

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**
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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:
FABRICATED CASELAW**

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10 **DECLARATION OF MATTHEW R. WALSH**

11 **ISO MOTION TO COMPEL RE: FABRICATED CASELAW**

12
13 I, Matthew R. Walsh, declare as follows:

14 I am the Plaintiff in this action. I have personal knowledge of the facts set forth
15 herein and, if called as a witness, could and would testify competently thereto.
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17 On or about September 30, 2025; Defendant sent Plaintiff a Rule 11 safe
18 harbor demand letter to withdraw the Request for Judicial notice. Within the e-mail
19 was a zip file containing LexisNexis PDF exports of each case that Defendant
20 relied on -- which they believed would prove their position to be true. It did not.

21 The output below demonstrates that **(a)** none of the cited phrases exist
22 within the provided case files and/or **(b)** even if the text exists, it was the wrong
23 cited authority and **(c)** every case provided was dismissed, vacated or
24 administratively closed and cannot be cited as an authority pursuant to The Stare
25 Decisis Doctrine, FRCP 41, United States of America v Sigma International, Inc.

26 Under FRCP 11(b)(2) and Model Rule 3.3(a)(1), the continued presentation
27 of demonstrably false or vacated authorities constitutes sanctionable conduct.
28 Plaintiff should not be forced to continually disprove fictional authorities; this
29 impairs judicial economy and burdens the Court's resources.

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31 1. **CITATION:** *Villanueva v. County of Los Angeles*, 2025 U.S. Dist. LEXIS
32 116120, at *4 (C.D. Cal. Apr. 14, 2025), for the proposition that "*Federal*
33 *courts ordinarily recognize a constitutionally based right of privacy that can*
34 *be raised in response to discovery requests.*"

35 **CASE STATUS:** Dismissed twice.

36 **ISSUE:** The case was dismissed and cannot be an authority. The quote

37 appears in their provided PDF file, however, Villaneuva is not the authority
38 for that quote. The authority is actually [A. Farber & Partners, Inc. v.
39 Garber, 234 F.R.D. 186, 191 (C.D. Cal. 2006)]

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41 2. **CITATION:** *SPS Techs., LLC v. Briles Aero., Inc.*, 2019 U.S. Dist. LEXIS
42 241074 (C.D. Cal. June 24, 2019), asserting that “*Courts have routinely*
43 *quashed subpoenas seeking confidential commercial information such as*
44 *this.*”

45 **CASE STATUS:** VACATED.

46 **ISSUE:** That case was vacated and cannot be an authority. Defendant’s
47 quote does not appear even in Defendant’s provided counter-evidence PDF
48 as shown below:

49 a. PDFind v3.240.820
50 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
51 Cases\Subpoena Cases\SPS Techs._ LLC v. Briles Aero._ Inc._ 2019
52 U.S. Dist. LEXIS 241074.pdf"
53 Enter search string: *Courts have routinely quashed*
54 === Matches Found ===
55 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
56 PLAIN]
57 **NO MATCHES FOUND in 6 pages, 236 lines**
58 Press any key to exit...

61 3. **CITATION:** “[t]he clerk must issue a subpoena, signed but otherwise in
62 blank, to a party who requests it. That party must complete it before service.
63 An attorney also may issue and sign a subpoena if the attorney is authorized
64 to practice in the issuing court.” See also Ekene v. Office L. Fowler, 2023
65 U.S. Dist. LEXIS 187409, at *3 (C.D. Cal. April 13, 2023)

66 **CASE STATUS:** Dismissed

67 **ISSUE:** That case was vacated and Defendant’s quote does not appear even
68 in Defendant’s provided counter-evidence PDF as shown below:

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70 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
71 Cases\Subpoena Cases\Ekene v. Office L. Fowler_2023 U.S. Dist.
72 LEXIS 187409.pdf"
73 Enter search string: *That party must complete*
74 === Matches Found ===
75 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
76 PLAIN]
77 **NO MATCHES FOUND in 4 pages, 135 lines**
78 Press any key to exit...

80 4. **CITATION:** Defendant relies on the caselaw: (“*Plaintiff, proceeding pro*
81 *se, may only serve a subpoena issued by the Clerk of this Court.*”); McGee
82 v. Cnty. of Riverside, 2022 U.S. Dist. LEXIS 193707, at *2 (C.D. Cal. Oct.
83 21, 2022)

84 **CASE STATUS:** Voluntarily Dismissed

85 **ISSUE:** That case was vacated and cannot be an authority. Defendant’s

86 quote does not appear even in Defendant’s provided counter-evidence PDF
87 as shown below:

88 a. PDFind v3.240.820
89 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
90 Cases\Subpoena Cases\McGee v. Cnty. of Riverside_2022 U.S. Dist.
91 LEXIS 193707.pdf"
92 Enter search string: *proceeding pro se*
93 === Matches Found ===
94 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
95 PLAIN]
96 **NO MATCHES FOUND in 2 pages, 63 lines**
97 Press any key to exit...

