or entities that this Request ambiguously and/or  
3 insufficiently defines. Rokoko further objects that this Request is vague and ambiguous  
4 with respect to the phrase “speaking publicly.”

5  
6 DATED: October 10, 2025

REED SMITH LLP

7  
8 By: /s/ Katherine J. Ellena  
9 Katherine J. Ellena  
10 Michael Galibois (*pro hac vice*)  
11 Emily Graue (*pro hac vice*)

12 *Attorneys for Defendant*  
13 *Rokoko Electronics*  
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VERIFICATION

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I, Mikkel Overby, declare:

I am the CFO and COO for Rokoko Electronics, Inc. and hereby affirm that I am authorized to make this verification on behalf of Rokoko. The information contained within **DEFENDANT ROKOKO ELECTRONICS’ RESPONSES AND OBJECTIONS TO PLAINTIFF’S SECOND SET OF REQUESTS FOR ADMISSION** are true and correct to the best of my personal knowledge, information, and/or belief, based upon my own information and information given to me by others after reasonable investigation. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Rokoko reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

DATED: October 10, 2025



Mikkel Overby

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**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On October 10, 2025, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S SECOND SET OF REQUESTS FOR ADMISSION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on October 10, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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

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

14 MATTHEW R. WALSH,  
15 Plaintiff,  
16 vs.  
17 ROKOKO ELECTRONICS, and  
18 DOES 1 through 50, inclusive,  
19 Defendant

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

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

**DEFENDANT ROKOKO  
ELECTRONICS' RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION**

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

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: ONE (1)

4 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant  
5 Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the following responses  
6 (“Responses”) to Plaintiff Matthew R. Walsh’s (“Plaintiff”) First Set of Requests for  
7 Production.

8 **PRELIMINARY STATEMENT**

9 This matter is in the early stages of discovery, and Defendant has not completed  
10 its investigation into this matter. Defendant therefore reserves the right to supplement,  
11 amend, or revise these Responses as additional information becomes available. The  
12 following responses are subject to all objections if such statements are offered in court,  
13 and all such objections are reserved and may be interposed at the time of trial or at any  
14 other time. Accordingly, Defendant provides this Response without prejudice to its right  
15 to use or produce at a later date evidence of any subsequently discovered documents,  
16 facts, or interpretations thereof. The fact that Defendant has answered any Request is  
17 not intended nor shall be construed to be a waiver by it of all or any part of any objection  
18 to any request.

19 Defendant makes no incidental or implied admissions by this Response.  
20 Accordingly, Plaintiff shall not construe Defendant’s Response or objections to any  
21 request as Defendant’s admissions that it accepts or admits the existence of any facts  
22 assumed by the request, and Plaintiff shall not construe Defendant’s Response or  
23 objection as admissible of evidence of any such assumed facts.

24 **GENERAL OBJECTIONS**

25 Any document provided in Response to Plaintiff’s Requests for Production of  
26 Documents is subject to any and all objections regarding the document’s competence,  
27 relevance, materiality, propriety, and admissibility. Defendant preserves these  
28 objections and other objections not stated herein that would support the exclusion of

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1 any document that is produced in discovery and later offered into evidence any time  
2 during this action. Defendant may interpose objections to the evidentiary use of any  
3 such document at any time during this action, including prior to and/or during the trial  
4 of this case.

5 To the extent any Request may be construed as seeking the disclosure of  
6 privileged or immune information, including without limitation, information subject to  
7 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
8 claims such privileges and/or immunities and objects to the Requests on those grounds.  
9 Further, Rokoko objects to any Request to the extent it calls for information that is  
10 subject to and protected by any other statutory and/or common-law privilege.  
11 Inadvertent disclosure of information subject to any privilege does not waive the  
12 privilege as to other information and/or documents regarding the same subject or  
13 content and does not waive Rokoko’s right to object to the introduction of such  
14 privileged information and/or documents regarding the same subject or content and  
15 does not waive Rokoko’s right to object to the introduction of such privileged  
16 information and/or documents into evidence.

17 To the extent these Requests demand the disclosure of information concerning  
18 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
19 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko’s  
20 attorneys.

21 Rokoko objects to these Requests to the extent that it seeks the disclosure of  
22 confidential commercial and/or proprietary information protected by the right of  
23 privacy, the trade secret privilege, and/or any other applicable protection. Rokoko  
24 objects to producing such information unless and until such production is subject to a  
25 suitable protective order entered in this case. Rokoko objects to the production of any  
26 information and/or documents that are subject to a confidentiality agreement with a  
27 third party or a court-ordered confidentiality agreement.

28

**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1.**

Produce all versions of Rokoko’s Terms of Service from January 1, 2020 to the present.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1.**

In addition to the General Objections set forth above, Rokoko objects to this Request to the extent that it is overbroad as to scope and time, and further objects that the request for “all versions” is impermissibly vague and ambiguous. Rokoko objects to the extent that this Request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible or relevant evidence.

Subject to and without waiving the foregoing objections, Rokoko responds as follows: Rokoko will produce responsive, non-privileged documents that are within its possession, custody, and control reflecting Rokoko’s Terms of Service from August 2020 to the present following an entered protective order governing discovery in this action.

**REQUEST FOR PRODUCTION NO. 2.**

Produce all internal communications, drafts, or notes concerning changes to Rokoko’s Terms of Service from January 1, 2020 to the present.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2.**

In addition to the General Objections set forth above, Rokoko objects to this Request to the extent that seeking “all internal communications, drafts, or notes” is impermissibly broad. Rokoko objects to this Request to the extent that it is not described with reasonable particularity. Rokoko further objects to the Request to the extent it seeks confidential or proprietary business information. Rokoko objects to the Request to the extent it calls for the disclosure of privileged or protected information, including without limitation, information subject to the attorney-client privilege, attorney work product doctrine, or any other statutory or common-law privilege.

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1 **REQUEST FOR PRODUCTION NO. 3.**

2 Produce all contracts, agreements, or memoranda of understanding between  
3 Rokoko and any third party concerning user animation data, anonymization, resale,  
4 licensing, or artificial intelligence/machine learning use, from January 1, 2020 to the  
5 present.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3.**

7 In addition to the General Objections set forth above, Rokoko objects to this  
8 Request to the extent that seeking “all contracts, agreements, or memoranda of  
9 understanding” is impermissibly broad. Rokoko further objects to the extent that  
10 “memoranda of understanding” is vague and ambiguous. Rokoko further objects to the  
11 extent that the Request seeks documents that are neither relevant to the subject matter  
12 of this action nor reasonably calculated to lead to the discovery of admissible evidence.  
13 Rokoko objects to this Request to the extent that it is not described with reasonable  
14 particularity. Rokoko further objects to the Request to the extent it seeks confidential  
15 or proprietary business information in which Rokoko and/or third parties have trade  
16 secret and/or privacy rights. Rokoko objects to the Request to the extent it calls for the  
17 disclosure of privileged or protected information, including without limitation,  
18 information subject to the attorney-client privilege, attorney work product doctrine, or  
19 any other statutory or common-law privilege. Rokoko further objects to this Request to  
20 the extent that it is unduly burdensome, oppressive and harassing.

