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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
DOES 1 through 50, inclusive,

18 Defendant.
19
20

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

[Assigned to Hon. Otis D. Wright, II,
Courtroom 5D; Hon. Rozella A. Oliver,
Courtroom 590]

**DECLARATION OF KATHERINE
ELLENA IN SUPPORT OF
DEFENDANT ROKOKO
ELECTRONICS' OMNIBUS
MOTION TO QUASH SUBPOENAS
AND TO ISSUE A PROTECTIVE
ORDER**

Date: November 19, 2025
Time: 10:00 a.m.
Place: Dept. 590

[Concurrently filed with Omnibus Motion
to Quash Subpoenas and To Issue a
Protective Order; and [Proposed]
Order]

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

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DECLARATION OF KATHERINE ELLENA

I, Katherine Ellena, declare:

1. I am an attorney with Reed Smith LLP and counsel for Defendant Rokoko Electronics (“Rokoko”). I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration in support of Rokoko’s Motion to Quash Subpoenas and To Issue a Protective Order (the “Motion”).

3. Between September 12-15, 2025, Plaintiff Matthew R. Walsh (“Plaintiff”) provided my office with notice of subpoenas to DocuSign, Inc.; c/o United Agent Group, Inc. (two), Trifork US Inc. (“Trifork”), Naver Z USA, Inc. (“Naver Z”), Internet Archive, Wikimedia Foundation, and Corridor Digital, LLC (the “First Attempt Subpoenas”) seeking documents to be produced between September 27-30, 2025. True and correct copies of the First Attempt Subpoenas as received by my office are attached hereto as **Exhibits A-G**.

4. Previously, on August 6, 2025, Plaintiff issued two additional subpoenas to DocuSign. True and correct copies of the August 6, 2025 subpoenas are attached hereto as **Exhibits H & I**. On August 7, 2025 I emailed Plaintiff stating that these subpoenas were premature and asking him to withdraw them. Plaintiff responded “I will not withdraw the subpoenas. In fact, I’m drafting even more.” A true and correct copy of Plaintiff’s August 7, 2025 email is attached hereto as **Exhibit J**.

5. On September 13, 2025, Plaintiff sent me an email with a subpoena directed to Wikimedia Foundation attached stating that its purpose was to “uncover the identify of one of the anonymous usernames outright accusing me of defaming your client.” A true and correct copy of Plaintiff’s September 13, 2025 email is attached hereto as **Exhibit K**.

6. Between August 4, 2025 and September 29, 2025, I engaged in email correspondence with Plaintiff regarding various discovery issues, including the

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1 impropriety of the Subpoenas. These communications also included a September 18,
2 2025 email stating Rokoko’s intention file a Motion to Quash the Subpoenas and
3 requesting a meet and confer. A true and correct copy of the email chain between
4 Plaintiff and myself from August 4, 2025 to September 29, 2025 is attached hereto as
5 **Exhibit L.**

6 7. The parties have not yet met and conferred pursuant to Rule 26. Nor has
7 either party made its initial disclosures or produced documents.

8 8. Between September 10 and September 12, 2025, Plaintiff propounded a
9 total of 29 Requests for Production, 90 Requests for Admission, and 11 Interrogatories
10 on Rokoko. Rokoko served its responses and objections to Plaintiff’s discovery
11 requests on October 10, 2025.

12 9. On September 25, 2025, I served Plaintiff with a LR 37-1 Meet and Confer
13 Letter regarding the facial and procedural defects in the Subpoenas. A true and correct
14 copy Rokoko’s September 25, 2025 LR 37-1 Meet and Confer Letter is attached hereto
15 as **Exhibit M.**

16 10. On September 26, 2025, Plaintiff emailed me a photograph of what
17 purports to be himself holding a stack of papers, the first of which appeared to be a
18 subpoena to non-party Corridor, which was never actually served on me but appears to
19 be stamped by the Clerk of Court. A true and correct copy of Plaintiff’s September 26,
20 2025 email, including the photograph sent to me, are attached hereto as **Exhibit N.**

21 11. Notice of the Second Attempt Subpoenas was never served on Rokoko or
22 my office, nor were copies served on or delivered to me. The only versions in Rokoko’s
23 possession were obtained on October 10, 2025, as photographs attached to a declaration
24 in support of yet another discovery motion by Plaintiff. *See* ECF No. 81-1, Ex. 15.

25 12. Counsel for Naver Z served its objections to Plaintiff’s September 26, 2025
26 subpoenas (i.e. those served with the Second Set Subpoenas), on October 3, 2025

1 (“Naver Objections”). A true and correct copy of Naver Objections is attached hereto
2 as **Exhibit O**.

3 13. A true and correct copy of Plaintiff’s email to Naver Z, sent at 11:02 a.m.
4 on October 3, 2025 is attached hereto as **Exhibit P**.

5 14. A true and correct copy of Plaintiff’s email to Naver Z, sent at 11:28 a.m.
6 on October 3, 2025 is attached hereto as **Exhibit Q**.

7 15. A true and correct copy of the September 23, 2025 email correspondence
8 between Plaintiff and counsel for Trifork, is attached hereto as **Exhibit R**.

9
10 I declare under penalty of perjury under the laws of the State of California and
11 the United States that the foregoing is true and correct and that this declaration was
12 executed on October 15, 2025, in Los Angeles, California.

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14 /s/ Katherine J. Ellena

15 Katherine J. Ellena
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EXHIBIT A

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

To: DocuSign, Inc.; c/o United Agent Group, Inc. 707 W. Main Avenue, #B1, Spokane, WA 99201

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All docuSign envelope audit trails, including metadata, IP address, location information and the 'subject' of the envelope for the following e-mails: jesstropp@gmail.com, projektmatias@gmail.com, mikkellucasoverby@gmail.com, Jakob.fisker@hotmail.com from January 1, 2022 to present.

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/27/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

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

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT B

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

To: DocuSign, Inc.; c/o United Agent Group, Inc. 707 W. Main Avenue, #B1, Spokane, WA 99201

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All docuSign envelope audit trails including metadata including but not limited to Envelope Subject, IP address and location data of signers for the domains @rokoko.com and @rokocare.com and @cococare.io

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/27/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

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

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i)** is a party or a party's officer; or
- (ii)** is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i)** fails to allow a reasonable time to comply;
- (ii)** requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv)** subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii)** ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i)** expressly make the claim; and
- (ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT C

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

Trifork US Inc.;

To: c/o CANOPY Pacific Heights, 2193 Fillmore Street, San Francisco, CA 94115

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce in native format with metadata all agreements, payments, communications, or documents sufficient to show how Trifork US, Inc. (or its subsidiaries) and [Rokoko Electronics or Rokoko Care or CoCo Care] exchanged or used animation/mocap data, machine learning, or artificial intelligence from Jan. 1, 2020-present.

Place: Remit to: matthew@winteryear.com Date and Time: 09/27/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

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

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's

study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT D

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

NAVER Z USA, INC. c/o PAUL KIM, 707 WILSHIRE BLVD., SUITE 4600, LOS ANGELES, CA 90017

To: (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce in native format with metadata all agreements, payments, communications, or documents sufficient to show how Naver Z USA, Inc. (or it's subsidiaries) and Rokoko Electronics exchanged or used animation/mocap data, machine learning, or artificial intelligence from Jan. 1, 2020-present.

Place: Remit to: matthew@winteryear.com Date and Time: 09/27/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT E

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

Internet Archive, 300 Funston Avenue San Francisco, CA 94118

To:

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce a complete audit trail of changes for the page https://www.rokoko.com/studio-term-of-use from Jan 1, 2020 to present. Produce any and all communications in which any party has contacted you involving any removal, masking or de-indexing of this website. Produce any logs or information indicating the use of robots.txt, user-agent disallow, javascript content masking, custom HTTP header's including but not limited to x-archive-ignore-errors, HTTP response codes including but not limited to 404 or 410. The spirit of this subpoena is to detect and explain the sudden disappearance of this evidence mid-litigation (~May 2025). Include any such logs sufficient to show this.

Place: Remit to: matthew@winteryear.com Date and Time: 09/28/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Matthew R. Walsh Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT F

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

Wikimedia Foundation

To: 1 Montgomery St., Suite 1600, San Francisco, CA 94104

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce all user account information (except the password) of Sharleenbrando123 including but not limited to e-mail address, phone number and IP address. If possible entire HTTP request headers during each post/edit/undo/removal or any other usage including but not limited to: HTTP_REFERER, User-Agent, Location information, Platform or other HTTP request header information. If the IP address matches any other Wikipedia users, please provide any such similar information as above if possible.

Table with 2 columns: Place (Remit to: matthew@winteryear.com) and Date and Time (09/28/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/13/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Matthew R. Walsh

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT G

UNITED STATES DISTRICT COURT

for the
Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics and DOES 1 - 50 Inclusive

Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

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

To: (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce all communications (Including but not limited to: e-mails, DM's, instant messages) from April 1, 2025 to present involving Corridor Digital (or any member, agent or affiliated persons) and/or Rokoko Electronics (or any member, agent or affiliated persons) regarding the active lawsuit, the Plaintiff Matthew R. Walsh or any communications regarding Corridor Cast EP #227. Further, produce all documents sufficient to corroborate the truthfulness of your each of your counterclaims and statements in EP #227 regarding the lawsuit and the Plaintiff. Additionally, produce documents sufficient to identify any and all financial payments to or from Rokoko from Jan 1, 2020 to present. Lastly, produce an uncut, unedited copy of EP #227 in mp3 format including any off-air commentary that may have been recorded.