100 5. **CITATION:** When a subpoena is directed to a non-party, the standards for
101 discovery “*require a stronger showing of relevance than for simple party*
102 *discovery.*” *Monster Energy Co. v. Vital Pharm., Inc.*, 2020 U.S. Dist.
103 LEXIS 87320, at *16 (C.D. Cal. March 10, 2020).

104 **CASE STATUS:** Voluntarily Dismissed.

105 **ISSUE:** While the quote appears *only* in Defendant’s PDF file, that case was
106 voluntarily dismissed and cannot be an authority. Further *Monster Energy* is
107 not the authority, it is actually [*Laxalt v. McClatchy*, 116 F.R.D. 455, 458
108 (D. Nev. 1986)]

109 a. PDFind v3.240.820
110 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
111 Cases\Subpoena Cases\Monster Energy Co. v. Vital Pharm._
112 Inc._2020 U.S. Dist. LEXIS 87320.pdf"

Enter search string: *require a stronger showing*

==== Matches Found ====

[DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE: PLAIN]

Page 7 (lines: 37, 38, 39, 40, 41, 42, 43, 44, 45)

[7:37] **A non-party has the right to object on relevance grounds to avoid production and courts have routinely held that "it**

[7:38] **is a generally accepted rule that standards for non[-]party discovery . . . require a stronger showing of relevance <-- 1 matches found**

[7:39] **than for simple party discovery." See, e.g., Laxalt v. McClatchy, 116 F.R.D. 455, 458 (D. Nev. 1986). Finally,**

[7:40] counsel for a party is considered a non-party for purposes of discovery. See Hickman, 329 U.S. at 504-05, (1947).

[7:41] C. Compelling Discovery Involving Trial Counsel

[7:42] Counsel are not automatically exempt from being subjected to a subpoena to produce documents or to testify.

[7:43] United Phosphorus, Ltd. v. Midland Fumigant, Inc., 164 F.R.D. 245, 247-48 (D. Kan. 1995); see also Littlefield v.

[7:44] Nutribullet, LLC, No. CV 16-6894 MWF (SSx), 2017 U.S. Dist. LEXIS 229420, 2017 WL 10438897, at *4 (C.D. Cal.

[7:45] Page 7 of 15

Results saved to: C:\Users\Matt\Documents\Subpoena Cases\Subpoena Cases\matches_output.txt

Press any key to exit...

- 6. **CITATION:** (finding “[documents] which regard or reference” facially overbroad); Stewart v. Mitchell Transport, U.S. Dist. LEXIS 12958 (D. Kan. July 11, 2002) (finding “[documents] regarding” facially overbroad);

CASE STATUS: Voluntarily Dismissed

146 **ISSUE:** That case was vacated and Defendant’s quote does not appear even
147 in Defendant’s provided counter-evidence PDF as shown below:

148 a. PDFind v3.240.820
149 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
150 Cases\Subpoena Cases\Stewart v. Mitchell Transp._2002 U.S. Dist.
151 LEXIS 12958.pdf"
152 Enter search string: *regard or reference*
153 ==== Matches Found ====
154 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
155 PLAIN]
156 **NO MATCHES FOUND in 12 pages, 508 lines**
157 Press any key to exit...

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161 7. **CITATION:** Bradley v. Val-Mejias, 2001 U.S. Dist. LEXIS 25278, at *18
162 (D. Kan. Oct. 9, 2001) (“*use of the term `pertaining to,’ often makes a*
163 *discovery request overly broad and unduly burdensome on its face*”).

164 **CASE STATUS:** Dismissed.

165 **ISSUE:** The case was dismissed, further Bradley is not the authority. The
166 authority is actually [Mackey v. IBP, Inc., 167 F.R.D. 186, 197 (D. Kan.
167 1996)]

168 a. PDFind v3.240.820
169 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
170 Cases\Subpoena Cases\Bradley v. Val-Mejias_2001 U.S. Dist. LEXIS
171 25278.pdf"
172 Enter search string: *use of the term*
173 ==== Matches Found ====
174 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
175 PLAIN]

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Page 7 (lines: 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48)
[7:10] **The Court agrees with Plaintiff that this request is unduly burdensome. The use of the term "pertaining to," often <-- 1 matches found**
[7:11] **makes a discovery request overly broad and unduly burdensome on its face. See Mackey v. IBP, Inc., 167**
[7:12] **4**
[7:13] **F.R.D. 186, 197 (D. Kan. 1996). Such a phrase often requires the answering party "to engage in mental**

8. **CITATION:** Williams v. City of Dallas, 178 F.R.D. 103, 110 (N.D. Tex. 1998) (finding “any and all documents related to” *facially overbroad because “(it is limited neither by reasonable restrictions on time nor by particular documentary descriptions”)*)

CASE STATUS: Administratively closed.