21 **REQUEST FOR PRODUCTION NO. 4.**

22 Produce all contracts, agreements, or communications between Rokoko and  
23 Naver-Z (Zepeto) from January 1, 2020 to the present.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4.**

25 In addition to the General Objections set forth above, Rokoko objects to the  
26 Request to the extent that seeking “all contracts, agreements, or communications” is  
27 impermissibly broad. Rokoko further objects to the extent that that the Request seeks  
28 documents that are neither relevant to the subject matter of this action nor reasonably

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1 calculated to lead to the discovery of admissible evidence. Rokoko further objects that  
2 this Request is impermissibly burdensome and harassing insofar as it seeks documents  
3 involving confidential and proprietary information of third-parties not involved in this  
4 action. Rokoko objects to this Request to the extent that it is not described with  
5 reasonable particularity. Rokoko objects to the Request to the extent it calls for the  
6 disclosure of privileged or protected information, including without limitation,  
7 information subject to the attorney-client privilege, attorney work product doctrine, or  
8 any other statutory or common-law privilege.

9 **REQUEST FOR PRODUCTION NO. 5.**

10 Produce all documents sufficient to show Rokoko’s definition, process, and  
11 policies concerning “anonymization” of user animation data.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 Request to the extent that seeking “all documents” is impermissibly broad and not  
15 limited in time or scope. Rokoko further objects to the extent that the Request seeks  
16 documents that are neither relevant to the subject matter of this action nor reasonably  
17 calculated to lead to the discovery of admissible evidence. Rokoko objects to this  
18 Request to the extent that it is not described with reasonable particularity. Rokoko  
19 further objects to the Request to the extent it seeks confidential or proprietary business  
20 information. Rokoko objects to the Request to the extent it calls for the disclosure of  
21 privileged or protected information, including without limitation, information subject  
22 to the attorney-client privilege, attorney work product doctrine, or any other statutory  
23 or common-law privilege. Rokoko objects to this Request to the extent that it is not  
24 described with reasonable particularity.

25 **REQUEST FOR PRODUCTION NO. 6.**

26 Produce all technical specifications, schemas, or documentation describing the  
27 structure of user animation data files created in Rokoko Studio from January 1, 2020 to  
28 the present.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 Request to the extent that seeking “all technical specifications, schemas, or  
4 documentation” is impermissibly broad. Rokoko further objects to the extent that the  
5 undefined phrases “technical specifications” and “schemas” are vague and ambiguous.  
6 Rokoko further objects to the extent that the Request seeks documents that are neither  
7 relevant to the subject matter of this action nor reasonably calculated to lead to the  
8 discovery of admissible evidence. Rokoko further objects to the Request to the extent it  
9 seeks confidential or proprietary business information. Rokoko objects to the Request  
10 to the extent it calls for the disclosure of privileged or protected information, including  
11 without limitation, information subject to the attorney-client privilege, attorney work  
12 product doctrine, or any other statutory or common-law privilege. Rokoko objects to  
13 this Request to the extent that it is not described with reasonable particularity.

14 **REQUEST FOR PRODUCTION NO. 7.**

15 Produce all documents, communications, or data reflecting Rokoko’s collection  
16 or modification of copyright management information (“CMI”) in connection with user  
17 animation data.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7.**

19 In addition to the General Objections set forth above, Rokoko objects to this  
20 Request to the extent that seeking “all documents, communications, or data” is  
21 impermissibly broad. Rokoko objects to this Request to the extent that it is not described  
22 with reasonable particularity. Rokoko further objects to the extent that the Request seeks  
23 documents that are neither relevant to the subject matter of this action nor reasonably  
24 calculated to lead to the discovery of admissible evidence. Rokoko further objects to  
25 the Request to the extent it seeks confidential or proprietary business information.  
26 Rokoko objects to the Request to the extent it calls for the disclosure of privileged or  
27 protected information, including without limitation, information subject to the attorney-

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1 client privilege, attorney work product doctrine, or any other statutory or common-law  
2 privilege.

3 **REQUEST FOR PRODUCTION NO. 8.**

4 Produce all documents or communications concerning Rokoko’s use of user  
5 animation data, with or without CMI, for artificial intelligence or machine learning  
6 purposes.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8.**

8 In addition to the General Objections set forth above, Rokoko objects to the  
9 extent that the Request for “all documents or communications” is overbroad and unduly  
10 burdensome. Rokoko further objects to this Request insofar as the phrases “use of user  
11 animation data,” “with or without CMI,” and “artificial intelligence or machine learning  
12 purposes” are vague and ambiguous such that they are not reasonably calculated to lead  
13 to the discovery of admissible evidence. Rokoko further objects to the extent that this  
14 Request seeks confidential or proprietary information protected by the right to privacy  
15 or applicable trade privileges. Rokoko objects to the Request to the extent it calls for  
16 the disclosure of privileged or protected information, including without limitation,  
17 information subject to the attorney-client privilege, attorney work product doctrine, or  
18 any other statutory or common-law privilege.

19 **REQUEST FOR PRODUCTION NO. 9.**

20 Produce all documents sufficient to show the categories of telemetry, logs,  
21 animation data or technical data collected by Rokoko Studio in connection with  
22 Plaintiff’s use of Rokoko’s products or services.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9.**

24 In addition to the General Objections set forth above, Rokoko objects that this  
25 Request is vague and ambiguous with regards to the terms “animation data,” “technical  
26 data” and “use of Rokoko’s products or services.” Rokoko further objects that this  
27 Request is overbroad as to scope and time, such that it is not reasonably calculated to  
28 lead to the discovery of admissible evidence. Rokoko further objects to the extent that

1 this Request seeks confidential or proprietary information protected by the right to  
2 privacy or applicable trade privileges. Rokoko further objects that this Request seeks  
3 documents already in the possession, custody, or control of Plaintiff.

4 **REQUEST FOR PRODUCTION NO. 10.**

5 Produce all internal communications concerning Plaintiff’s requests to provide  
6 replacement parts, repairs or replacement from September 2024 through April 2025.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10.**

8 In addition to the General Objections set forth above, Rokoko objects to the  
9 Request to the extent that seeking “all internal communications” is impermissibly  
10 broad. Rokoko further objects to the extent that the Request seeks documents that are  
11 neither relevant to the subject matter of this action nor reasonably calculated to lead to  
12 the discovery of admissible evidence. Rokoko further objects to the Request to the  
13 extent it seeks confidential or proprietary business information. Rokoko objects to the  
14 Request to the extent it calls for the disclosure of privileged or protected information,  
15 including without limitation, information subject to the attorney-client privilege,  
16 attorney work product doctrine, or any other statutory or common-law privilege.