Place: Remit to: matthew@winteryear.com Date and Time: 09/30/2025 12:00 am

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/15/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh Matthew R. Walsh plaintiff in pro per, who issues or requests this subpoena, are: 19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

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

Civil Action No. 2:25-cv-05340-ODW-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

' I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

' I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT H

UNITED STATES DISTRICT COURT

for the

Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics

Defendant

Civil Action No.

2:25-cv-05340-ODW-RAO

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

To: Docusign

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: The full audit trail for Envelope ID 731C2183-C8A8-4B97-91B2-5D2D3EA4325E, including all metadata, IP addresses of sender and signer, timestamps, access logs, authentication records, and any associated records retained by DocuSign.

Table with 2 columns: Place (matthew@winteryear.com) and Date and Time (06/13/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/06/2025

CLERK OF COURT

OR

Handwritten signature of Matthew R. Walsh

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh, who issues or requests this subpoena, are: Matthew R. Walsh, in pro per, matthew@winteryear.com, 19197 Golden Valley Rd. #333, Santa Clarita, CA 91350

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT I

UNITED STATES DISTRICT COURT

for the

Central District of California

Matthew R. Walsh

Plaintiff

v.

Rokoko Electronics

Defendant

Civil Action No.

2:25-cv-05340-ODW-RAO

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

To: Docusign

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: "All metadata including IP addresses, geolocation data (if available), device/browser fingerprints, and timestamps for any and all signatures executed by e-mail addresses jakob@docusign.com matias@docusign.com and mikkel@docusign.com — across all DocuSign envelopes from January 1, 2024 to present.

Table with 2 columns: Place (matthew@winteryear.com) and Date and Time (06/13/2025 12:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/06/2025

CLERK OF COURT

OR

Handwritten signature of Matthew R. Walsh

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh, who issues or requests this subpoena, are: Matthew R. Walsh, in pro per, matthew@winteryear.com, 19197 Golden Valley Rd. #333, Santa Clarita, CA 91350

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT J

Valencia, Heather R.

From: matthew@winteryear.com
Sent: Thursday, August 7, 2025 1:22 PM
To: Ellena, Katherine J.; Graue, Emily H.; Valencia, Heather R.; Galibois, Michael B.
Subject: RE: RE:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Ms. Ellena,

I can explain relevance and privacy quite simply:

1. Relevance: You say your clients conduct all business every day from Copenhagen. I already have forensics and a vast amount of new evidence that proves otherwise. This will as well.
2. Privacy: I am a party to the lawsuit and have a rightful interest in the information filed within the Court case I am a party to, and initiated. Especially if I believe a law is being broken. DocuSigns literal legal terms state the following:
 - a. DocuSign may disclose responsive records in accordance with local legal process requirements
 - b. As described in our [Terms of Use](#), DocuSign may also share user information: (i) when we have a good faith belief that an emergency involving danger of death or serious physical injury requires disclosure without delay; or (ii) in connection with the investigation of violations of the DocuSign [Privacy Policy](#) or other agreements with DocuSign; or (iii) to protect the legal rights of third parties, including our employees, users, or the public; or (iv) to report suspected illegal activity; or as otherwise required by local law.

Your assertion that the DocuSign subpoenas are “premature” under Rule 26(d) is factually and procedurally incorrect.

Per our Rule 7-3 meet-and-confer on June 26, 2025, which lasted over 1 hour and 11 minutes, and in *many* e-mails I made abundantly clear that:

- I intended to leave no stone unturned to verify the authenticity of declarations and filings submitted under penalty of perjury.
- I expressed serious concerns about unauthorized practice of law, falsified declarations, and ghostwritten filings submitted before your counsel’s pro hac vice admission.
- I even went so far to explain to you that I would seek to crack attorney client communications under the crime-fraud exception.
- If I was willing to go as far as I have and state I’d go much farther, it’s unreasonable to think I would not use standard, everyday legal mechanisms.

- This is not your first case. You were fully aware that such subpoenas would follow — not for routine discovery, but as part of a challenge to jurisdiction, removal, and abuse of process which is outlined in the Motion that has been on the docket for over a month and had a prior filing of.

Accordingly, the subpoenas are not premature, as they stem directly from issues raised prior to the 26(f) conference, and fall within the Court's inherent power to supervise the integrity of its docket.

I will not withdraw the subpoenas. In fact, I'm drafting even more.

If you wish to challenge them, I invite you to file a motion to quash but then you finally have to address the forensic metadata already on the docket that you have avoided and further why you failed to disclose authorship or compliance with Rule 11 before those documents were filed.

I will be completely honest with you, since then I have uncovered *far more* express and forensic data to support my case:

- I have witness statements from some prominent associated individuals.
- I have plenty of forensic and location data which points your clients in places they said they weren't when they said they weren't.
- I have Rokoko's entire source code for their software. Every version since 2019 – which, highly strengthens my case to absolute precision – and very likely opens up a whole different can of worms entirely for your clients. I won't indulge too much, I'm sure they will fill you in.

Should you move to quash, I will oppose and submit all this evidence quickly onto the Court docket and the judge can infer the real reason you are opposing.

Until then, the subpoenas stand.

Very much looking forward to the August 18th hearing!

Have a great day.
Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>

Sent: Thursday, August 7, 2025 8:36 AM

To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>

Subject: RE: RE:

Mr. Walsh:

Presently, both of your subpoenas directed to DocuSign are premature. Per Federal Rule of Civil Procedure 26(d), "[e]xcept in categories of proceedings exempted from initial disclosure under Rule 26(a)(1)(E), or when authorized under these rules or by order or agreement of the parties, a party may not seek discovery from any source before the parties have conferred as required by Rule 26(f)." None of the exceptions are met here, and a Rule 26(f) conference has not taken place. Accordingly, the subpoenas are defective on their face.

Please immediately confirm that you will withdraw both subpoenas. Rokoko reserves all rights to object to the propriety of the subpoenas on other grounds, including without limitation as to relevance and privacy.

Best,

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception:
213.457.8000 | Fax: 213.457.8080

Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century City | Chicago | Dallas | Denver | Dubai | Frankfurt
| Greece | Hong Kong | Houston | Kazakhstan | London | **Los Angeles** | Miami | Munich | New York | Paris |
Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
Washington DC | Wilmington

From: matthew@winteryear.com <matthew@winteryear.com>

Sent: Wednesday, August 6, 2025 5:34 PM

To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>

Subject: RE:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

See attached

From: Matthew R. Walsh <matthew@winteryear.com>

Sent: Monday, August 4, 2025 4:18 PM

To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>

Subject:

For the upcoming hearing do you intend to appear remotely or in person?

Thank you
Matthew R. Walsh

Sent via [BlackBerry Hub+ Inbox for Android](#)

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021

EXHIBIT K

Valencia, Heather R.

From: matthew@winteryear.com
Sent: Saturday, September 13, 2025 1:42 PM
To: Ellena, Katherine J.; Graue, Emily H.; Valencia, Heather R.; Galibois, Michael B.
Subject: RE: RE:
Attachments: Wikipedia 1.docx

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Another to uncover the identify of one of the anonymous usernames outright accusing me of defaming your client. This is the one I couldn't get the IP address for. More subpoenas coming

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Saturday, September 13, 2025 1:32 PM
To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>
Subject: RE: RE:

Another subpoena issued. I have a few more going out.

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, September 12, 2025 10:08 PM
To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>
Subject: RE: RE:

The Court's order (Dkt. 71, n.1) expressly authorizes discovery **now**. I remain available to confer under Rule 26(f) at your earliest convenience. As the Court has ordered, discovery has begun.

Regarding the Reply/Reply All issue, that was my error — I simply clicked Reply instead of Reply All. thank you for confirming receipt.

Finally, I must note for the record that I have preserved evidence of anonymous online postings and edits concerning me specifically and this litigation, including records identifying the originating IP address in Denmark and correlating details sufficient to identify the source.

These materials accuse me of defamation against your clients and making false statements and accusations, which is improper and prejudicial. I will be maintaining this evidence and will present it to the Court at the appropriate time. I implore you to discuss with your clients the issues surrounding such activities or making such statements.

Thank you,
Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Friday, September 12, 2025 8:49 PM
To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: RE:

Mr. Walsh,

As we mentioned before, any form of discovery is premature prior to the occurrence of a Rule 26(f) conference, which the parties have not conducted. See Fed. R. Civ. Pro. 26(d) (stating “[a] party may not seek discovery from any source before the parties have conferred as required by Rule 26(f).”); see also *Lombana v. Green Tree Servicing, LLC*, 2016 U.S. Dist. LEXIS 187611, at *2-3 (C.D. Cal. 2016) (holding that when the parties have not met and conferred concerning a discovery plan, discovery requests are premature); *Babakhanlou v. Los Angeles Cnty.*, 2024 U.S. Dist. LEXIS 219792, at *3 (C.D. Cal. 2024) (same); *LeSzczyński v. Kitchen Cube LLC*, 2024 U.S. Dist. LEXIS 75252, at *5-7 (C.D. Cal. 2024) (same).