ISSUE: The citation features several issues:

- a. The case was administratively closed.
- b. The quote is inapplicable and has nothing to do with how Defendant used it as post-citation goes on to explain: “(holding that document request that was **unlimited as to time frame**, as well as to the types of writings sought, fell far short of fulfilling requirement of Rule 34(b)...”

202 c. Williams is not the authority. The authority is actually [Amcast Indus.
203 Corp. v. Detrex Corp., 138 F.R.D. 115, 121 (N.D. Ind. 1991)]

204 d. Defendant's quote does not exist as written, the judge never said it.

205 i. Capitalization on the letters is different

206 ii. There are no parenthesis in the actual text, but are here.

207 iii. The 'Frankenquote' Defendant provided is manufactured from
208 three nonconsecutive separate snippets fabricated into a
209 different order which does not exist in the text.

210 e. PDFind v3.240.820

211 Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena
212 Cases\Subpoena Cases\Williams v. City of Dallas_178 F.R.D.
213 103.pdf"

214 Enter search string: *reasonable restrictions*

215 === Matches Found ===

216 [DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE:
217 PLAIN]

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219 Page 6 (lines: 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30,
220 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49,
221 50, 51, 52, 53)

222 [6:16] **Category 1 of the instant subpoenas is overbroad on its**
223 **face. It requires production of "any and all documents**

224 [6:17] **relating to Erik Williams, Michael Irvin and Nina**
225 **Shahravan." It is limited neither by reasonable restrictions on**

226 <-- 1 matches found

227 [6:18] **time nor by particular documentary descriptions. See**
228 **Amcast Indus. Corp. v. Detrex Corp., 138 F.R.D. 115, 121**

229 [6:19] **(N.D. Ind. 1991)** (holding that document request that was
230 unlimited as to time frame, as well as to the types of

231 [6:20] writings sought, fell far short of fulfilling requirement of
232 Rule 34(b) that each item or category of documents be

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9. **CITATION:** *“the relevance of the requested materials, breadth of the requests, potential harm of disclosure to the movant, and the movant's reasonable privacy interests in the materials.”* Pate v. Pac. Harbor Line, Inc., 2023 U.S. Dist. LEXIS 52632, at *28-29 (C.D. Cal. Feb. 6, 2023).

CASE STATUS: Dismissed

ISSUE: That case was dismissed and Defendant’s quote does not appear:

a. PDFind v3.240.820
Enter full path to PDF file: "C:\Users\Matt\Documents\Subpoena Cases\Subpoena Cases\Pate v. Pac. Harbor Line_ Inc._ 2023 U.S. Dist. LEXIS 52632.pdf"
Enter search string: *the relevance of the requested materials, breadth of the requests, potential harm of disclosure to the movant*
==== Matches Found ====
[DATA MODE: AS-IS] [FILTERS: NONE] [SEARCH MODE: PLAIN]
NO MATCHES FOUND in 15 pages, 632 lines
Press any key to exit...

PLAINTIFF’S EXPLANATION OF WHY THIS HAS OCCURED:

An LLM (aka Large Language Model) like ChatGPT (or any brief-generator built on one) doesn’t verify provenance, it just retrieves surface matches. When it sees a clause like *“require a stronger showing of relevance than for simple party*

260 *discovery*”, it scans its embeddings, spots that sequence of tokens co-occurs near
261 “*Monster Energy v Vital Pharm.*” somewhere, and binds them together as if
262 they’re causally linked because *they are* closest tokenized relatives or even
263 descendants. It’s basically thinking: “If the text is within or very near to Monster,
264 then Monster is the case it’s from”. **Without instruction**, it will not recurse deeper
265 into the case’s text, citations, links and continue to follow the trail until it exhausts
266 all possibilities, locating the proper case. It will also self-correct grammar and
267 structure, leading to “close but not exact” fabricated language. Diligence is up to
268 the human, or in this case, Counsel. It appears as AI was used and diligence was
269 not followed and instead Counsel left it for Plaintiff to resolve on his dime.

270
271 **CONCLUSION:**

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273 Defendant’s continued reliance on vacated or fabricated authorities cannot be
274 excused as inadvertence or mistake and Plaintiff should not have to continually
275 disprove their citations. They didn’t want to do the work and instead took
276 shortcuts. This declaration demonstrates that each citation which is still being
277 relied upon by Defendant collapses under basic verification which Defendant
278 refuses to do.

279 I declare under penalty of perjury under the laws of the United States of America
280 that the foregoing is true and correct.

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282 Executed this October 10, 2025, in Santa Clarita, California.

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285

Matthew R. Walsh

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Plaintiff in pro per