17 **REQUEST FOR PRODUCTION NO. 11.**

18 Produce all marketing materials, investor presentations, pitch decks, or websites  
19 that list Rokoko’s number of employees or “teams worldwide” from January 1, 2020 to  
20 the present.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11.**

22 In addition to the General Objections set forth above, Rokoko objects to the  
23 Request to the extent that seeking “all marketing materials, investor presentations, pitch  
24 decks, or websites” is impermissibly broad. Rokoko further objects to the extent that  
25 this Request seeks documents that are neither relevant to the subject matter of this action  
26 nor reasonably calculated to lead to the discovery of admissible evidence. Rokoko  
27 further objects to this Request to the extent it seeks confidential or proprietary business  
28 information. Rokoko objects to this Request to the extent it calls for the disclosure of

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1 privileged or protected information, including without limitation, information subject  
2 to the attorney-client privilege, attorney work product doctrine, or any other statutory  
3 or common-law privilege. Rokoko further objects to the extent that the Request for  
4 “websites” is unduly burdensome and harassing insofar as it seeks information equally  
5 accessible to Plaintiff.

6 **REQUEST FOR PRODUCTION NO. 12.**

7 Produce documents sufficient to show the number of Rokoko employees, board  
8 members, contractors in California and Delaware, respectively from January 1, 2020 to  
9 the present.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12.**

11 In addition to the General Objections set forth above, Rokoko objects to the  
12 extent that the Request seeks documents that are neither relevant to the subject matter  
13 of this action nor reasonably calculated to lead to the discovery of admissible evidence.  
14 Plaintiff acquiesced to the jurisdiction of this Court in his Notice of Partial Withdrawal  
15 of Motion. Rokoko further objects to the Request to the extent it seeks confidential or  
16 proprietary business information. Rokoko objects to the Request to the extent it calls  
17 for the disclosure of privileged or protected information, including without limitation,  
18 information subject to the attorney-client privilege, attorney work product doctrine, or  
19 any other statutory or common-law privilege. Rokoko further objects to the extent that  
20 this Request is duplicative of Request No. 11.

21 **REQUEST FOR PRODUCTION NO. 13.**

22 Produce all corporate governance documents, including shareholder registers,  
23 board minutes, or consents, reflecting Trifork’s ownership interest in Rokoko  
24 Electronics or Rokoko Care (“CoCo”).

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13.**

26 In addition to the General Objections set forth above, Rokoko objects to the  
27 Request to the extent that seeking “all corporate governance documents, including  
28 shareholder registers, board minutes, or consents” is impermissibly broad. Rokoko

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1 further objects to the extent that the phrases “governance documents” and “consents”  
2 are vague and ambiguous. Rokoko further objects to the extent that the Request seeks  
3 documents that are neither relevant to the subject matter of this action nor reasonably  
4 calculated to lead to the discovery of admissible evidence. Rokoko further objects to  
5 the Request to the extent it seeks confidential or proprietary business information.  
6 Rokoko objects to the Request to the extent it calls for the disclosure of privileged or  
7 protected information, including without limitation, information subject to the attorney-  
8 client privilege, attorney work product doctrine, or any other statutory or common-law  
9 privilege. Rokoko further objects that a non-party’s ownership interest in Rokoko is in  
10 no way related to any of Plaintiff’s claims, such that the Request is unduly burdensome,  
11 harassing, and not reasonably calculated to lead to the discovery of admissible evidence.

12 **REQUEST FOR PRODUCTION NO. 14.**

13 Produce all **non-privileged documents** concerning the preparation, drafting, or  
14 execution of the declarations of Mikkel Overby or Katherine J. Ellena filed in this  
15 action, and provide a privilege log identifying any withheld documents.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14.**

17 In addition to the General Objections set forth above, Rokoko objects to the  
18 Request to the extent it calls for the disclosure of privileged or protected information,  
19 including without limitation, information subject to the attorney-client privilege,  
20 attorney work product doctrine, or any other statutory or common-law privilege.  
21 Rokoko further objects that this Request is clearly harassing insofar as it seeks to  
22 uncover Rokoko’s attorney work product, completely divorced from any relevance to  
23 Plaintiffs claims. Rokoko further objects that this Request is not reasonably calculated  
24 to lead to the discovery of admissible evidence.

25 **REQUEST FOR PRODUCTION NO. 15.**

26 Provide documents sufficient to show employee rosters and active employee  
27 counts for each year worldwide beginning in 2020 to present day.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15.**

2 In addition to the General Objections set forth above, Rokoko objects that the  
3 request for documents that “show employee rosters and active employee counts” is  
4 vague, overbroad, and unduly burdensome. Rokoko further objects to the extent that  
5 this Request seeks confidential and proprietary information. Rokoko further objects  
6 insofar as this Request seeks the discovery of irrelevant, private employment  
7 information belonging to third-parties, i.e. Rokoko employees and agents. Rokoko  
8 further objects to the extent that this Request is duplicative of Request No. 11.

9 **REQUEST FOR PRODUCTION NO. 16.**

10 Produce all organizational charts, corporate structures, or shareholder listings for  
11 Rokoko Electronics and Rokoko Care (“CoCo”) from January 1, 2020 to the present.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16.**

13 In addition to the General Objections set forth above, Rokoko objects to the  
14 extent that the Request for “all organizational charts, corporate structures, or  
15 shareholder listings” is overbroad as to scope. Rokoko further objects to the extent that  
16 this Request is vague and ambiguous with respect to the terms “organizational charts,”  
17 “corporate structures,” or “shareholder listings.” Rokoko further objects to the extent  
18 that this Request is harassing and unduly burdensome insofar as it seeks the discovery  
19 of documents with no relevance to Plaintiff’s claims.

20 **REQUEST FOR PRODUCTION NO. 17.**

21 Produce all documents, contracts, communications, or marketing materials  
22 concerning Rokoko’s resale, licensing, or use of user animation data by third parties.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17.**

24 In addition to the General Objections set forth above, Rokoko objects to the  
25 extent that the Request for “all documents, contracts, communications, or marketing  
26 materials concerning. . . resale, licensing, or use of user animation data” is compound,  
27 overbroad as to scope and time, and overall exemplary of a “fishing expedition” that is  
28 not properly tailored to lead to the discovery of admissible evidence. Rokoko objects to

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1 the extent that this Request fails to describe the documents sought with sufficient detail  
2 such that responsive documents can be located. Rokoko further objects to the extent that  
3 this Request seeks documents that are wholly irrelevant to Plaintiff’s claims. Rokoko  
4 further objects to the extent that this Request seeks confidential or proprietary  
5 information. Rokoko further objects to this Request to the extent it seeks information  
6 protected by the attorney-client privilege and the work product doctrine.