At no time have the parties held a Rule 26(f) conference, as a Rule 26(f) conference specifically addresses the creation of a discovery plan. On September 9, 2025, Judge Wright issued a Notice of Intent to Issue a Scheduling Order on November 17, 2025, with the instruction that the parties meet and confer pursuant to Rule 26(f) 21 days prior to that date. (Dkt. 71). Since then, you have served RFAs, Interrogatories, and RFPs on my client, in addition to multiple additional subpoenas on DocuSign. Until that Rule 26(f) conference has been held, your discovery requests, including the subpoenas, are premature. While I am traveling this week for an unrelated matter, I will respond to you with my availability to conduct a Rule 26(f) conference as soon as I am able. In the interim, Rokoko reserves all rights to move to quash and/or seek a protective order over the improper discovery requests that you continue to serve.

As a logistical matter, please refrain from sending emails to my executive assistant, Heather Valencia, only. As an attorney of record for this matter, I ask that I be copied on any email that you send regarding this matter.

Thanks,
Kat

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080

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From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Tuesday, September 9, 2025 2:42 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: RE:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Hello everyone,

As you have seen, I have withdrawn my requests for remand/vacatur. This case will proceed in federal court, which I now believe is the proper and most efficient forum.

Judge Wright has set November 17, 2025 as the date by which a Scheduling Order will issue. Under Rule 26(f), we will need to meet and confer no later than 21 days prior to that date. Please let me know your availability so we can coordinate.

Plaintiff's claims under the DMCA and Copyright Act expose your clients to substantial damages, potentially in the hundreds of millions of dollars, in addition to supplemental state-law claims. That exposure will only increase as discovery proceeds and as the record is clarified.

I intend to move for summary judgment at the first appropriate opportunity and I am confident that my currently held evidence, admissions and the record already supports my claims to a degree of inevitability. With that in mind, I remain open to discussing early resolution to avoid unnecessary litigation expenses.

Thank you
Matthew R. Walsh

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Thursday, August 7, 2025 8:36 AM
To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: RE:

Mr. Walsh:

Presently, both of your subpoenas directed to Docusign are premature. Per Federal Rule of Civil Procedure 26(d), "[e]xcept in categories of proceedings exempted from initial disclosure under Rule 26(a)(1)(E), or when authorized under these rules or by order or agreement of the parties, a party may not seek discovery from any source before the parties have conferred as required by Rule 26(f)." None of the exceptions are met here, and a Rule 26(f) conference has not taken place. Accordingly, the subpoenas are defective on their face.

Please immediately confirm that you will withdraw both subpoenas. Rokoko reserves all rights to object to the propriety of the subpoenas on other grounds, including without limitation as to relevance and privacy.

Best,

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080

Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong Kong | Houston | Kazakhstan | London | **Los Angeles** | Miami | Munich | New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai | Silicon Valley | Singapore | Tysons | Washington DC | Wilmington

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Wednesday, August 6, 2025 5:34 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H. <EGraue@reedsmith.com>; Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

See attached

From: Matthew R. Walsh <matthew@winteryear.com>

Sent: Monday, August 4, 2025 4:18 PM

To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.' <EGraue@reedsmith.com>; 'Valencia, Heather R.' <HValencia@ReedSmith.com>; 'Galibois, Michael B.' <MGalibois@reedsmith.com>

Subject:

For the upcoming hearing do you intend to appear remotely or in person?

Thank you

Matthew R. Walsh

Sent via [BlackBerry Hub+ Inbox for Android](#)

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021

EXHIBIT L

Valencia, Heather R.

From: Ellena, Katherine J.
Sent: Monday, September 29, 2025 3:34 PM
To: matthew@winteryear.com
Cc: Graue, Emily H.; Galibois, Michael B.
Subject: RE: Re:

Mr. Walsh:

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

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, September 29, 2025 2:29 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

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

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

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

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Monday, September 29, 2025 2:11 PM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

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

Thanks,

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, September 29, 2025 12:13 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

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

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

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

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

Thank you
Matthew R. Walsh

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Monday, September 29, 2025 11:50 AM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

You will be able to order a copy of the transcript from the licensed court reporter directly, which is why we said we would provide you with the contact information. The court reporter tomorrow will be Andy Rodriguez and his email address is andyrodriquezcsr@gmail.com, which we just received from the court reporting service.

Part of the Rule 26 conference requires the parties to discuss anticipated discovery, which necessarily includes the various subpoenas that you have recently tried to issue. You have informed us that you are not willing to discuss those subpoenas during tomorrow's conference so we will address that with the Court as appropriate.

Regards,

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, September 26, 2025 7:05 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Ms. Ellena,

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

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

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

Thanks
Matt

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Friday, September 26, 2025 12:02 PM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

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

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

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, September 26, 2025 11:49 AM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

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

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

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

Thank you
Matthew R. Walsh

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Friday, September 26, 2025 11:24 AM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

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

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

Regards,

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

ReedSmith LLP

515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct: 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax: 213.457.8080 Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich

| New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond | San Francisco | Shanghai | Silicon Valley | Singapore | Tysons | Washington DC | Wilmington

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, September 22, 2025 7:37 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Ms. Ellena,

You have had the subpoenas for several days prior and could have sought to confer before my clearly noted unavailability window. As I previously stated, and as you have seen from my auto-responder, I am entirely unavailable until September 30, but remain available on or after that date to confer for any purposes you require.

For the sake of professional economy, we may consolidate multiple topics on the 30th. However, due to past issues, I require a written mutual stipulation in advance identifying the topics to be covered, and a written stipulation afterward confirming what was covered, for any such occurrence to constitute a valid meet and confer. This requirement will be foregoing for the remainder of this case.

Thank you,
Matthew R. Walsh

On 2025-09-22 18:25, Ellena, Katherine J. wrote:

> Mr. Walsh –
>
> I am following up on my below email. Please advise as to your
> availability for a meet and confer.
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: Ellena, Katherine J.
> Sent: Thursday, September 18, 2025 5:45 PM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh:
>
> Rokoko intends to move to quash and for a protective order regarding
> the recently served subpoenas to Docusign, Trifork, Naver-Z, Internet
> Archive, Wikimedia, and Corridor Digital. Please advise as to your
> availability tomorrow to meet and confer regarding the same.
>

> Best Regards,
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Monday, September 15, 2025 5:28 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> Another subpoena issued.
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Monday, September 15, 2025 1:15 PM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh:
>
> Please advise as to your availability this Thursday or Friday for a
> Rule 26(f) conference.
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Friday, September 12, 2025 10:08 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>

> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> The Court's order (Dkt. 71, n.1) expressly authorizes discovery now.
> I remain available to confer under Rule 26(f) at your earliest
> convenience. As the Court has ordered, discovery has begun.
>
> Regarding the Reply/Reply All issue, that was my error — I simply
> clicked Reply instead of Reply All. thank you for confirming receipt.
>
>
> Finally, I must note for the record that I have preserved evidence of
> anonymous online postings and edits concerning me specifically and
> this litigation, including records identifying the originating IP
> address in Denmark and correlating details sufficient to identify the
> source.
>
> These materials accuse me of defamation against your clients and
> making false statements and accusations, which is improper and
> prejudicial. I will be maintaining this evidence and will present it
> to the Court at the appropriate time. I implore you to discuss with
> your clients the issues surrounding such activities or making such
> statements.
>
> Thank you,
> Matthew R. Walsh
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Friday, September 12, 2025 8:49 PM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh,
>
> As we mentioned before, any form of discovery is premature prior to
> the occurrence of a Rule 26(f) conference, which the parties have not
> conducted. _See_ Fed. R. Civ. Pro. 26(d) (stating “[a] party may not
> seek discovery from any source before the parties have conferred as
> required by Rule 26(f).”); _see also_ Lombana v. Green Tree Servicing,
> LLC_, 2016 U.S. Dist. LEXIS 187611, at *2-3 (C.D. Cal. 2016) (holding
> that when the parties have not met and conferred concerning a
> discovery plan, discovery requests are premature); _Babakhanlou v. Los
> Angeles Cnty_, 2024 U.S. Dist. LEXIS 219792, at *3 (C.D. Cal. 2024)
> (same); _LeSzczyński v. Kitchen Cube LLC_, 2024 U.S. Dist. LEXIS
> 75252, at *5-7 (C.D. Cal. 2024) (same).
>
> At no time have the parties held a Rule 26(f) conference, as a Rule
> 26(f) conference specifically addresses the creation of a discovery
> plan. On September 9, 2025, Judge Wright issued a Notice of Intent to
> Issue a Scheduling Order on November 17, 2025, with the instruction
> that the parties meet and confer pursuant to Rule 26(f) 21 days prior
> to that date. (Dkt. 71). Since then, you have served RFAs,
> Interrogatories, and RFPs on my client, in addition to multiple
> additional subpoenas on DocuSign. Until that Rule 26(f) conference has
> been held, your discovery requests, including the subpoenas, are

> premature. While I am traveling this week for an unrelated matter, I
> will respond to you with my availability to conduct a Rule 26(f)
> conference as soon as I am able. In the interim, Rokoko reserves all
> rights to move to quash and/or seek a protective order over the
> improper discovery requests that you continue to serve.
>
> As a logistical matter, please refrain from sending emails to my
> executive assistant, Heather Valencia, only. As an attorney of record
> for this matter, I ask that I be copied on any email that you send
> regarding this matter.
>
> Thanks,
>
> Kat
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Tuesday, September 9, 2025 2:42 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> Hello everyone,
>
> As you have seen, I have withdrawn my requests for remand/vacatur.
> This case will proceed in federal court, which I now believe is the
> proper and most efficient forum.
>
> Judge Wright has set November 17, 2025 as the date by which a
> Scheduling Order will issue. Under Rule 26(f), we will need to meet
> and confer no later than 21 days prior to that date. Please let me
> know your availability so we can coordinate.
>
> Plaintiff's claims under the DMCA and Copyright Act expose your
> clients to substantial damages, potentially in the hundreds of
> millions of dollars, in addition to supplemental state-law claims.
> That exposure will only increase as discovery proceeds and as the
> record is clarified.
>
> I intend to move for summary judgment at the first appropriate
> opportunity and I am confident that my currently held evidence,
> admissions and the record already supports my claims to a degree of

