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Plaintiff In Pro Per,

**UNITED STATES DISTRICT COURT**  
**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: SUBPOENAS ISSUED**

**DECLARATION OF MATTHEW R. WALSH**  
**ISO MOTION TO COMPEL RE: SUBPOENAS ISSUED**

I, Matthew R. Walsh, declare as follows:

I am the Plaintiff in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. The following list are the subpoenas issued, their relevance, service status and issues.

1 1. Subpoena issued 9/15/2025 to Corridor Digital, LLC

2 **a. CAUSE FOR ISSUANCE:** Defendants accused Plaintiff of  
3 conducting a “harassment campaign” against them in this litigation.  
4 Plaintiff disputes those claims and issued a subpoena to Corridor  
5 Digital, LLC, which publicly discussed Plaintiff and this lawsuit on its  
6 podcast “Corridor Cast” (Episode #227). Counsel did not deny the  
7 accusation or their involvement.  
8

9 **b. INFORMATION SOUGHT:** *Produce: (i) all communications*  
10 *(emails, DMs, messages) from April 1, 2025 to present between*  
11 *Corridor Digital and Rokoko concerning this lawsuit, Plaintiff, or*  
12 *Corridor Cast EP #227; (ii) documents corroborating statements in*  
13 *EP #227; (iii) records of financial payments between Corridor and*  
14 *Rokoko from Jan. 1, 2020 to present; and (iv) an uncut, unedited mp3*  
15 *of EP #227, including any off-air commentary.*  
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17 **c. RELEVANCE:** Defendant made Corridor relevant by using them to  
18 run PR ops and their podcast to defame Plaintiff in front of industry  
19 colleagues, equals and the general population; while simultaneously  
20 attempting to convince the Court that Plaintiff is the harasser. The  
21 evidence sought undercuts Defendant’s core claims of harassment,  
22 and further provides evidence of Defendant’s ongoing unlawful  
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1 disruptions to prejudice this proceeding which is tantamount to  
2 Plaintiff's pending Motion for Sanctions. Defendant has since  
3 admitted Corridor is a "business partner" (Exhibit 1). As the damage  
4 is ongoing, Plaintiff wishes this information to be used to seek a  
5 protective order against Corridor Digital and Defendant and further to  
6 seek sanctions against Defendant for ongoing misconduct as well as  
7 possible damages for reputational harm among others.

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11 **d. STATUS:** Service was attempted on Corridor since 9/26/2025. The  
12 subpoena was signed and dated the same by the clerk. Multiple  
13 service processors abandoned attempts stating that Corridor is  
14 "hostile". A certificate of non-service was provided (Exhibit 10). As  
15 Corridor has dodged every attempt at service, Plaintiff sent the  
16 subpoena by Facebook, Instagram and e-mail with tracking links to  
17 Corridor. Tracking data shows the e-mail was opened by the  
18 recipients (Exhibit 11) pursuant to *[FTC v. PCCare247 Inc, Power*  
19 *Corp. of Canada v. Power Financial, MacLean-Fogg Co. v. Ningbo*  
20 *Fastlink Equip. Co., Seaboard Marine Ltd., Inc. v. Magnum Freight*  
21 *Corp., Popular Enters., LLC v. Webcom Media Group, Inc., Rio*  
22 *Props. v. Rio Int'l Interlink.]*

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4 2. Subpoena issued 9/13/2025 to Wikimedia Foundation

5 a. **CAUSE FOR ISSUANCE:** Defendants accused Plaintiff of  
6 conducting a “harassment campaign” against them in this litigation.  
7 Plaintiff disputes those claims and issued a subpoena to Wikimedia  
8 Foundation which shows Defendant definitively posting permanent,  
9 defamatory statements against Plaintiff and this proceeding. This  
10 subpoena aims to uncover the identity of a third anonymous poster  
11 under the name Sharleenbrando123 which Defendant believes may be  
12 either Defendant or even Counsel themselves as this user appeared  
13 only after litigation and only comments on Rokoko’s page and makes  
14 statements which draw legal conclusions. (Exhibit 2) . Counsel did not  
15 deny the accusation or their involvement.  
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21 b. **INFORMATION SOUGHT:** The subpoena seeks the location, IP  
22 address, name and e-mail address of the anonymous poster, which are  
23 relevant to whether Defendants, not Plaintiff, instigated public  
24 harassment and attempted to influence the narrative of this case.  
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26 c. **RELEVANCE:** Undercuts Defendant’s core claims of harassment  
27 and further evidences Defendant’s ongoing unlawful disruptions  
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1 intended to prejudice this proceeding. The conduct parallels the  
2 misconduct addressed in Plaintiff’s pending Motion for Sanctions and  
3 he intends to request a protective order pending the return of  
4 information. The legal phrasing, timing, and subject matter of the  
5 posts, appearing the same day Defendant retained Reed Smith LLP  
6 strongly suggest the involvement of Counsel or that they were made at  
7 Counsel’s direction.  
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11 **d. STATUS:** Successful service, no response from recipient  
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14 3. Subpoena issued 9/12/2025 to Trifork US, Inc.