7 **REQUEST FOR PRODUCTION NO. 18.**

8 Produce all communications to users or potential users in which Rokoko stated,  
9 suggested, or implied that user animation data could be resold, licensed, anonymized,  
10 or used for AI/ML purposes.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18.**

12 In addition to the General Objections set forth above, Rokoko objects to the  
13 extent that “all communications” to “users or potential users” is overbroad as to time  
14 and scope, vague, and unduly burdensome. Rokoko further objects to the extent that the  
15 Request for production of “communications. . . in which Rokoko state, suggested, or  
16 implied” is similarly overbroad as to time and scope, vague, and unduly burdensome.  
17 Rokoko further objects to this Request the extent that it presumes such communications  
18 exist. Rokoko further objects to the extent that this Request is vague and ambiguous as  
19 to the terms “resold,” “relicensed,” and “used,” and the undefined term “AI/ML  
20 purposes.” Rokoko further objects to the extent that this request seeks confidential  
21 information in which Rokoko and/or third parties may have proprietary, trade secret,  
22 and/or privacy rights. Rokoko further objects to the extent that this Request as written  
23 seeks the production of a large volume of documents that are wholly irrelevant, such  
24 that the Request is harassing and not sufficiently tailored to lead to the discovery of  
25 admissible evidence. Rokoko further objects to this Request to the extent it seeks  
26 information protected by the attorney-client privilege and the work product doctrine.

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1 **REQUEST FOR PRODUCTION NO. 19.**

2 Produce documents sufficient to show all categories of data, logs, or information  
3 maintained by Rokoko concerning Plaintiff, including but not limited to telemetry,  
4 project data, biometric data, copyright management information (“CMI”), and  
5 animation data. With respect to animation data, Plaintiff does not request the content of  
6 the files but does request documents sufficient to show the quantity (e.g., number of  
7 files or total byte size per file) stored.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19.**

9 In addition to the General Objections set forth above, Rokoko objects to the  
10 extent that the Request for “*all* categories of data, logs, or information. . . including but  
11 limited to telemetry, project data, biometric data, [CMI], and animation data” is  
12 overbroad as to scope and time, vague, and ambiguous. Rokoko further objects to the  
13 extent that this Request is unduly burdensome and harassing. Rokoko further objects to  
14 this Request to the extent it seeks confidential information in which Rokoko and/or third  
15 parties may have proprietary, trade secret and/or privacy rights. Rokoko further objects  
16 to this Request to the extent it seeks information protected by the attorney-client  
17 privilege and the work product doctrine.

18 **REQUEST FOR PRODUCTION NO. 20.**

19 Produce any and all investor pitch decks from 2020 to present.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20.**

21 In addition to the General Objections set forth above, Rokoko objects that the  
22 Request for “any and all” documents is overbroad as to scope. Rokoko further objects  
23 to this Request to the extent it seeks confidential information in which Rokoko and/or  
24 third parties may have proprietary, trade secret and/or privacy rights. Rokoko further  
25 objects to the extent that this Request seeks the production of documents involving  
26 wholly irrelevant communications with non-parties, such that the Request is not  
27 reasonably tailored to lead to the discovery of admissible evidence. Rokoko further  
28 objects to this Request to the extent it seeks documents outside of Rokoko’s possession,

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1 custody, and control. Rokoko further objects to this Request to the extent it seeks  
2 information protected by the attorney-client privilege and the work product doctrine.

3 **REQUEST FOR PRODUCTION NO. 21.**

4 Produce all communications, including emails and presentations, from January  
5 1, 2020 to the present, concerning the intentions described in any Rokoko investor pitch  
6 decks to resell or otherwise monetize user content or user animation data.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21.**

8 In addition to the General Objections set forth above, Rokoko objects to the  
9 extent that the Request for “all communications” is overbroad as to scope. Rokoko  
10 further objects to the extent that this Request is vague and ambiguous as to the terms  
11 “intentions,” “resell,” “monetize” and “user content.” Rokoko further objects to this  
12 Request to the extent it seeks confidential information in which Rokoko and/or third  
13 parties may have proprietary, trade secret and/or privacy rights. Rokoko further objects  
14 that this Request is unduly burdensome and harassing insofar as it presumes Rokoko’s  
15 intentions, seeks the discovery of communications that are wholly irrelevant to  
16 Plaintiff’s claims, and fails to identify documents in a way that would enable Rokoko  
17 to locate responsive documents. Rokoko further objects to this Request to the extent it  
18 seeks information protected by the attorney-client privilege and the work product  
19 doctrine.

21 DATED: October 10, 2025

REED SMITH LLP

23 By: /s/ Katherine J. Ellena  
Katherine J. Ellena  
Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

25 *Attorneys for Defendant*  
26 *Rokoko Electronics*

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**VERIFICATION**

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I, Mikkel Overby, declare:

I am the CFO and COO for Rokoko Electronics, Inc. (“Rokoko”) and hereby affirm that I am authorized to make this verification on behalf of Rokoko. The information contained within **DEFENDANT ROKOKO ELECTRONICS’ RESPONSES AND OBJECTIONS TO PLAINTIFF’S FIRST SET OF REQUESTS FOR PRODUCTION** are true and correct to the best of my personal knowledge, information, and/or belief, based upon my own information and information given to me by others after reasonable investigation. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Rokoko reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

DATED: October 10, 2025



Mikkel Overby

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**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On October 10, 2025, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on October 10, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

REED SMITH LLP  
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1 Katherine J. Ellena (SBN 324160)  
kellena@reedsmith.com  
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3 Los Angeles, CA 90071-1514  
Telephone: +1 213 457 8000  
4 Facsimile: +1 213 457 8080

5 Michael B. Galibois (*pro hac vice*)  
mgalibois@reedsmith.com  
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10 South Wacker Drive, 40th Floor  
8 Chicago, IL 60606-7507  
Telephone: +1 312.207 1000  
9 Facsimile: +1 312.207 6400

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

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

14 MATTHEW R. WALSH,  
15 Plaintiff In Pro Per,  
16 vs.  
17 ROKOKO ELECTRONICS, and DOES 1  
18 THROUGH 50, inclusive)  
19 Defendant

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

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

**DEFENDANT ROKOKO  
ELECTRONICS' RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
SECOND SET OF REQUESTS FOR  
PRODUCTION**

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: TWO (2)

4 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant  
5 Rokoko Electronics (“Defendant” or “Rokoko”) hereby makes the following responses  
6 (“Responses”) to Plaintiff Matthew R. Walsh’s (“Plaintiff”) Second Set of Requests for  
7 Production.

