

1 MATTHEW R. WALSH  
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5 Plaintiff In Pro Per,

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

MATTHEW R. WALSH

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

Plaintiff In Pro Per,

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

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50,  
INCLUSIVE)

Date: November 19, 2025

Time: 10:00 a.m.

Place: Dept. 590

Defendant

**PLAINTIFFS OBJECTION TO  
DEFENDANTS MOTION TO  
QUASH**

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9 **PLAINTIFF'S OBJECTION TO DEFENDANTS**

10 **MOTION TO QUASH**

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**INTRODUCTION**

Defendant’s latest delay tactic disguised as a motion is moot; as it is duplicative and is therefore a waste of judicial resources. Plaintiff has already filed a Motion to Compel (Dkt #80) which addresses all of Defendant’s contentions. The issues raised are identical to those already briefed.

Should Defendant wish to prevent their enforcement, they could have simply objected to his Motion to Compel; but they chose instead to file a motion to quash at the 11<sup>th</sup> hour on the day production deadlines were due to once again obstruct all discovery.

Rather than waste additional judicial resources, Plaintiff consolidates lengthy, substantive rebuttals into attached Declarations A–G, incorporated herein by reference.

28 **DEFENDANTS MOTION IS WHOLLY DEFECTIVE**

29 **IT MUST BE STRICKEN**

30  
31 **1. LOCAL RULE / COURT ORDER VIOLATIONS**

32 Defendant's motion is defective as it violates the following Local Rules

33 a. L.R. 7-3 – No meet and confer before filing any motions

34 b. L.R. 37-1 – No prefiling conference relating to discovery

35 L.R. 11-3.2 – Line numbering is not continuous

36 c. L.R. 11-6.1 – Table of contents is inaccurate *again* and only goes  
37 to page 18 out of a 26 page document. Page numbers do not line up  
38 with content.

39 d. Court Order Dkt #71 – Footnotes must be used sparingly

40 e. L.R. 11-6.2 - *Another* false word count / certification – Defendant  
41 claims their filing has 5,659 words, however it is actually 6,620.

42  
43 **2. PRIOR COURT ORDERS DEMANDS THE MOTION BE**

44 **STRICKEN AND SANCTIONS BE ORDERED**

45 Due to Defendant's consistent failures to abide by Local Rules, a prior  
46 Court order (Dkt #71) states: "*Filings that do not conform to the Local*  
47 *Rules and this Order will not be considered*" and (Dkt #39) states

48           *“Further filings that fail to comply with applicable rules or that are*  
49           *otherwise inappropriate will be summarily stricken, and the Court will*  
50           *not hesitate to impose monetary sanctions in cases where the violations*  
51           *are particularly egregious or repeated.”* As Plaintiff’s Motion for  
52           Sanctions and Motion to Compel demonstrate, both are warranted here.

53

54           **3. NO PRIOR MEET AND CONFER**

55           Defendant’s motion was made with no prior conference as required by  
56           Local Rule 37-1 and Local Rule 7-3. This is not error, Defendant stated  
57           they would not participate in any meet and confers and in fact, in the 6  
58           months and 80+ docket entries they have only participated in one on June  
59           26, 2025 after days of Plaintiff begging for it. Despite Local Rule 7-3  
60           requiring 7 days before filing a motion, they chose to file it within hours  
61           of that meeting. Judge Otis D. Wright II has warned Defendant multiple  
62           times and still they persist doing whatever they wish before this Court in  
63           clear contempt for it’s rules. Court Order (Dkt #58) specifically stated  
64           *“The Court cautions the parties that they are expected to conduct*  
65           *themselves with civility and professionalism. All parties shall work*  
66           *together and coordinate their filings and actions as necessary”*

67

68 **4. DEFENDANT USED AI-GENERATED CASELAW AGAIN**

69 Plaintiff had filed a Request for Judicial Notice (Dkt #77, Exhibit 7, p23)  
70 about the same exact “authorities” Defendant used in this motion.

71 Defendant continued to rely on that false caselaw again, even providing  
72 Plaintiff with the LEXIS pdf files they relied on -- and once again – it  
73 proved the case to be AI hallucinated as detailed in (Dkt #80, Attachment  
74 4, p5, line 102). This is not a mistake, since it’s already part of the record  
75 – Defense is purposely reusing it to create noise on the record, hoping to  
76 relitigate that matter here and further to obstruct and delay the case from  
77 progressing. **It should not be lost on the Court, Defendants never**  
78 **opposed or controverted the RJN and therefore it’s contents is now**  
79 **deemed accepted.**

80  
81 **5. DEFENDANT USED AI, CONFUSED JUDGES NAME**

82 Ironically, Defendant’s footnote on the final page (likely to have the final  
83 word in Plaintiff’s opposition be noise) states: [**In each of his filings in**  
84 **this case to date**, Plaintiff continues to disregard this Court’s instruction  
85 that “[a]ny party who uses generative artificial intelligence (such as  
86 ChatGPT,Harvey, CoCounsel, or Google Bard) to generate any portion  
87 of a brief, pleading, or other filing must attach to the filing a separate