15 **a. CAUSE FOR ISSUANCE:** Trifork is a 22.4% shareholder of  
16 Defendant’s “Parallel Company”, who is an intended DOE defendant  
17 and an alter-ego of Defendant’s Rokoko Electronics. Evidence and  
18 express admissions demonstrate that Trifork is a recipient of  
19 Plaintiff’s intellectual property and therefore, once all information is  
20 gathered, is to be added via a DOE amendment.  
21

22 **b. INFORMATION SOUGHT:** *“Produce in native format with  
23 metadata all agreements, payments, communications, or documents  
24 sufficient to show how Trifork US, Inc. (or it’s subsidiaries) and  
25 [Rokoko Electronics or Rokoko Care or CoCo Care] exchanged or  
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1           *used animation/mocap data, machine learning, or artificial*  
2           *intelligence from Jan. 1, 2020–present.”*

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4       **c. RELEVANCE:** Provides key evidence uncovering one of the parties  
5       involved in misappropriation and infringement of Plaintiff’s  
6       intellectual property. Further, secures Trifork as a judgment debtor in  
7       this case.  
8

9       **d. STATUS:** On or about September 23, 2025, Trifork emailed  
10       Plaintiff stating that “*the Company has determined that neither it **nor***  
11       *its subsidiaries have had any relevant communications or interactions*  
12       *with Rokoko Electronics or Rokoko Care or CoCo Care.”* Plaintiff  
13       immediately responded with documentary evidence directly  
14       contradicting those statements. Trifork did not reply. Plaintiff  
15       subsequently forwarded to Trifork a letter from Defendant’s counsel,  
16       Reed Smith LLP, in which Counsel expressly acknowledged that  
17       Trifork holds an equity stake in Defendant’s affiliated entity. Despite  
18       receiving this clarification, Trifork has refused to cooperate and  
19       indicated **they would not cooperate**, mirroring Defense Counsel’s  
20       narrative and obstructing discovery. (Exhibit 3)  
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28       4. Subpoena issued 9/12/2025 to Naver-Z USA, Inc.

1           **a. CAUSE FOR ISSUANCE:** Naver-Z is an equity shareholder of  
2 Defendant Rokoko Electronics having donated more than \$93M.  
3 Naver-Z is an intended DOE defendant. Evidence and express  
4 admissions demonstrate that Naver-Z is a recipient of Plaintiff’s  
5 intellectual property and a reseller of the same for their Metaverse and  
6 gaming avatars and therefore, once all information is gathered, is to be  
7 added via a DOE amendment.  
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9           **b. INFORMATION SOUGHT:** *“Produce in native format with  
10 metadata all agreements, payments, communications, or documents  
11 sufficient to show how Naver Z USA, Inc. (or it’s subsidiaries) and  
12 Rokoko Electronics exchanged or used animation/mocap data,  
13 machine learning, or artificial intelligence from Jan. 1, 2020–  
14 present.”*  
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16           **c. RELEVANCE:** Provides key evidence identifying one of the entities  
17 involved in the misappropriation and infringement of Plaintiff’s  
18 intellectual property. Defense Counsel has expressly acknowledged  
19 that Naver-Z holds an equity stake in Defendant. Evidence further  
20 demonstrates that Naver-Z received and exploited Plaintiff’s  
21 intellectual property for its own commercial purposes, including  
22 resale and distribution. Such evidence is essential to establish Naver-  
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1 Z's direct participation in the wrongful conduct and to secure its status  
2 as a judgment debtor in this action.

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4 **d. STATUS:** Naver-Z's law firm, who is the recipient of the Subpoena  
5 and SOS agent record has instructed security not allow subpoena  
6 service in this matter. After weeks of attempts and a direct phone call  
7 indicating I would move to compel, service was successful on  
8 September 26, 202 (Exhibit 4). They objected a week later.