8 **PRELIMINARY STATEMENT**

9 This matter is in the early stages of discovery, and Defendant has not completed  
10 its investigation into this matter. Defendant therefore reserves the right to supplement,  
11 amend, or revise these Responses as additional information becomes available. The  
12 following Responses are subject to all objections if such statements are offered in court,  
13 and all such objections are reserved and may be interposed at the time of trial or at any  
14 other time. Accordingly, Defendant provides this Response without prejudice to its right  
15 to use or produce at a later date evidence of any subsequently discovered documents,  
16 facts, or interpretations thereof. The fact that Defendant has answered any Request is  
17 not intended nor shall be construed to be a waiver by it of all or any part of any objection  
18 to any request.

19 Defendant makes no incidental or implied admissions by this Response.  
20 Accordingly, Plaintiff shall not construe Defendant’s Response or objections to any  
21 request as Defendant’s admissions that it accepts or admits the existence of any facts  
22 assumed by the request, and Plaintiff shall not construe Defendant’s Response or  
23 objection as admissible of evidence of any such assumed facts.

24 **GENERAL OBJECTIONS**

25 Any document provided in Response to Plaintiff’s Requests for Production of  
26 Documents is subject to any and all objections regarding the document’s competence,  
27 relevance, materiality, propriety, and admissibility. Defendant preserves these  
28 objections and other objections not stated herein that would support the exclusion of

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1 any document that is produced in discovery and later offered into evidence any time  
2 during this action. Defendant may interpose objections to the evidentiary use of any  
3 such document at any time during this action, including prior to and/or during the trial  
4 of this case.

5 To the extent any Request may be construed as seeking the disclosure of  
6 privileged or immune information, including without limitation, information subject to  
7 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
8 claims such privileges and/or immunities and objects to the Requests on those grounds.  
9 Further, Rokoko objects to any Request to the extent it calls for information that is  
10 subject to and protected by any other statutory and/or common-law privilege.  
11 Inadvertent disclosure of information subject to any privilege does not waive the  
12 privilege as to other information and/or documents regarding the same subject or  
13 content and does not waive Rokoko's right to object to the introduction of such  
14 privileged information and/or documents regarding the same subject or content and  
15 does not waive Rokoko's right to object to the introduction of such privileged  
16 information and/or documents into evidence.

17 To the extent these Requests demand the disclosure of information concerning  
18 the legal basis of its defense, Rokoko objects on the grounds that these Requests call  
19 for mental impressions, conclusions, opinions, and/or legal theories of Rokoko's  
20 attorneys.

21 Rokoko objects to these Requests on the grounds that they seeks the disclosure  
22 of confidential commercial and/or proprietary information protected by the right of  
23 privacy, the trade secret privilege, and/or any other applicable protection. Rokoko  
24 objects to producing such information unless and until such production is subject to a  
25 suitable protective order entered in this case. Rokoko objects to the production of any  
26 information and/or documents that are subject to a confidentiality agreement with a  
27 third party or a court-ordered confidentiality agreement.

28

**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1.**

Produce all deeds, leases, floor plans and authenticated interior pictures sufficient to prove Rokoko’s “HQ” is in fact 886.4 square meters and staffed daily.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Request seeks information irrelevant to Plaintiff’s claims, and is therefore unduly burdensome, harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Rokoko further objects to this extent that the Request is vague and ambiguous as phrased, insofar as it presumes that such documents proving the square footage and staffing are in the possession, custody, or control of Rokoko. Rokoko further objects to this extent that this Request is overbroad as to scope and time.

**REQUEST FOR PRODUCTION NO. 2.**

Produce all deeds, leases, floor plans and authenticated interior pictures for the basement unit.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2.**

In addition to the General Objections set forth above, Rokoko objects that to this extent this Request seeks information irrelevant to Plaintiff’s claims, and is therefore unduly burdensome, harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Rokoko further objects to this extent that the Request for “all” documents without limitation to scope or time is impermissibly broad. Rokoko further objects to this extent that this Request is vague and ambiguous with respect to the term “basement unit,” such that Rokoko is unable to ascertain what documents would be responsive to this Request.

**REQUEST FOR PRODUCTION NO. 3.**

Produce the most recent bank statement for each of the following entities: Rokoko Electronics Inc., Rokoko LLC (Delaware), Rokoko Care ApS, Rokoko Electronics ApS, CoCo Care ApS, and any subsidiary, affiliate, or successor thereof.

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1 Each statement must show, at minimum, the financial institution name, account type,  
2 account number (last four digits), and current balance of every account held. This  
3 request cannot be satisfied by an assertion that no such statement exists, as a statement  
4 necessarily exists for any active account.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3.**

6 In addition to the General Objections set forth above, Rokoko objects to this  
7 extent that this request is unduly burdensome and harassing insofar as it seeks and  
8 confidential financial information. Rokoko further objects to the extent that the Request  
9 seeks documents that are neither relevant to the subject matter of this action nor  
10 reasonably calculated to lead to the discovery of admissible evidence. Rokoko further  
11 objects to this extent that this Request seeks the production of confidential financial  
12 documents and information regarding non-parties to this litigation.

13 **REQUEST FOR PRODUCTION NO. 4.**

14 Produce all documents sufficient to identify each attorney of record for  
15 Defendant who possesses technical expertise enough to testify in any of the following  
16 subject areas: C# programming; C/C++ programming; microcontroller development;  
17 multi-threading; parallel development; man-in-the-middle (MITM) attacks; packet  
18 sniffing; computer networking; metadata extraction; binary executable decompilation;  
19 reverse engineering; systems architecture and design; Microsoft Intermediate Language  
20 (MSIL); source code obfuscation or deobfuscation; and knowledge of protocols  
21 including, but not limited to, HTTP, HTTPS, WebSockets, TCP/IP, and UDP. Such  
22 documents shall include, without limitation, resumes, curricula vitae, professional  
23 biographies, or other materials sufficient to show the claimed expertise; if none – simply  
24 mark “No experience”.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4.**

26 In addition to the General Objections set forth above, Rokoko objects to this  
27 extent that this Request is vague and ambiguous such that categories of documents  
28 responsive to this Request cannot be identified. Rokoko further objects to the extent that

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1 this Request seeks the production of documents protected by the attorney-client  
2 privilege, work product privilege, or other applicable privilege. Rokoko further objects  
3 to this extent this Request is unduly burdensome and harassing. Rokoko further objects  
4 to the extent that the Request seeks documents that are neither relevant to the subject  
5 matter of this action nor reasonably calculated to lead to the discovery of admissible  
6 evidence.