> inevitability. With that in mind, I remain open to discussing early
> resolution to avoid unnecessary litigation expenses.
>
> Thank you
> Matthew R. Walsh
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Thursday, August 7, 2025 8:36 AM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh:
>
> Presently, both of your subpoenas directed to Docusign are premature.
> Per Federal Rule of Civil Procedure 26(d), "[e]xcept in categories of
> proceedings exempted from initial disclosure under Rule 26(a)(1)(E),
> or when authorized under these rules or by order or agreement of the
> parties, a party may not seek discovery from any source before the
> parties have conferred as required by Rule 26(f)."
> None of the exceptions are met here, and a Rule 26(f) conference has
> not taken place. Accordingly, the subpoenas are defective on their
> face.
>
> Please immediately confirm that you will withdraw both subpoenas.
> Rokoko reserves all rights to object to the propriety of the subpoenas
> on other grounds, including without limitation as to relevance and
> privacy.
>
> Best,
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
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> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Wednesday, August 6, 2025 5:34 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> See attached
>
> From: Matthew R. Walsh <matthew@winteryear.com>

> Sent: Monday, August 4, 2025 4:18 PM
> To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.'
> <EGraue@reedsmith.com>; 'Valencia, Heather R.'
> <HValencia@ReedSmith.com>; 'Galibois, Michael B.'
> <MGalibois@reedsmith.com>
> Subject:
>
> For the upcoming hearing do you intend to appear remotely or in
> person?
>
> Thank you
>
> Matthew R. Walsh
>
> Sent via BlackBerry Hub+ Inbox for Android [1]
>
> This E-mail, along with any attachments, is considered confidential
> and may well be legally privileged. If you have received it in error,
> you are on notice of its status. Please notify us immediately by reply
> e-mail and then delete this message from your system. Please do not
> copy it or use it for any purposes, or disclose its contents to any
> other person. Thank you for your cooperation.
>
> RSUSv12021
>
> Links:
> -----
> [1] <http://play.google.com/store/apps/details?id=com.blackberry.hub>

EXHIBIT M



Driving progress
through partnership

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

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

September 25, 2025

By Electronic Mail

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

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

Dear Mr. Walsh,

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

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

- DocuSign: the two DocuSign subpoenas are improper because they violate privacy interests, seek information that is irrelevant, and are grossly overbroad and unduly burdensome.
- Trifork: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.
- Naver Z: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.
- Internet Archive: this subpoena is improper because it seeks information that is irrelevant, grossly overbroad and unduly burdensome.
- Wikimedia: this subpoena is improper because it seeks information that is irrelevant and is grossly overbroad and unduly burdensome.
- Corridor: this subpoena is improper because it seeks confidential commercial information, seeks information that is irrelevant, and is grossly overbroad and unduly burdensome.

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

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

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

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

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

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

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

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C. The Subpoenas Seek Documents That Are Wholly Irrelevant To This Action

“Although irrelevance is not among the litany of enumerated reasons for quashing a subpoena found in Rule 45, courts have incorporated relevance as a factor when determining motions to quash a subpoena.” *Moon v. SCP Pool Corp.*, 232 F.R.D. 633, 637 (C.D. Cal. 2005). “Any analysis of ‘relevance’ in the context of discovery must be squarely grounded in the specific claims and defenses at issue in the case.” *New Prime, Inc. v. Prime Grp. Holdings LLC*, 2024 U.S. Dist. LEXIS 58322, at *34 (C.D. Cal. March 28, 2024); *see also* Fed. R. Civ. P. 26(b)(1). When a subpoena is directed to a non-party, the standards for discovery “require a stronger showing of relevance than for simple party discovery.” *Monster Energy Co. v. Vital Pharm., Inc.*, 2020 U.S. Dist. LEXIS 87320, at *16 (C.D. Cal. March 10, 2020).

Multiple of the Subpoenas you issued seek information that is not related to any claim in this case. You stated that the subpoena you issued to Wikimedia was to “uncover the identity of one of the anonymous usernames outright accusing me of defaming your client” in a September 13, 2025 email. As stated above, discovery must be grounded in specific claims or defenses in the action, and that is clearly not the case here. *New Prime*, 2024 U.S. Dist. LEXIS 58322, at *34. You have not pled a cause of action for defamation. This subpoena is simply a fishing expedition being used for a personal, unsupported vendetta and is wholly irrelevant to the issues in this action.

Additionally, the subpoena directed to Corridor pertaining to a podcast it apparently posted on July 25, 2025 discussing this case is similarly irrelevant to the claims asserted in this action. Further, Corridor is a third party that creates its own content. Rokoko was not involved in the creation of that podcast in any way. You will not be allowed to go on a fishing expedition for irrelevant documents simply because you are personally affronted that third parties commented on information that you made publicly available and invited commentary on.

The documents sought from DocuSign, Naver Z, and Trifork are also irrelevant. “A subpoena does not seek relevant information simply because it will determine one way or the other whether the non-party has relevant information. That is not the standard for relevance.” *Sky Fin. & Intel., LLC v. Cliq, Inc.*, 2024 U.S. Dist. LEXIS 185989, at *3 (C.D. Cal. Sept. 24, 2024).

D. The Subpoenas Are Overbroad And Unduly Burdensome

Rule 45 states that a court must quash or modify a subpoena that, inter alia, “subjects a person to undue burden.” See Fed. R. Civ. P. 45(d)(3)(A). The “‘concern for the unwanted burden thrust upon non-parties is a factor entitled to special weight in evaluating the balance of competing needs’ in a Rule 45 inquiry.” *In re Subpoena to Kingswood Cap. Mgmt., L.P.*, 2024 U.S. Dist. LEXIS 240253, at *6 (C.D. Cal. Dec. 16, 2024).

The Subpoenas here are grossly overbroad. A subpoena is facially overbroad where the subpoena uses language that has no meaningful limitation. One example of such a subpoena is one seeking “any documents” that “relate to” a particular topic. *See Premier v. Corestaff Services, L.P.*, 232 F.R.D. 692 (M.D. Fla. 2005) (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”

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

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

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

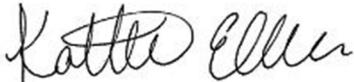
If these Subpoenas are not withdrawn, Rokoko will file a Motion to Quash and ask the Court to issue a protective order to bar you from issuing further defective, irrelevant, and unduly burdensome subpoenas. Fed. R. Civ. P. 26(c)(1) permits a court to issue a protective order “to protect a party or person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

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

Best,

A handwritten signature in black ink, appearing to read "Katherine J. Ellena". The signature is fluid and cursive, with the first name being the most prominent.

Katherine J. Ellena
Reed Smith LLP

KJE:jv

EXHIBIT N

Valencia, Heather R.

From: Matthew R. Walsh <matthew@winteryear.com>
Sent: Friday, September 26, 2025 5:09 PM
To: Ellena, Katherine J.
Cc: Graue, Emily H.; Galibois, Michael B.
Subject: Re:
Attachments: IMG_20250926_170433_035.jpg

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

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

Sent via BlackBerry Hub+ Inbox for Android

Original Message

From: matthew@winteryear.com
Sent: September 26, 2025 12:16 PM
To: KEllena@reedsmith.com
Cc: EGraue@reedsmith.com; MGalibois@reedsmith.com
Subject: RE: Re:

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

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

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

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

Thanks
Matt

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Friday, September 26, 2025 12:02 PM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B. <MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

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

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

Katherine J. Ellena | Senior Associate
kellena@reedsmith.com

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Friday, September 26, 2025 11:49 AM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B.
<MGalibois@reedsmith.com>
Subject: RE: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

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

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

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

Thank you
Matthew R. Walsh

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

From: Ellena, Katherine J. <KEllena@reedsmith.com>
Sent: Friday, September 26, 2025 11:24 AM
To: matthew@winteryear.com
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B.
<MGalibois@reedsmith.com>
Subject: RE: Re:

Mr. Walsh:

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

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

Regards,

Katherine J. Ellena | Senior Associate

kellena@reedsmith.com

ReedSmith LLP

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

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

From: matthew@winteryear.com <matthew@winteryear.com>
Sent: Monday, September 22, 2025 7:37 PM
To: Ellena, Katherine J. <KEllena@reedsmith.com>
Cc: Graue, Emily H. <EGraue@reedsmith.com>; Galibois, Michael B.
<MGalibois@reedsmith.com>
Subject: Re:

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Ms. Ellena,

You have had the subpoenas for several days prior and could have sought to confer before my clearly noted unavailability window. As I previously stated, and as you have seen from my auto-responder, I am entirely unavailable until September 30, but remain available on or after that date to confer for any purposes you require.

For the sake of professional economy, we may consolidate multiple topics on the 30th. However, due to past issues, I require a written mutual stipulation in advance identifying the topics to be covered, and a written stipulation afterward confirming what was covered, for any such occurrence to constitute a valid meet and confer. This requirement will be foregoing for the remainder of this case.

Thank you,
Matthew R. Walsh

On 2025-09-22 18:25, Ellena, Katherine J. wrote:

> Mr. Walsh –

>

> I am following up on my below email. Please advise as to your
> availability for a meet and confer.