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11 **e. OBJECTION:** Naver-Z claimed neither it, nor it's subsidiaries has  
12 any materials concerning Rokoko electronics (Exhibit 7); however  
13 CC'ed Defense Counsel prior to sending that e-mail showing  
14 coordination. Further, Plaintiff provided them with DocuSign  
15 evidence that Rokoko entered into an agreement with Naver-Z's CEO  
16 (Exhibit 8) and their own ESG report showing all subsidiaries have  
17 unified operational and financial reporting locus across all subsidiaries  
18 undercutting their claim. (Exhibit 9)  
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24 5. TWO (2) Subpoenas issued 9/12/2025 to DocuSign, Inc.

25 **a. CAUSE FOR ISSUANCE:** DocuSign provides only audit-trails of  
26 documents in which Defendant is a party to. To date, these documents  
27 have provided evidence to prove:  
28

- i. Alter-ego commingling of assets, ownership, shared board meetings for both the Parallel Company and Defendant at the same time, and more.
- ii. Additional DOE Defendants
- iii. Fraud upon the Court by Counsel (authoring Defendant's personal declarations and having them rubber stamped)
- iv. False statements under penalty of perjury (Defendant claiming they signed in Copenhagen but they actually signed in Tranbjerg contradicting the entire content of the declaration)
- v. False statements about nerve center arguments, CEO locations, day-to-day operations, etc.
- vi. False statements made to the Court by counsel re: extension for more time.
- vii. Contracts with multiple third parties who are or may be recipients of Plaintiff's intellectual property including but not limited to SnapChat.

**b. INFORMATION SOUGHT:**

- i. *“All docuSign envelope audit trails, including metadata, IP address, location information and the ‘subject’ of the envelope for the following e-mails: jesstropp@gmail.com,*

1 *projektmatias@gmail.com, mikkellucasoverby@gmail.com,*  
2 *Jakob.fisker@hotmail.com from January 1, 2022 to present.”*

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4 ii. *“All docusign envelope audit trails including metadata*  
5 *including but not limited to Envelope Subject, IP address and*  
6 *location data of signers for the domains @rokoko.com and*  
7 *@rokokocare.com and @cococare.io” – This request was*  
8  
9 **narrowed to a list of prefixed e-mail addresses.**

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11 **c. RELEVANCE:** Provides key evidence for multiple purposes in this  
12 case as listed in the CAUSE OF ISSUANCE.

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14 **d. STATUS:** Successful service, DocuSign agreed to produce  
15 document(s), however, Defendant notified DocuSign to cease  
16 production and falsely claims “meet and confer to quash has been  
17 initiated” after no such conference had been scheduled. (Exhibit 5)  
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23 6. Subpoena issued 9/12/2025 to Internet Archive

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25 **a. CAUSE FOR ISSUANCE:** The Internet Archive (archive.org) is a  
26 Court-accepted archive of historical website data. When a website is  
27 changed, the Internet Archive snapshots the page. Plaintiff requests  
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1 information to de facto prove that Defendant spoliated key evidence  
2 after litigation began.

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4 **b. INFORMATION SOUGHT:** *“Produce a complete audit trail of*  
5 *changes for the page <https://www.rokoko.com/studio-term-of-use> from*  
6 *Jan 1, 2020 to present. Produce any and all communications in which*  
7 *any party has contacted you involving any removal, masking or de-*  
8 *indexing of this website. Produce any logs or information indicating*  
9 *the use of robots.txt, user-agent disallow, javascript content masking,*  
10 *custom HTTP header’s including but not limited to x-archive-ignore-*  
11 *errors, HTTP response codes including but not limited to 404 or 410.*  
12 *The spirit of this subpoena is to detect and explain the sudden*  
13 *disappearance of this evidence mid-litigation (~May 2025). Include*  
14 *any such logs sufficient to show this.”*

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19 **c. RELEVANCE:** Provides bona fide third-party confirmation that  
20 Defendant spoliated key evidence intentionally pursuant to the  
21 requirements of Rule 37(e): proof from an independent source  
22 showing intentional deletion after notice.  
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25 **d. STATUS:** The Internet Archive has refused service on this matter  
26 entirely.  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September, 27 2025, in Santa Clarita, California.



Matthew R. Walsh  
Plaintiff in pro per