7 **REQUEST FOR PRODUCTION NO. 5.**

8 Produce all intercompany agreements, loans, or transfers between Rokoko  
9 Electronics Inc., Rokoko LLC, Rokoko Care ApS, and related entities, sufficient to  
10 show commingling of funds and alter ego operation.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5.**

12 In addition to the General Objections set forth above, Rokoko objects to the  
13 extent that this Request is overbroad, vague, and ambiguous. Rokoko further objects  
14 that the Request for “all” documents, without limitation to scope or time, is not  
15 reasonably tailored to lead to the discovery of admissible evidence. Rokoko further  
16 objects to the extent that this Request seeks confidential information in which Rokoko  
17 and/or third parties may have proprietary and/or privacy rights. Rokoko further objects  
18 to the extent that this Request is vague and ambiguous with respect to the terms  
19 “commingling” and “alter ego.” Rokoko further objects to the extent that this Request  
20 merely seeks to uncover private financial data unrelated to the litigation at hand, and is  
21 therefore unduly burdensome and harassing. Rokoko further objects to the extent that  
22 the Request seeks documents that are neither relevant to the subject matter of this action  
23 nor reasonably calculated to lead to the discovery of admissible evidence.

24 **REQUEST FOR PRODUCTION NO. 6.**

25 Produce all communications, drafts, or postings made by Defendant, its  
26 employees, agents, or counsel concerning Plaintiff or this litigation on Reddit, Discord,  
27 or any other online forum.

28

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent that this Request for “all communications, drafts, or postings” without limitation  
4 to scope or time is impermissibly overbroad and not reasonably tailored to lead to the  
5 discovery of admissible evidence. Rokoko further objects to the extent that this Request  
6 is vague and ambiguous with respect to the terms “communications,” “drafts,”  
7 “postings,” and “online forum.” Rokoko further objects to the extent that this Request  
8 seeks documents that are not in Rokoko’s possession, custody, or control. Rokoko  
9 further objects to this Request to the extent that it seeks the discovery of publicly  
10 available documents or documents that are equally accessible to Plaintiff, rendering this  
11 Request harassing and unduly burdensome. Rokoko further objects to the extent that  
12 the Request seeks documents that are neither relevant to the subject matter of this action  
13 nor reasonably calculated to lead to the discovery of admissible evidence.

14 **REQUEST FOR PRODUCTION NO. 7.**

15 Produce all communications, support tickets, or refund requests from 2020 to  
16 present concerning the following issues: sensor failures, malfunctioning sensors,  
17 firmware issues, wiring issues, or complete suit failures.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7.**

19 In addition to the General Objections set forth above, Rokoko objects that the  
20 Request for “all communications” is impermissibly broad. Rokoko further objects to  
21 the extent that this Request seeks confidential information in which Rokoko and/or third  
22 parties may have proprietary, trade secret and/or privacy rights. Rokoko further objects  
23 to the Request to the extent it calls for the disclosure of privileged or protected  
24 information, including without limitation, information subject to the attorney-client  
25 privilege, attorney work product doctrine, or any other statutory or common-law  
26 privilege. Rokoko further objects to the extent that the Request seeks documents that  
27 are neither relevant to the subject matter of this action nor reasonably calculated to lead  
28 to the discovery of admissible evidence.

1 **REQUEST FOR PRODUCTION NO. 8.**

2 Produce all communications from customers, vendors, or partners that reference  
3 Defendant’s changes to its Terms and Conditions in or about March 2025, including but  
4 not limited to references to monetization of user intellectual property, collection of user  
5 intellectual property, or resale of user intellectual property to third parties.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8.**

7 In addition to the General Objections set forth above, Rokoko objects that the  
8 Request for “all communications” is impermissibly broad. Rokoko further objects to  
9 the extent this Request seeks confidential information in which Rokoko and/or third  
10 parties may have proprietary and/or privacy rights. Rokoko further objects to the  
11 Request to the extent it calls for the disclosure of privileged or protected information,  
12 including without limitation, information subject to the attorney-client privilege,  
13 attorney work product doctrine, or any other statutory or common-law privilege.  
14 Rokoko further objects to the extent that this Request is unduly burdensome and not  
15 reasonably tailored to lead to the discovery of admissible evidence. Rokoko further  
16 objects to the extent that the Request seeks documents that are neither relevant to the  
17 subject matter of this action nor reasonably calculated to lead to the discovery of  
18 admissible evidence.

20 DATED: October 10, 2025

REED SMITH LLP

22 By: /s/ Katherine J. Ellena  
Katherine J. Ellena  
23 Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

24 *Attorneys for Defendant*  
25 *Rokoko Electronics*

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VERIFICATION

I, Mikkel Overby, declare:

I am the CFO and COO for Rokoko Electronics, Inc. and hereby affirm that I am authorized to make this verification on behalf of Rokoko. The information contained within **DEFENDANT ROKOKO ELECTRONICS’ RESPONSES AND OBJECTIONS TO PLAINTIFF’S SECOND SET OF REQUESTS FOR PRODUCTION** are true and correct to the best of my personal knowledge, information, and/or belief, based upon my own information and information given to me by others after reasonable investigation. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Rokoko reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

DATED: October 10, 2025



Mikkel Overby

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**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On October 10, 2025, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on October 10, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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1 Katherine J. Ellena (SBN 324160)  
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5 Michael B. Galibois (*pro hac vice*)  
mgalibois@reedsmith.com  
6 Emily Graue (*pro hac vice*)  
egraue@reedsmith.com  
7 REED SMITH LLP  
10 South Wacker Drive, 40th Floor  
8 Chicago, IL 60606-7507  
Telephone: +1 312.207 1000  
9 Facsimile: +1 312.207 6400

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

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

14 MATTHEW R. WALSH,  
15 Plaintiff,  
16 vs.

17 ROKOKO ELECTRONICS, and  
18 DOES 1 through 50, inclusive,  
19 Defendant

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

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

**DEFENDANT ROKOKO  
ELECTRONICS' RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
FIRST SET OF  
INTERROGATORIES**

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1 PROPOUNDING PARTY: Plaintiff MATTHEW R. WALSH  
2 RESPONDING PARTY: Defendant ROKOKO ELECTRONICS  
3 SET NO.: ONE (1)

4 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure Rule  
5 Defendant, Rokoko Electronics (“Defendant” or “Rokoko”) hereby responds the First  
6 Set of Special Interrogatories (“Interrogatories”) propounded by Plaintiff Matthew R.  
7 Walsh (“Plaintiff”).

