

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

5 Plaintiff In Pro Per,

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

MATTHEW R. WALSH

Plaintiff In Pro Per,

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50,  
INCLUSIVE)

Defendant

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

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

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

**DECLARATION ISO OBJECTION  
TO DEFENDANTS MOTION TO  
QUASH – SECTION D**

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10 **DECLARATION ISO OBJECTION TO DEFENDANTS MOTION TO**  
11 **QUASH – SECTION D**  
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13 I, Matthew R. Walsh, declare as follows:  
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15 I am the Plaintiff in this action. I have personal knowledge of the facts set  
16 forth herein and, if called as a witness, could and would testify competently  
17 thereto.

18 In the interest of judicial economy, the point by point rebuttals/objections to  
19 Defendant’s motion to quash have been collapsed into section letter-delimited  
20 declarations A through G to correspond with the opposition and Defendants  
21 motion.

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23 **Re: [D] The Subpoenas Seek Documents That**  
24 **Are Wholly Irrelevant To This Action**

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26 1. **Claim:** *“Plaintiff has not pled a cause of action for defamation, nor is*  
27 *defamation an available defense. This Subpoena is simply a fishing*  
28 *expedition Plaintiff is using for a personal vendetta and is wholly*  
29 *irrelevant to the issues in this action.”*

30 **Reality:** This is not a fishing expedition, it’s a dive to the Titanic; precise  
31 and specific with a singular focus. There is no personal vendetta. Plaintiff  
32 still has no actual understanding of who Corridor Digital is – or what  
33 they do; and has never heard the name before being accused of  
34 harassment in this matter. Defendant chose to bring them into this action

35 and both parties continue to harm Plaintiff greatly. Further, Corridor  
36 Digital and Defendant have publicly acknowledged their collaboration  
37 regarding this case (see Dkt. 75 p.6 l.20); (Dkt 73-1, Exhibit 22). The  
38 subpoena is narrowly tailored to obtain evidence supporting sanctions  
39 and a protective order based on their coordinated public statements,  
40 which continue to harm Plaintiff’s personal and professional reputation.

41 **But for Defendant’s funding and direction of Corridor concerning**  
42 **this litigation, no such harm would have occurred, and no subpoenas**  
43 **would have been necessary.**

44  
45 2. **Claim:** *“The documents sought from DocuSign, Naver, and Trifork are*  
46 *also irrelevant. They seek “all” information from the non-parties, not*  
47 *just information pertaining to Plaintiff.”*

48 **Reality:** Plaintiff cannot discern the meaning of this statement as written.  
49 This case concerns Defendant’s scheme to monetize motion-capture user  
50 data by converting its customer base into a source of proprietary content  
51 and intellectual property, which it then resold to investors and partners.  
52 Defendant and these entities have publicly acknowledged that business  
53 model since 2022 (Compl. Ex. 75-87), which is how they attracted mass  
54 investment and achieved a valuation exceeding \$250 million.

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Defendant has never rebutted these facts – in fact – they admit the intellectual property misappropriation activity publicly now that the lawsuit has brought it to light (Exhibit C). The requested documents are therefore directly relevant to proving that enterprise, its investors’ knowledge, and the resulting damages. **But for Defendant’s concealment of these transactions and refusal to answer RFA’s, RFP’s and interrogatories these subpoenas would not have been necessary.**

3. **Claim:** *“Plaintiff has not explained how the information he seeks is relevant.”*

**Reality:** Defendant selectively chooses which pieces of evidence, arguments and statements they wish to read and ignores the ones which could be too adverse to answer. All of this was expressly shared in (Dkt #80, attachment 3) and well plead since the Complaint and through every filing since (Compl. ¶ 84-91) , (Compl. Ex. 87, 97, 98, 154).

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

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76 Executed on October 16, 2025, in Santa Clarita, California.



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Matthew R. Walsh  
Plaintiff in pro per

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