>

> Katherine J. Ellena | Senior Associate kellena@reedsmith.com

>

> ReedSmith LLP

> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080

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> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington

>

> From: Ellena, Katherine J.

> Sent: Thursday, September 18, 2025 5:45 PM

> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;

> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.

> <MGalibois@reedsmith.com>

> Subject: RE: RE:

>
> Mr. Walsh:
>
> Rokoko intends to move to quash and for a protective order regarding
> the recently served subpoenas to Docusign, Trifork, Naver-Z, Internet
> Archive, Wikimedia, and Corridor Digital. Please advise as to your
> availability tomorrow to meet and confer regarding the same.
>
> Best Regards,
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Monday, September 15, 2025 5:28 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> Another subpoena issued.
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Monday, September 15, 2025 1:15 PM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh:
>
> Please advise as to your availability this Thursday or Friday for a
> Rule 26(f) conference.
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |

> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Friday, September 12, 2025 10:08 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> The Court's order (Dkt. 71, n.1) expressly authorizes discovery now.
> I remain available to confer under Rule 26(f) at your earliest
> convenience. As the Court has ordered, discovery has begun.
>
> Regarding the Reply/Reply All issue, that was my error — I simply
> clicked Reply instead of Reply All. thank you for confirming receipt.
>
>
> Finally, I must note for the record that I have preserved evidence of
> anonymous online postings and edits concerning me specifically and
> this litigation, including records identifying the originating IP
> address in Denmark and correlating details sufficient to identify the
> source.
>
> These materials accuse me of defamation against your clients and
> making false statements and accusations, which is improper and
> prejudicial. I will be maintaining this evidence and will present it
> to the Court at the appropriate time. I implore you to discuss with
> your clients the issues surrounding such activities or making such
> statements.
>
> Thank you,
> Matthew R. Walsh
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Friday, September 12, 2025 8:49 PM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh,
>
> As we mentioned before, any form of discovery is premature prior to
> the occurrence of a Rule 26(f) conference, which the parties have not
> conducted. See Fed. R. Civ. Pro. 26(d) (stating "[a] party may not
> seek discovery from any source before the parties have conferred as
> required by Rule 26(f)."); see also Lombana v. Green Tree Servicing,
> LLC, 2016 U.S. Dist. LEXIS 187611, at *2-3 (C.D. Cal. 2016) (holding
> that when the parties have not met and conferred concerning a
> discovery plan, discovery requests are premature); Babakhanlou v. Los
> Angeles Cnty, 2024 U.S. Dist. LEXIS 219792, at *3 (C.D. Cal. 2024)
> (same); LeSzczyński v. Kitchen Cube LLC, 2024 U.S. Dist. LEXIS
> 75252, at *5-7 (C.D. Cal. 2024) (same).
>
> At no time have the parties held a Rule 26(f) conference, as a Rule

> 26(f) conference specifically addresses the creation of a discovery
> plan. On September 9, 2025, Judge Wright issued a Notice of Intent to
> Issue a Scheduling Order on November 17, 2025, with the instruction
> that the parties meet and confer pursuant to Rule 26(f) 21 days prior
> to that date. (Dkt. 71). Since then, you have served RFAs,
> Interrogatories, and RFPs on my client, in addition to multiple
> additional subpoenas on DocuSign. Until that Rule 26(f) conference has
> been held, your discovery requests, including the subpoenas, are
> premature. While I am traveling this week for an unrelated matter, I
> will respond to you with my availability to conduct a Rule 26(f)
> conference as soon as I am able. In the interim, Rokoko reserves all
> rights to move to quash and/or seek a protective order over the
> improper discovery requests that you continue to serve.
>
> As a logistical matter, please refrain from sending emails to my
> executive assistant, Heather Valencia, only. As an attorney of record
> for this matter, I ask that I be copied on any email that you send
> regarding this matter.
>
> Thanks,
>
> Kat
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
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> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Tuesday, September 9, 2025 2:42 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>
>
>
> -----
>
> Hello everyone,
>
> As you have seen, I have withdrawn my requests for remand/vacatur.
> This case will proceed in federal court, which I now believe is the
> proper and most efficient forum.
>
> Judge Wright has set November 17, 2025 as the date by which a
> Scheduling Order will issue. Under Rule 26(f), we will need to meet
> and confer no later than 21 days prior to that date. Please let me
> know your availability so we can coordinate.
>
> Plaintiff's claims under the DMCA and Copyright Act expose your

> clients to substantial damages, potentially in the hundreds of
> millions of dollars, in addition to supplemental state-law claims.
> That exposure will only increase as discovery proceeds and as the
> record is clarified.
>
> I intend to move for summary judgment at the first appropriate
> opportunity and I am confident that my currently held evidence,
> admissions and the record already supports my claims to a degree of
> inevitability. With that in mind, I remain open to discussing early
> resolution to avoid unnecessary litigation expenses.
>
> Thank you
> Matthew R. Walsh
>
> From: Ellena, Katherine J. <KEllena@reedsmith.com>
> Sent: Thursday, August 7, 2025 8:36 AM
> To: matthew@winteryear.com; Graue, Emily H. <EGraue@reedsmith.com>;
> Valencia, Heather R. <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE: RE:
>
> Mr. Walsh:
>
> Presently, both of your subpoenas directed to Docusign are premature.
> Per Federal Rule of Civil Procedure 26(d), "[e]xcept in categories of
> proceedings exempted from initial disclosure under Rule 26(a)(1)(E),
> or when authorized under these rules or by order or agreement of the
> parties, a party may not seek discovery from any source before the
> parties have conferred as required by Rule 26(f)."
> None of the exceptions are met here, and a Rule 26(f) conference has
> not taken place. Accordingly, the subpoenas are defective on their
> face.
>
> Please immediately confirm that you will withdraw both subpoenas.
> Rokoko reserves all rights to object to the propriety of the subpoenas
> on other grounds, including without limitation as to relevance and
> privacy.
>
> Best,
>
> Katherine J. Ellena | Senior Associate kellena@reedsmith.com
>
> ReedSmith LLP
> 515 Flower St., Suite 4300 | Los Angeles, CA 90071 | Direct:
> 213.457.8254 | Cell: 424.302.1476 | Reception: 213.457.8000 | Fax:
> 213.457.8080
> Abu Dhabi | Atlanta | Athens | Austin | Beijing | Brussels | Century
> City | Chicago | Dallas | Denver | Dubai | Frankfurt | Greece | Hong
> Kong | Houston | Kazakhstan | London | Los Angeles | Miami | Munich |
> New York | Paris | Philadelphia | Pittsburgh | Princeton | Richmond |
> San Francisco | Shanghai | Silicon Valley | Singapore | Tysons |
> Washington DC | Wilmington
>
> From: matthew@winteryear.com <matthew@winteryear.com>
> Sent: Wednesday, August 6, 2025 5:34 PM
> To: Ellena, Katherine J. <KEllena@reedsmith.com>; Graue, Emily H.
> <EGraue@reedsmith.com>; Valencia, Heather R.
> <HValencia@ReedSmith.com>; Galibois, Michael B.
> <MGalibois@reedsmith.com>
> Subject: RE:
>

> External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

>

>

> -----

>

> See attached

>

> From: Matthew R. Walsh <matthew@winteryear.com>

> Sent: Monday, August 4, 2025 4:18 PM

> To: 'Ellena, Katherine J.' <KEllena@reedsmith.com>; 'Graue, Emily H.'

> <EGraue@reedsmith.com>; 'Valencia, Heather R.'

> <HValencia@ReedSmith.com>; 'Galibois, Michael B.'

> <MGalibois@reedsmith.com>

> Subject:

>

> For the upcoming hearing do you intend to appear remotely or in

> person?

>

> Thank you

>

> Matthew R. Walsh

>

> Sent via BlackBerry Hub+ Inbox for Android [1]

>

> This E-mail, along with any attachments, is considered confidential
> and may well be legally privileged. If you have received it in error,
> you are on notice of its status. Please notify us immediately by reply
> e-mail and then delete this message from your system. Please do not
> copy it or use it for any purposes, or disclose its contents to any
> other person. Thank you for your cooperation.

>

> RSUSv12021

>

> Links:

> -----

> [1] <http://play.google.com/store/apps/details?id=com.blackberry.hub>

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT
for the
Central District of California

Matthew R. Walsh

Plaintiff

Rokoko Electronics and DOES 1 - 50 Inclusive
Defendant

Civil Action No. 2:25-cv-05340-ODW-RAO

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

To: Corridor Digital, LLC, C/O Jake Watson 2458 HUNTER STREET, STUDIO 4, LOS ANGELES, CA 90021
(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Produce all communications between [Corridor Digital, it's employees, affiliates, agents] and Rokoko Electronics, Rokoko Care, CoCo Care, or ReedSmith LLP (Apr 1, 2025-present) regarding the lawsuit, discovery, or production of documents and/or admissions.

Date and Time:

Place: Remit to: matthew@winteryear.com

* Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Date and Time:

Place:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(e), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/15/2025

CLERK OF COURT

OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Matthew R. Walsh, who issues or requests this subpoena, are:
Matthew R. Walsh plaintiff in pro per
19197 Golden Valley Rd #333, Santa Clarita, CA 91350; (661) 644-0012; matthew@winteryear.com

Notice to the person who issues or requests this subpoena
If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT O

1 Lisa J. Yang (SBN 208971)
Lisa.Yang@LimNexus.com
2 Jungji Choi (SBN 314117)
Jungji.Choi@LimNexus.com
3 LIMNEXUS LLP
4 707 Wilshire Boulevard, 46th Floor
Los Angeles, CA 90017
5 Telephone: (213) 955-9500
Facsimile: (213) 955-9511
6
7 Attorneys for
Naver Z USA, Inc.