8 **PRELIMINARY STATEMENT**

9 Defendant has not fully completed its investigation of the facts and circumstances  
10 relating to this case. Defendant’s responses (“Responses”) herein are based only upon  
11 current information and documents known to this Rokoko and disclose only those  
12 contentions which presently occur to such Rokoko. It is anticipated that further  
13 discovery, independent investigation, legal research, and analysis will supply additional  
14 facts, add meaning to known facts, as well as establish entirely new factual conclusions  
15 and legal contentions, all of which may lead to substantial additions to, change in and  
16 variations from the contentions set forth herein.

17 The following Responses are given without prejudice to Defendant’s right to  
18 produce evidence of any subsequently discovered fact or facts which Defendant may  
19 later obtain or recall. Rokoko accordingly reserves its right to change, supplement,  
20 amend, or modify any and all Responses herein as additional facts are ascertained,  
21 analyses are made, legal research is completed, and contentions are made. Since  
22 discovery, investigation and trial preparation are currently in progress and have not yet  
23 been completed, the foregoing Responses shall in no way be construed to prohibit or  
24 limit this answering party from producing new or additional documents, facts or  
25 evidence or producing new or additional facts, contentions or theories at subsequent  
26 hearings or at the time of trial if such new or additional information later becomes  
27 available.

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1 The Responses contained herein are made in good faith effort to supply as much  
2 factual information and as much specification of legal contentions as are presently  
3 known, but should in no way be to the prejudice of the Defendant in relation to further  
4 discovery, research, or analysis.

5 **GENERAL OBJECTIONS**

6 Each of the following Responses is subject to all objections as to relevance,  
7 materiality, propriety, and admissibility and any and all objections and ground that  
8 would result in the exclusion of any statement therein if the Interrogatories were asked  
9 of or any statement or omission contained herein was made by a witness present and  
10 testifying in court. The Defendant reserves the right to assert all objections and grounds  
11 against the admissibility of any Response, in whole or in part, that may be asserted at  
12 the time of trial.

13 To the extent any Interrogatories may be construed as seeking the disclosure of  
14 privileged or immune information, including without limitation, information subject to  
15 the attorney-client privilege and/or the attorney work product doctrine, Rokoko hereby  
16 claims such privileges and/or immunities and objects to the Interrogatories on those  
17 grounds. Further, Rokoko objects to any Interrogatories to the extent it calls for  
18 information that is subject to and protected by any other statutory and/or common-law  
19 privilege. Inadvertent disclosure of information subject to any privilege does not waive  
20 the privilege as to other information and/or documents regarding the same subject or  
21 content and does not waive Rokoko’s right to object to the introduction of such  
22 privileged information and/or documents regarding the same subject or content and  
23 does not waive Rokoko’s right to object to the introduction of such privileged  
24 information and/or documents into evidence.

25 To the extent these Interrogatories demand the disclosure of information  
26 concerning the legal basis of its defense, Rokoko objects on the grounds that these  
27 Interrogatories call for mental impressions, conclusions, opinions, and/or legal theories  
28 of Rokoko’s attorneys.

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**DEFENDANT’S OBJECTIONS TO PLAINTIFF’S INTERROGATORIES**

**INTERROGATORY NO. 1.**

Identify all shareholders who currently hold an equity interest in Rokoko Electronics or Rokoko Care (“CoCo”), including the percentage interest held.

**RESPONSE TO INTERROGATORY NO. 1.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Interrogatory is vague and ambiguous as to the term “shareholders” and “equity interest,” overbroad as to scope, and not reasonably calculated to lead to the discovery of admissible evidence. Rokoko further objects to the extent this Interrogatory seeks confidential or proprietary information, including related to third-parties. Rokoko further objects to the extent that this Interrogatory seeks information that is not relevant to any of Plaintiff’s claims and is therefore unduly burdensome and harassing.

**INTERROGATORY NO. 2.**

Identify all contracts or agreements from January 2020 to the present in which Rokoko has or will use, sell, license, or transfer user-derived animation data (including AI derivatives) to any third party, including the recipient and the purpose.

**RESPONSE TO INTERROGATORY NO. 2.**

In addition to the General Objections set forth above, Rokoko objects to the extent that this Interrogatory is overbroad as to time. Rokoko further objects to the extent that this Interrogatory seeks “all contracts or agreements” where “Rokoko has or will use, sell, license, or transfer” information to “any third party,” which is overbroad as to subject matter, not reasonably tailored to the claims at issue, and would create an excessive and undue burden on Rokoko. Rokoko further objects to the extent that this Interrogatory would require Rokoko to undergo an extensive, impractical, and disproportionate search for information not relevant to the claims of any party to this action. Rokoko further objects to the extent that this Interrogatory seeks confidential or proprietary information involving third parties who are not a part of this litigation.

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1 **INTERROGATORY NO. 3.**

2 Describe in detail the definition, purpose, and process of “anonymization” as  
3 used by Rokoko in connection with user animation data, including any circumstances  
4 under which copyright management information (“CMI”) is altered, removed, or  
5 retained.

6 **RESPONSE TO INTERROGATORY NO. 3.**

7 In addition to the General Objections set forth above, Rokoko objects that this  
8 Interrogatory is compound, insofar as it requests that Rokoko (1) define, (2) state the  
9 purpose of, and (3) describe the process of “anonymization.” Rokoko further objects  
10 that this Interrogatory seeks confidential, proprietary, or trade secret information not  
11 relevant to the claims.

12 **INTERROGATORY NO. 4.**

13 Identify each request by Plaintiff for replacement parts or repairs that Rokoko  
14 denied from January 1, 2020 to the present, including the date of the request, the  
15 individual(s) who denied it, and the stated reason for the denial.

16 **RESPONSE TO INTERROGATORY NO. 4.**

17 In addition to the General Objections set forth above, Rokoko objects to the  
18 extent that this Interrogatory is vague and ambiguous with respect to the terms  
19 “replacement parts” and “repairs.” Rokoko further objects to the extent that this  
20 Interrogatory is unduly burdensome and harassing insofar as it seeks information that  
21 is equally accessible to Plaintiff or otherwise already available to Plaintiff.

22 **INTERROGATORY NO. 5.**

23 Describe in detail the technical structures of user animation data files created in  
24 Rokoko Studio from January 1, 2020 to the present, including the fields of metadata  
25 and copyright management information (“CMI”), and identifying whether such files  
26 contain (a) author or actor names, (b) biometric information, (c) device or hardware  
27 identifiers, (d) project names, or (e) any other uniquely identifiable information.