88 *declaration disclosing the use of artificial intelligence and certifying that*  
89 *the filer has reviewed the source material and verified that the artificially*  
90 *generated contact is accurate and complies with the filer’s Rule 11*  
91 *obligations.”] See Hon. R. Oliver Procedures, 14”. The presiding judge*  
92 **in each of Plaintiffs filings to date** has been Otis D. Wright II. Once  
93 again, Defendant’s [copy – paste – and file] use of AI has confused Otis  
94 for Oliver and included Oliver’s standing order as Otis’ when in fact, this  
95 is the first time any filing of Plaintiff’s will have been directed to the  
96 magistrate judge. Defendant’s use of AI is a matter of record and has  
97 remained unopposed. Plaintiff is seeking \$20,000 in damages, costs and  
98 restitution for Defendant’s continued use and the problems caused by it.  
99 (Dkt #80, attachment 5).

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107

**DEFENDANTS ARGUMENTS VS REALITY**

6. As outlined in Plaintiff’s Motion for Sanctions (Dkt. #73) and Reply (Dkt. #78), Defendant’s filings continue a clear pattern of factual misrepresentation and procedural obstruction. This motion serves the same purpose—to delay discovery and divert attention from ongoing evidentiary issues identified in prior filings, including suspected

108 spoliation by Defendant and now, its third-party collaborators.

109 **Defendant has never denied those allegations on the record.** As usual,  
110 Defendant is doubling down in their abuses on this docket, anything to  
111 avoid discovery and most certainly – anything to avoid reaching the  
112 merits.

113  
114 **Re: (A) Rokoko Has Standing To Move To Quash The Subpoenas.**

115  
116 7. This matter has already been fully addressed in Plaintiff’s Motion to  
117 Compel (*see Dkt #80, p.18-29*). In the interest of judicial economy, a  
118 point by point rebuttal has been collapsed and attached hereto (*see*  
119 *Declaration ISO Objection to Defendant’s Motion to Quash –*  
120 *SECTION A*)

121  
122 **Re: (B) The First Attempt Subpoenas Were Issued By Plaintiff In Pro Per,**  
123 **Not By The Clerk Of Court, And Are Facially Defective.**

124  
125 8. Defendant misunderstands how subpoenas work for pro pers. The clerk  
126 does not *issue* subpoenas whatsoever. They do not even print them. The  
127 Court is not involved in any subpoena process beyond one: signature and

128 stamp. A pro per simply needs to print any number of *their own*  
129 subpoenas, **which can even be entirely blank**, and bring them to the  
130 clerk window for stamp/signature. Neither the clerk, nor the Court verify,  
131 vet, review or validate any subpoena or it's content.

132

133 9. **Claim:** *“Accordingly, the First Attempt Subpoenas are clearly defective*  
134 *on their face and should be quashed for this reason alone.”*

135 **Reality:** This statement makes no logical sense. If the only issue was a  
136 missing clerk signature which is issued blindly without regard for what  
137 the subpoena asks or to whom; then upon signing and reissuing, the  
138 original subpoenas no longer exist, they are void and cannot be quashed.  
139 As Defendant is well aware and has been for some time, **all third-parties**  
140 **now possess clerk signed/stamped subpoenas. This argument is moot.**

141

142 **Re: (C) The Subpoenas Seek Rokoko's Confidential Commercial**  
143 **Information And Violate Individual Privacy Interests**

144 **10.** This matter has already been fully addressed in Plaintiff's Motion to  
145 Compel (*see Dkt #80, p.18-29*). In the interest of judicial economy, a  
146 point by point rebuttal has been collapsed and attached hereto (*see*

147 *Declaration ISO Objection to Defendant’s Motion to Quash –*

148 *SECTION C)*

149  
150 **Re: [D] The Subpoenas Seek Documents That**

151 **Are Wholly Irrelevant To This Action**

152  
153 *1. This matter has already been fully addressed in Plaintiff’s Motion to*  
154 *Compel (see Dkt #80, attachment 3). In the interest of judicial economy,*  
155 *a point by point rebuttal has been collapsed and attached hereto (see*  
156 *Declaration ISO Objection to Defendant’s Motion to Quash –*  
157 *SECTION D)*

158  
159 **Re: (E) The Subpoenas Are Overbroad And Unduly Burdensome**

160  
161 *2. This matter has already been fully addressed in Plaintiff’s Motion to*  
162 *Compel (see Dkt #80, p.22-24).*

163  
164 *3. Defendant cannot decide what is burdensome to third parties as a matter*  
165 *of law as Courts have routinely found. “[e]ven if a party has standing to*  
166 *challenge a subpoena directed to a third party on privilege grounds, he*

167 may not challenge that subpoena on the grounds that the information  
168 imposes an undue burden on the subpoenaed party.” (Pub. Serv. Co. of  
169 Okla., 2011 WL 691204, at \*4.)