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 MATTHEW R. WALSH, an individual,
12
13 Plaintiff, *Pro Se*

14 vs.

15 ROKOKO ELECTRONICS; and DOES 1-
16 50, Inclusive,
17 Defendants.

Case No.: 2:25-cv-05340-ODW-RAO
[Assigned to Hon. Otis D. Wright, II]

**OBJECTIONS OF NON-PARTY NAVER Z
USA, INC. TO PLAINTIFF’S SUBPOENA
[FRCP 45(d)(2)(B)]**

18 Complaint Filed: June 12, 2025
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1 **OBJECTIONS OF NON-PARTY NAVER Z USA, INC. TO PLAINTIFF’S SUBPOENA**

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

7 **GENERAL OBJECTIONS**

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

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

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

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

27 ///

28 ///

CERTIFICATE OF SERVICE

1 UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

2 I am employed in the county of Los Angeles, State of California. I am over the age of 18
3 years and not a party to the within action; my business address is 707 Wilshire Boulevard, 46th
4 Floor, Los Angeles, California 90017. On October 3, 2025, I served the documents listed below
on the parties in this action:

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

6 on the interested parties in this action addressed as follows:

<p>7 Matthew R. Walsh 28435 Ascent Way 8 Santa Clarita, CA 91350 9 661-644-0012 Email: matthew@winteryear.com</p>	<p><i>Plaintiff, PRO SE</i></p>
<p>10 Katherine Jane Ellena 11 Reed Smith LLP 515 South Flower Street, Suite 4300 12 Los Angeles, CA 90071 213-457-8000 13 Fax: 213-457-8080 Email: kellena@reedsmith.com</p> <p>14 Emily Graue 15 Reed Smith LLP 16 10 S Wacker Drive Floor 40 Chicago, IL 60606 17 312-207-1000 18 Fax: 312-207-6400 Email: erague@reedsmith.com</p>	<p><i>Attorneys for Defendant</i></p>

20 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s)
21 to be sent from e-mail address bill.castleberry@limnexus.com to the persons at the e-mail
address(es) listed above. I did not receive within a reasonable time after the transmission,
any electronic message or other indication that the transmission was unsuccessful.

22 I declare under penalty of perjury under the laws of the State of California that the above is
23 true and correct.

24 Executed on October 3, 2025, at Los Angeles, California.

25 

26 Bill Castleberry

EXHIBIT P

Valencia, Heather R.

From: matthew@winteryear.com
Sent: Friday, October 3, 2025 11:02 AM
To: 'Bill Castleberry'; Ellena, Katherine J.; erague@reedsmith.com
Cc: 'Lisa Yang'; 'Paul Kim'; 'Jungji Choi'
Subject: RE: Matthew R. Walsh vs. Rokoko Electronics, et al. - C.D. Cal. Case No. 2:25-cv-05340-ODW-RAO | Objections of Non-Party Naver Z USA, Inc. To Plaintiff's Subpoena
Attachments: 0fd7938a-4fd4-4c45-a08a-161a6afa16cf_Certificate_of_Completion.pdf

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Hi Ms. Yang / Mr. Choi,

I've reviewed your objections and am narrowing the subpoena to remove any possible burden. The following categories cover what I need (for now)

1. All emails or correspondence between any Naver Z personnel and anyone at Rokoko (e.g., @rokoko.com) from January 1, 2022 to present.
2. Any contracts, statements of work, purchase orders, or payment records between any Naver Z entity and Rokoko.
3. Any presentations, attachments, or shared files that Rokoko provided to Naver Z concerning animation or mocap data.
4. Any internal Naver Z documents or emails discussing how Rokoko's animation data was used, tested, or integrated into Naver Z products or systems.

Attached is a DocuSign envelope executed by Chang Kim, establishing that Naver Z's CEO personally entered into agreement(s) with Rokoko. That evidence confirms the company's custody and control of these materials at the highest level under Rule 45. As he is the CEO of both companies, and he himself entered into agreements with the Defendant, the corporate structure is not a shield for noncompliance.

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

Further, there is nothing ambiguous about "animation data". It is highly specific, about as specific as "video recording" or "sound recording". The terms "AI" and "machine learning" are also highly specific.

Please confirm that a search will be run using these parameters, or provide a short verification describing the custodians, systems, and terms searched and confirming whether responsive materials exist.

I have a motion to compel drafted presently, if you do not wish to comply just let me know and we can let the judge decide based on the record and evidence I possess already.

Thank you,
Matthew R. Walsh

From: Bill Castleberry <bill.castleberry@limnexus.com>
Sent: Friday, October 3, 2025 10:24 AM
To: matthew@winteryear.com; kellen@reedsmith.com; erague@reedsmith.com
Cc: Lisa Yang <lisa.yang@limnexus.com>; Paul Kim <Paul.Kim@limnexus.com>; Jungji Choi <jungji.choi@limnexus.com>
Subject: Matthew R. Walsh vs. Rokoko Electronics, et al. - C.D. Cal. Case No. 2:25-cv-05340-ODW-RAO | Objections of Non-Party Naver Z USA, Inc. To Plaintiff's Subpoena

Good afternoon,

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

Thank you.

Bill Castleberry
Legal Assistant



LIMNEXUS LLP
Attorneys At Law

707 Wilshire Boulevard 46th Floor
Los Angeles CA 90017 USA
Main: +1.213.955.9500
Direct: +1.213.784.4574

LimNexus.com

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

Certificate Of Completion

Envelope Id: 0FD7938A4FD44C45A08A161A6AFA16CF

Status: Completed

Subject: Rokoko Electronics ApS - 020224

Source Envelope:

Document Pages: 133

Signatures: 59

Envelope Originator:

Certificate Pages: 8

Initials: 0

Anne-Sophie Gammelgaard Andersen

AutoNav: Enabled

Højbro Plads 10, 2. (office 207)

Envelopeld Stamping: Enabled

nil

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Copenhagen K, Copenhagen 1200

aga@highbridge.dk

IP Address: 82.192.175.2

Record Tracking

Status: Original

Holder: Anne-Sophie Gammelgaard Andersen

Location: DocuSign

2/2/2024 3:19:44 AM

aga@highbridge.dk

Signer Events**Signature****Timestamp**

Allan M. Hansen

allan.hansen@nordiskfilm.com

Security Level: Email, Account Authentication
(None)

DocuSigned by:


D5EBDB13E77E406...

Sent: 2/2/2024 5:09:25 AM

Viewed: 2/3/2024 5:39:11 AM

Signed: 2/3/2024 5:39:33 AM

Signature Adoption: Pre-selected Style

Using IP Address: 87.52.108.15

Electronic Record and Signature Disclosure:

Accepted: 2/3/2024 5:39:11 AM

ID: 32e40e88-3600-4bca-90c0-f1bf80d822ff

Anders Kullmann Klok

anders@rokoko.com

Security Level: Email, Account Authentication
(None)

DocuSigned by:


FBB5064222954CE...

Sent: 2/2/2024 5:09:25 AM

Viewed: 2/3/2024 11:51:25 AM

Signed: 2/3/2024 11:53:43 AM

Signature Adoption: Drawn on Device

Using IP Address: 80.208.66.153

Signed using mobile

Electronic Record and Signature Disclosure:

Accepted: 2/3/2024 11:51:25 AM

ID: 0313e45b-d7c7-4497-aa6a-74fe59892bb0

Brett Bibby

brett@straythought.com

Security Level: Email, Account Authentication
(None)

DocuSigned by:


1048BFB48CAE45D...

Sent: 2/2/2024 5:09:26 AM

Resent: 2/5/2024 12:05:24 AM

Viewed: 2/5/2024 12:06:14 AM

Signed: 2/5/2024 12:06:34 AM

Signature Adoption: Uploaded Signature Image

Using IP Address: 80.161.48.148

Electronic Record and Signature Disclosure:

Accepted: 2/5/2024 12:06:14 AM

ID: 8cb48002-ad23-4916-9892-11fba05cc86d

Chang Kim

dl_naverzcontract@naverz-corp.com

CEO

NAVER Z Limited

Security Level: Email, Account Authentication
(None)

DocuSigned by:


EEF48BE796F94F6...

Sent: 2/2/2024 5:09:31 AM

Resent: 2/5/2024 12:05:24 AM

Resent: 2/6/2024 2:49:01 AM

Resent: 2/6/2024 3:49:13 AM

Viewed: 2/6/2024 3:50:20 AM

Signed: 2/6/2024 3:50:35 AM

Signature Adoption: Uploaded Signature Image

Using IP Address: 211.249.71.131

Electronic Record and Signature Disclosure:

Accepted: 2/6/2024 3:50:20 AM

ID: 7a50820e-70a1-4b80-b44f-6194cf597992

Signer Events	Signature	Timestamp
<p>Mikkel Lucas Overby mikkel@rokoko.com COO Security Level: Email, Account Authentication (None)</p>	<p>DocuSigned by: <i>Mikkel Lucas Overby</i> 93D7DF68261E4B0...</p> <p>Signature Adoption: Pre-selected Style Using IP Address: 87.48.131.206</p>	<p>Sent: 2/2/2024 5:09:29 AM Viewed: 2/2/2024 5:10:42 AM Signed: 2/2/2024 5:52:49 AM</p>

Electronic Record and Signature Disclosure:
Accepted: 2/2/2024 5:10:42 AM
ID: 4288541d-58cd-4d92-b838-258c1fe3e3e4

Per Zachariassen
per.zachariassen@skylark.dk
Security Level: Email, Account Authentication (None)

DocuSigned by:
Per Zachariassen
FC72AB554761488...