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1 **RESPONSE TO INTERROGATORY NO. 5.**

2 In addition to the General Objections set forth above, Rokoko objects to the  
3 extent that this Interrogatory is compound. Rokoko objects to the extent that this  
4 Interrogatory requests irrelevant information not proportional to the needs of the case  
5 Rokoko further objects to the extent that this Interrogatory is vague and ambiguous with  
6 respect to the terms “biometric information” and “any other uniquely identifiable  
7 information.” Rokoko further objects to the extent this Interrogatory seeks confidential  
8 or proprietary information involving third parties who are not a part of this litigation.

9 **INTERROGATORY NO. 6.**

10 Identify all instances in which Rokoko has used user animation data, with or  
11 without CMI, for artificial intelligence or machine learning purposes, including the date,  
12 the personnel involved, and the intended use.

13 **RESPONSE TO INTERROGATORY NO. 6.**

14 In addition to the General Objections set forth above, Rokoko objects to the  
15 extent that the Interrogatory is overbroad as to time and scope, including as to seeking  
16 “all instances” in which user animation data has been used. Rokoko further objections  
17 to the Interrogatory to the extent it seeks information that is disproportionate to the  
18 needs of this case and not reasonably calculated to lead to the discovery of admissible  
19 evidence. Rokoko further objects to the extent that this Interrogatory is vague and  
20 ambiguous as to the undefined terms “artificial intelligence” and “machine learning  
21 purposes.” Rokoko further objects to the extent this Interrogatory seeks confidential or  
22 proprietary information involving third parties who are not a part of this litigation.

23 **INTERROGATORY NO. 7.**

24 Identify all agreements, contracts, or written communications between Rokoko  
25 and Naver-Z (Zepeto) from January 1, 2020 to the present that concern user animation  
26 data, including the date, the individuals involved, and whether copyright management  
27 information (“CMI”) was discussed, included, altered, or removed.

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1 **RESPONSE TO INTERROGATORY NO. 7.**

2 In addition to the General Objections set forth above, Rokoko objects that this  
3 Interrogatory is overbroad insofar as it seeks “all agreements, contracts, or written  
4 communications”. Rokoko further objections to the Interrogatory to the extent it seeks  
5 information that is disproportionate to the needs of this case and not reasonably  
6 calculated to lead to the discovery of admissible evidence. Rokoko further objects that  
7 this Interrogatory is unduly burdensome and harassing insofar as it seeks private,  
8 confidential information involving Rokoko’s business dealings with a third-party who  
9 is not a party to this action.

10 **INTERROGATORY NO. 8.**

11 Identify all changes made to Rokoko’s Terms of Service from January 2020 to  
12 the present that referenced user content, user animation data, or anonymization, and  
13 state the reasons for those changes.

14 **RESPONSE TO INTERROGATORY NO. 8.**

15 In addition to the General Objections set forth above, Rokoko objects to the  
16 extent that this Interrogatory is vague and ambiguous with respect to the term  
17 “changes.” Rokoko further objects that this Interrogatory is unduly burdensome and  
18 harassing to the extent it requests information already provided or that will be provided  
19 to Plaintiff. Rokoko further objects to the extent this Interrogatory seeks information  
20 protected by the attorney-client privilege, work-product doctrine, and/or any other  
21 applicable privilege.

22 **INTERROGATORY NO. 9.**

23 Identify how and why Rokoko splits a user animation into about five segments  
24 after collection and what is the chain of custody / end-use for each of those segments  
25 after.

26 **RESPONSE TO INTERROGATORY NO. 9.**

27 In addition to the General Objections set forth above, Rokoko objects to the  
28 extent that this Interrogatory is vague and ambiguous as to the undefined terms “chain

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1 of custody” and “end-use.” Rokoko further objects that this Interrogatory is overbroad  
2 as to scope and time, not relevant to any claim or defense, and not reasonably tailored  
3 to lead to the discovery of admissible evidence.

4 **INTERROGATORY NO. 10.**

5 Identify all instances in which Rokoko communicated to users that their  
6 animation data, with or without CMI, could be resold, licensed, or used for AI/ML  
7 purposes and when.

8 **RESPONSE TO INTERROGATORY NO. 10.**

9 In addition to the General Objections set forth above, Rokoko objects to the  
10 extent that this Interrogatory is overbroad as to subject matter, time, and scope insofar  
11 as it seeks “all instances” of communication to “users”. Rokoko further objects to the  
12 extent that this Interrogatory is unduly burdensome and harassing insofar as formulating  
13 a response would impose an undue burden that is impractical and disproportionate to  
14 the needs of this case. Rokoko further objects to the extent that this Interrogatory seeks  
15 confidential, sensitive, or third-party privacy-protected information about non-parties  
16 that is not relevant to any claims or defenses of any party to this case. Rokoko further  
17 objects to the extent that this Interrogatory is vague and ambiguous with respect to the  
18 terms “resold,” “licensed,” and “used.”

19 **INTERROGATORY NO. 11.**

20 Identify all categories of technical logs, telemetry, animation data, project data,  
21 biometric data, or consent/opt-out records that Rokoko collected in connection with  
22 Plaintiff’s use of Rokoko’s products or services, including the dates and purpose of  
23 collection.

24 **RESPONSE TO INTERROGATORY NO. 11.**

25 In addition to the General Objections set forth above, Rokoko objects to the  
26 extent that this Interrogatory is compound. Rokoko objects to the extent that this  
27 Interrogatory is overbroad in that it seeks “all categories” of the requested information.  
28 Rokoko further objects to the extent that it seeks information that is irrelevant to any

1 claim and not proportional to the needs of the case. Rokoko further objects to the extent  
2 that the Interrogatory is vague and ambiguous, particularly as to the terms “technical  
3 logs, telemetry, animation data, project data, biometric data, or consent/opt-out  
4 records.”

5  
6 DATED: October 10, 2025

REED SMITH LLP

7  
8 By: /s/ Katherine J. Ellena  
Katherine J. Ellena  
9 Michael Galibois (*pro hac vice*)  
Emily Graue (*pro hac vice*)

10 *Attorneys for Defendant*  
11 *Rokoko Electronics*

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**VERIFICATION**

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I, Mikkel Overby, declare:

I am the CFO and COO for Rokoko Electronics, Inc. and hereby affirm that I am authorized to make this verification on behalf of Rokoko. The information contained within **DEFENDANT ROKOKO ELECTRONICS’ RESPONSES AND OBJECTIONS TO PLAINTIFF’S FIRST SET OF INTERROGATORIES** are true and correct to the best of my personal knowledge, information, and/or belief, based upon my own information and information given to me by others after reasonable investigation. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Rokoko reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

DATED: October 10, 2025



Mikkel Overby

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**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On October 10, 2025, I served the following document(s) by the method indicated below:

**DEFENDANT ROKOKO ELECTRONICS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh  
19197 Golden Valley Rd #333  
Santa Clarita, CA 91387  
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on October 10, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Heather Valencia

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