170  
171 4. **Claim:** “*The Subpoenas here are grossly overbroad. A subpoena is*  
172 *facially overbroad where the subpoena uses language that has no*  
173 *meaningful limitation. One example of such a subpoena is one seeking*  
174 *“any documents” that “relate to” a particular topic.*”

175 **Reality:** All subpoenas have “meaningful limitation” each affixed with a  
176 narrow date range from dates plead in the Complaint (~2022 – now). This  
177 very Court continually states in denials to quash that defendant cannot  
178 oppose to “any and all communications” as overbroad, rather they may  
179 only [“*interpose reasonable objections to “any and all” communications*  
180 *based on the date of the communications.”]* (Meek v. Ward, No. 2:21-  
181 CV-00216-450 HL, 2022 WL 19977542, at \*2 (D. Or. Feb. 3, 2022)) and  
182 since the time period is narrowly focused to claims within this action, it is  
183 not overbroad.

184  
185 **Re: (F) The Second Attempt Subpoenas Seek Clearly Privileged Information**

187 5. Much to Defendant’s dismay, the “second attempt subpoenas” are 1:1 the  
188 exact same subpoenas as the “first attempt subpoenas”. No difference in  
189 requests whatsoever. (Dkt #80-1, Exhibit 15)

190  
191 **Re: (G) This Court Should Issue A Protective Order Barring Plaintiff From**  
192 **Serving Further Subpoenas Without Approval From The Court**

193  
194 6. Finally, through all the noise -- **Defendant gets to the point:** *“If Plaintiff*  
195 *is not barred from making these defective requests, he will continue to do*  
196 *so, harassing Rokoko and causing an undue burden on non-parties in this*  
197 *case.”*

198  
199 7. Again, Defendant cannot claim undo burden for a third-party as a matter  
200 of law (Meek v. Ward, No. 2:21-CV-00216-450 HL, 2022 WL  
201 19977542, at \*2 (D. Or. Feb. 3, 2022)).

202  
203 8. Further, Plaintiff respectfully asks the Court to recognize that  
204 Defendant’s have **refused** to meet and confer endlessly, have **refused** to  
205 even engage in a simple 26(f) conference, have **refused** to answer  
206 Requests for Admission, have **refused** to answer Requests for

207 Production, have **refused** to answer Interrogatories. It's not just that they  
208 wish to shield their investors and cohorts from liability at all costs; but  
209 they don't want to participate in this matter at all and will do anything to  
210 avoid it: [~89 false statements, falsified evidence, AI fabricated caselaw,  
211 spoliating evidence x2, altering Secretary of State records to hide the true  
212 nerve center 4 days after evidence is presented to the court, ghostwriting  
213 declarations, forging signatures, refusal to meet and confer, refusal to  
214 participate or allow discovery, etc.] (Dkt #73), (Dkt #78)

215  
216 9. Through all the noise in their Section G paragraphs – Plaintiff simply  
217 offers the Court a candid interpretation of Defendant's long-winded  
218 pleading of the Court **to assist them in preventing any future discovery**  
219 **from occurring before the last final drops of any Defense possibility**  
220 **is exhausted:** *“Your honor, the Plaintiff did what he said he'd do in the*  
221 *Complaint. He used discovery to attempt to uncover incontrovertible*  
222 *evidence of what we are accused of and how our investors and third*  
223 *parties are involved in our alleged intellectual property harvesting*  
224 *enterprise. Judge, please prevent him from looking under the hood at all*  
225 *costs or he'll be able to back up his already extensive forensic, public,*  
226 *unrebutted and uncontroverted and expressly admitted evidence.*

227 *Everyone who paid us to be involved in this money making operation will*  
228 *be exposed further and we can't have that happen."*

229  
230 10. The bottom line is, Defendant is fully aware an MSJ is prepared and  
231 ready to be filed in this matter. The evidence both on and off the record,  
232 is already sufficient to succeed on summary judgment. As Defendant  
233 pulled the ripcord at the 11<sup>th</sup> hour in state Court to dodge a summary  
234 judgment there, they are manipulating the Court to do so here as well.  
235 Defendant has no interest in litigation, or reaching the merits; they are  
236 simply fighting now for containment and appeal posture and to shield  
237 investors and cohorts from liability. This absurd request is their  
238 emergency brake and is wholly contrary to law.

239

240 **PRAYER FOR RELIEF**

241 Plaintiff respectfully requests the Court:

242

- 243 1. **STRIKE** Defendant's motion to quash for failure to meet and confer and  
244 containing AI fabricated caselaw and false statements.

245

246 2. **SANCTION** Defendant under Rule 11 and prior Court order for repeated  
247 offenses.

248  
249 3. In the alternative, **DENY** Defendant's motion for sanctions entirely.

250  
251 4. **GRANT** Plaintiff's motion to Compel in full as it aligns with these same  
252 issues as raised.

253  
254 I declare under penalty of perjury under the laws of the United States of America  
255 that the foregoing is true and correct.

256 Executed this October 16, 2025, in Santa Clarita, California.  
257

258 

259 Matthew R. Walsh  
260 Plaintiff in pro per  
261

262  
263 **CERTIFICATE OF COMPLIANCE**

264  
265 The undersigned, counsel of record for Plaintiff appearing in pro per, certifies that  
266 this brief contains 2,093 words, which complies with the word limit of L.R. 11-6.2.

267