Signature Adoption: Pre-selected Style
Using IP Address: 176.78.172.89
Signed using mobile

Sent: 2/2/2024 5:09:29 AM
Resent: 2/5/2024 12:05:28 AM
Viewed: 2/5/2024 1:10:19 AM
Signed: 2/5/2024 1:11:33 AM

Electronic Record and Signature Disclosure:
Accepted: 2/5/2024 1:10:19 AM
ID: 51e17f14-28a3-4b00-9307-ded78c3a28dc

Randall Stowell
randy@thearcherysf.com
Founder
Security Level: Email, Account Authentication (None)

DocuSigned by:
Randall Stowell
ECF88D3D7C2E4F0...

Signature Adoption: Pre-selected Style
Using IP Address: 98.159.37.224

Sent: 2/2/2024 5:09:29 AM
Resent: 2/5/2024 12:05:28 AM
Viewed: 2/5/2024 11:10:14 AM
Signed: 2/5/2024 11:10:38 AM

Electronic Record and Signature Disclosure:
Accepted: 2/5/2024 11:10:14 AM
ID: d2742e13-38f8-4297-a018-322150366385

Søren Munk Hansen
smh@highbridge.dk
Attorney-at-Law
Highbridge Advokatanpartsselskab
Security Level: Email, Account Authentication (None)

DocuSigned by:
Søren Munk Hansen
6391786C9F9E42C...

Signature Adoption: Pre-selected Style
Using IP Address: 82.192.175.2

Sent: 2/2/2024 5:09:24 AM
Viewed: 2/2/2024 5:11:07 AM
Signed: 2/2/2024 5:35:24 AM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

Thomas Visti Jensen
tv@vistiunlimited.com
Security Level: Email, Account Authentication (None)

DocuSigned by:
Thomas Visti Jensen
12EC920C422C426...

Signature Adoption: Pre-selected Style
Using IP Address: 80.208.2.138

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Resent: 2/5/2024 12:05:29 AM
Viewed: 2/5/2024 12:18:15 AM
Signed: 2/5/2024 12:23:07 AM

Electronic Record and Signature Disclosure:
Accepted: 2/2/2024 6:00:37 AM
ID: 666df1bf-93d7-4108-9928-7138c3cc97be

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp
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Carbon Copy Events	Status	Timestamp
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<p>Chang Kim dl_naverzcontract@naverz-corp.com CEO NAVER Z Limited Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Accepted: 2/6/2024 3:50:20 AM ID: 7a50820e-70a1-4b80-b44f-6194cf597992</p>	<div style="border: 2px solid blue; padding: 5px; font-weight: bold; color: blue; font-size: 1.2em;">COPIED</div>	<p>Sent: 2/2/2024 5:09:31 AM Viewed: 2/6/2024 12:56:42 AM</p>
<p>Ditte Lundberg dlu@eifo.dk Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Accepted: 2/2/2024 5:31:32 AM ID: d87d5ca9-c6a9-47e3-abf6-5142089b1986</p>	<div style="border: 2px solid blue; padding: 5px; font-weight: bold; color: blue; font-size: 1.2em;">COPIED</div>	<p>Sent: 2/2/2024 5:09:23 AM Viewed: 2/2/2024 5:15:19 AM</p>
<p>Silas Kondrup sk@nev.nu Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Not Offered via DocuSign</p>	<div style="border: 2px solid blue; padding: 5px; font-weight: bold; color: blue; font-size: 1.2em;">COPIED</div>	<p>Sent: 2/2/2024 5:09:23 AM Viewed: 2/2/2024 5:33:11 AM</p>

Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
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Envelope Summary Events	Status	Timestamps
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Envelope Sent	Hashed/Encrypted	2/2/2024 5:09:32 AM
Envelope Updated	Security Checked	2/2/2024 5:29:31 AM
Envelope Updated	Security Checked	2/2/2024 5:29:31 AM
Envelope Updated	Security Checked	2/6/2024 2:49:00 AM
Certified Delivered	Security Checked	2/5/2024 12:18:15 AM
Signing Complete	Security Checked	2/5/2024 12:23:07 AM
Completed	Security Checked	2/6/2024 6:42:29 AM

Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure
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ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

From time to time, Highbridge (we, us or Company) may be required by law to provide to you certain written notices or disclosures. Described below are the terms and conditions for providing to you such notices and disclosures electronically through the DocuSign system. Please read the information below carefully and thoroughly, and if you can access this information electronically to your satisfaction and agree to this Electronic Record and Signature Disclosure (ERSD), please confirm your agreement by selecting the check-box next to 'I agree to use electronic records and signatures' before clicking 'CONTINUE' within the DocuSign system.

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Withdrawing your consent

If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

Consequences of changing your mind

If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

All notices and disclosures will be sent to you electronically

Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

How to contact Highbridge:

You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

To contact us by email send messages to: kro@highbridge.dk

To advise Highbridge of your new email address

To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at kro@highbridge.dk and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

If you created a DocuSign account, you may update it with your new email address through your account preferences.

To request paper copies from Highbridge

To request delivery from us of paper copies of the notices and disclosures previously provided by us to you electronically, you must send us an email to kro@highbridge.dk and in the body of such request you must state your email address, full name, mailing address, and telephone number. We will bill you for any fees at that time, if any.

To withdraw your consent with Highbridge

To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:

i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;

ii. send us an email to kro@highbridge.dk and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

Required hardware and software

The minimum system requirements for using the DocuSign system may change over time. The current system requirements are found here: <https://support.docusign.com/guides/signer-guide-signing-system-requirements>.

Acknowledging your access and consent to receive and sign documents electronically

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

By selecting the check-box next to ‘I agree to use electronic records and signatures’, you confirm that:

- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify Highbridge as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by Highbridge during the course of your relationship with Highbridge.

EXHIBIT Q

Valencia, Heather R.

From: matthew@winteryear.com
Sent: Friday, October 3, 2025 11:28 AM
To: 'Bill Castleberry'; Ellena, Katherine J.; erague@reedsmith.com
Cc: 'Lisa Yang'; 'Paul Kim'; 'Jungji Choi'
Subject: RE: Matthew R. Walsh vs. Rokoko Electronics, et al. - C.D. Cal. Case No. 2:25-cv-05340-ODW-RAO | Objections of Non-Party Naver Z USA, Inc. To Plaintiff's Subpoena

External E-Mail - FROM matthew@winteryear.com <matthew@winteryear.com>

Hi Ms. Yang / Mr. Choi,

For reference, I reviewed NAVER Corporation's 2022 ESG Integrated Report, which confirms that NAVER consolidates operations and reporting across all global subsidiaries, including those engaged in content and metaverse initiatives such as ZEPETO. The report states that its disclosure scope encompasses "*all global subsidiaries and overseas business sites.*"

This means any Naver Z entity or affiliate operates under centralized reporting and data control. Accordingly, Naver Z cannot claim that responsive documents fall outside its possession, custody, or control. NAVER already aggregates information enterprise-wide for ESG and compliance purposes.

Given NAVER's multi-billion-dollar revenue and integrated systems, production of the limited materials I requested cannot reasonably be considered burdensome. The corporate structure does not insulate Naver Z from discovery obligations tied to its own CEO's agreements with Rokoko especially when their own reporting documents show commingling and data transparency between all subsidiaries.

Please confirm that a search is being conducted consistent with these facts.

Thank you,
Matthew R. Walsh

From: Bill Castleberry <bill.castleberry@limnexus.com>
Sent: Friday, October 3, 2025 10:24 AM
To: matthew@winteryear.com; kellena@reedsmith.com; erague@reedsmith.com
Cc: Lisa Yang <lisa.yang@limnexus.com>; Paul Kim <Paul.Kim@limnexus.com>; Jungji Choi <jungji.choi@limnexus.com>
Subject: Matthew R. Walsh vs. Rokoko Electronics, et al. - C.D. Cal. Case No. 2:25-cv-05340-ODW-RAO | Objections of Non-Party Naver Z USA, Inc. To Plaintiff's Subpoena

Good afternoon,

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

Thank you.

Bill Castleberry
Legal Assistant



LIMNEXUS LLP
Attorneys At Law

707 Wilshire Boulevard 46th Floor
Los Angeles CA 90017 USA
Main: +1.213.955.9500
Direct: +1.213.784.4574

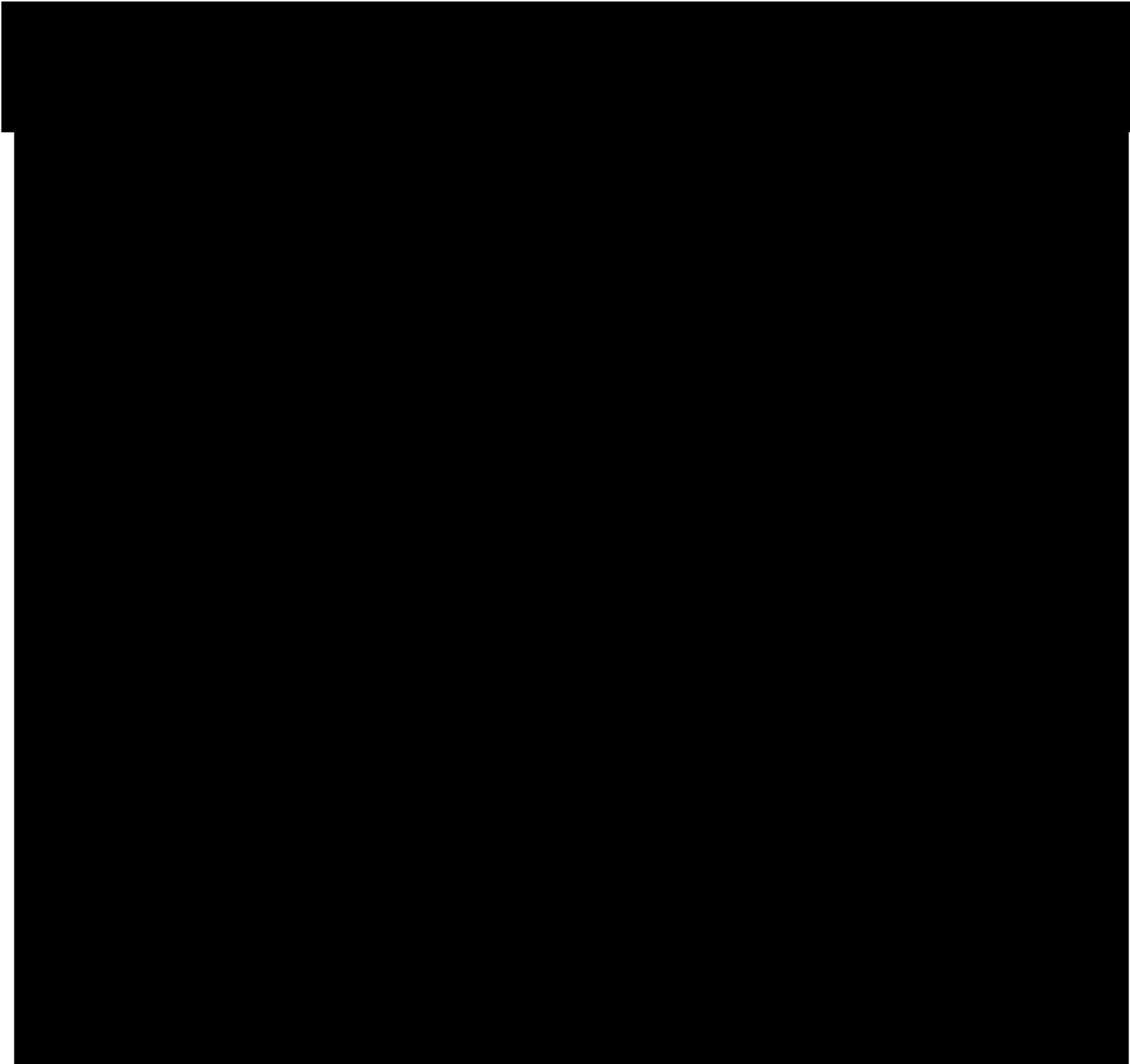
LimNexus.com

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EXHIBIT R

Valencia, Heather R.

From: [REDACTED]
Sent: Friday, September 26, 2025 1:19 AM
To: Ellena, Katherine J.
Cc: Galibois, Michael B.; Graue, Emily H.; Rueter, Nicholas C.; Jakob Balslev
Subject: Fwd: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO
Attachments: Subpoena.pdf 2.pdf



Begin forwarded message:

From: <matthew@winteryear.com>
Subject: RE: Subpoena dated September 12, 2025 re: Civil Action No.: 2:25-CV-05340-ODW-RAO
Date: September 23, 2025 at 9:36:44 PM PDT
To: "Jake Molland" <jake.molland@boundlegal.com>

Jake,

Please consider speaking further to members of your staff. You have claimed to me after the issuance of a lawful order “the Company has determined that neither it nor its subsidiaries have had any relevant communications or interactions with Rokoko Electronics or Rokoko Care or CoCo Care”

However...

That’s unfortunately a large problem for everyone. Your company was put on litigation hold on 5/14/2025

Further, your own website contradicts your statements: <https://trifork.com/2024/06/trifork-invests-in-rokoko-care-to-advance-ai-based-physiotherapy/>

As do your interim reports: <https://investor.trifork.com/wp-content/uploads/sites/4/2025/08/Trifork-25Q2-Interim-report.pdf>

This is the address I served you at:

This is the address on the subpoena

I possess not one, but multiple authenticated DocuSign materials including but not limited to the one below that directly contradict your statements and definitively prove otherwise:

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

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

Please govern yourself accordingly.

Matthew R. Walsh
Plaintiff in pro per

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

Mr. Walsh:
I represent Trifork US Inc. (the "Company") with respect to the subpoena to produce documents dated September 12, 2025 (attached). After conducting a records search, the Company has determined that neither it nor its subsidiaries have had any relevant communications or interactions with Rokoko Electronics or Rokoko Care or CoCo Care and that it has no documents responsive to the subpoena in its possession, custody, or control. Therefore, the Company is unable to produce any documents or information relevant to the subpoena request.

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

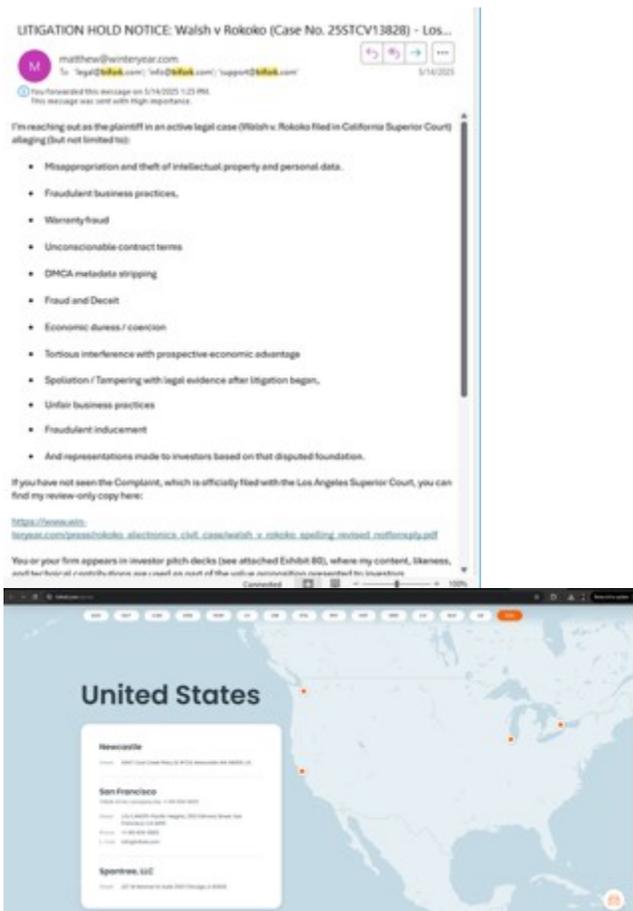
Best,

Jake Molland | Bound Legal Strategy

m 734.717.2359

e jake.molland@boundlegal.com

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AD-988 (Rev. 03/16) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT
 for the

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

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

To: **cto CANOPY Pacific Heights, 2193 Filmore Street, San Francisco, CA 94115**

(Name of person to whom this subpoena is directed)

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material. Produce in native format with metadata all agreements, payments, communications, or documents sufficient to show how Tribotk US, Inc. (or it's subsidiaries) and (Rokoko Electronics or Rokoko Care or CoCo Care) exchanged or used animation/mousap data, machine learning, or artificial intelligence from Jan. 1, 2020-present.

DocuSign

Certificate Of Completion

Subject: Case Care App - Rules of Procedure for the Board
 Status: Completed

2025-10-15/2025
 Document Pages: 7 Signatures: 3 Envelope Originator:
 Certificate Pages: 5 Initials: 0 Andrew Lindgaard-Holgaard
 Author: Created Høfde Plads 10, 2 (office 207)
 Envelopes Generated: Created or
 Time Zone: (UTC-08:00) Pacific Time (US & Canada) Copenhagen N (Copenhagen 1000)
 IP Address: 92.162.175.2

Record Tracking

Name: Original Host: Andrew Lindgaard-Holgaard Location: DocuSign
 9/10/2024 4:20:50 AM ahl@hplindgaard.dk

Signer Events

Signature	Timestamp
Karen Signatum Jørgensen kjo@tribotk.com Security Level: Email, Account Authentication (None)	Sent: 9/10/2024 4:26:50 AM Received: 9/10/2024 4:18:43 AM Viewed: 9/10/2024 10:20:43 PM Signed: 9/10/2024 12:21:37 PM
Signature Adoption (Drawn on Device) Using IP Address: 87.48.43.173	

Electronic Record and Signature Details:
 Accepted: 9/10/2024 10:20:43 PM
 ID: 77766263-07142be-0be-8d0222817c

Name: **Andrew Lindgaard-Holgaard**
 Initials: **Andrew Lindgaard**
 Security Level: Email, Account Authentication (None)
 Signature Adoption: Pre-selected Style
 Using IP Address: 92.162.175.2

Electronic Record and Signature Details:
 Accepted: 9/10/2024 4:26:50 AM
 ID: 77766263-07142be-0be-8d0222817c

Name: **Matthew R. Walsh**
 Initials: **Matthew R. Walsh**
 Security Level: Email, Account Authentication (None)
 Signature Adoption: Pre-selected Style
 Using IP Address: 87.48.131.208