

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

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,

*Hearing date: November 24, 2025
Hearing time: 1:30PM*

Defendant

**NOTICE OF MOTION AND
MOTION FOR
RECONSIDERATION re: MOTION
TO COMPEL**

Filed concurrently with:

- Declaration of Matthew R. Walsh re: Evidentiary package
- Declaration of Matthew R. Walsh re: Failure to Meet and Confer Declaration
- (L.R. 37-2.4(a), L.R. 37-2.4(b) and L.R. 37-2.2)
- Proposed Order

8
9 **NOTICE OF MOTION AND MOTION FOR RECONSIDERATION**
10 **Re: MOTION TO COMPEL**
11

12 **TO THE HONORABLE COURT, DEFENDANT AND THEIR COUNSEL**

13 **OF RECORD: PLEASE TAKE NOTICE** on November 24, 2025, at 1:30 p.m., or

14 as soon thereafter as the matter may be heard before the Honorable Rozella A.

15 Oliver in Courtroom 590 of the United States District Court, Central District of
16 California, located at 255 E Temple St, Los Angeles, CA 90012, Matthew R.
17 Walsh will and hereby does move this Court to reconsider striking Plaintiff’s
18 Motion to Compel for perceived failure to comply with Rules 37-1, 37-2 with the
19 basis of the request for reconsideration that Plaintiff’s motion utilized the filing
20 exception under 37-2.4(a). Plaintiff therefore requests upon Rule 60(b) (“mistake
21 or inadvertence”), Rule 60(b)(3) (“misconduct by opposing party”) and Rule
22 60(b)(6) for the “other reasons” set forth; that the Court reconsider their order and
23 allow Plaintiff’s motion to stand.

24

25

26 **CERTIFICATION OF MEET AND CONFER**

27 Pursuant to the exception provided by L.R. 37-2.4(a), Plaintiff submits the
28 accompanying declaration establishing that he has attempted in good faith to meet
29 and confer with counsel, who has *again* failed to comply timely with both Rules
30 26(f) and the ten-day requirement of L.R. 37-1 and the Court’s prior orders. While
31 the parties agreed they would hold a 26(f) conference, a 7-3, and a 37-1 meet and
32 confer, Defendant refused to meet within the required 10-day window and missed
33 the 21-day deadline for the 26(f) conference. Therefore, this motion is filed to
34 preserve the record. Please see the externally attached declaration titled

35 ***“DECLARATION OF MATTHEW R. WALSH ISO PLAINTIFF’S MOTION***
36 ***FOR RECONSIDERATION [Meet and Confer Declaration].”***

37
38 **INTRODUCTION**

39 Plaintiff respectfully requests that the Court reconsider its prior ruling
40 striking Plaintiff’s Motion to Compel based on a procedural error in not properly
41 considering the L.R. 37-2.4(a) exception for when meet and confer attempts have
42 failed or extended beyond the 37-1 statutory ten-day limit. As noted in (Dkt #83),
43 which states: *“The parties shall not file any discovery motion until they have*
44 *exhausted good faith efforts to resolve or narrow their disputes”*. Despite (Dkt
45 #83) ordering compliance. Defendant has refused to meet and confer within the
46 statutory time limit set by the Docket #71 which states ***“Counsel shall meet at***
47 ***least 21 days in advance of the above date [November 17] to prepare a jointly***
48 ***signed report for the Court”***. Accordingly, the deadline to complete the 26(f)
49 conference has now passed.

50 Plaintiff’s stricken motion was, in fact, filed in accordance with L.R.
51 37-2.4(a) and L.R. 37-1 and pursuant to Rule 60(b)(1), 60(b)(3), and 60(b)(6),
52 Plaintiff respectfully requests that the Court reconsider its decision to strike the
53 motion, reinstate it, and grant relief so that discovery may finally proceed as it

54 should have over 48 days ago, had Defendant not engaged in continued
55 stonewalling.

56 Plaintiff acknowledges the Court’s frustration and candidly feels the
57 same frustration in having to file motions for what should be routine litigation
58 practices. Plaintiff believes that his motion should not have been stricken as it was
59 filed in full compliance and that relief from the Court is essential to allow the case
60 to proceed. This motion seeks to address that and other procedural and related
61 substantial issues.
62

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LEGAL STANDARD

1) Equal Protection (14th Amendment, Section 1 of the Constitution)

- Demands that the Court must apply its laws fairly and cannot treat people differently without a valid reason. Individuals in similar situations should be treated alike under the law. Relevance: Defendant’s MTD has not been stricken yet it violates similar and yet far more Local Rules than any of Plaintiff’s filings which were stricken.

2) L.R. 7-3 –

- Requires a meet-and-confer before filing a motion.

3) L.R. 37-1 –

- Requires a meet-and-confer before filing a discovery motion, prescribes a 10-day statutory compliance limit for the opposing party. If the 10-days passes, L.R. 37-2.4 carves out exceptions.

4) L.R. 37-2 –

- Requires a joint stipulation before filing a discovery motion, and specific procedures for failure to meet and confer **unless** a 37-2.4 declaration is included.

5) L.R. 37-2.2 –

- Requires the timely exchange of portions of the joint stipulation.

- 96 6) **L.R. 37-2.4** –
- 97 • Provides three exceptions allowing the filing of discovery motions if a
- 98 declaration of failure to meet and confer is included.
- 99 7) **L.R. 6-1** –
- 100 • Applies to filing motions, setting time frames, and procedures.
- 101 8) **L.R. 79** –
- 102 • Relates to filings and court records.
- 103 9) **L.R. 7-10** –
- 104 • Relates to the filing of motions and responses.
- 105 10) **L.R. 11-6.2** –
- 106 • Sets the word limit for motions.
- 107 11) **L.R. 37-2.4(a)** –
- 108 • Provides a procedural mechanism for filing discovery motions when
- 109 meet and confer has failed.
- 110 12) **FRCP 26** –
- 111 • General provisions governing discovery.
- 112 13) **FRCP 37** –
- 113 • Provides rules related to failure to make disclosures or cooperate in
- 114 discovery.
- 115 14) **FRCP 45** –

116 • Governs subpoenas in civil litigation.

117 15) **FRCP 60(b) –**

118 • Allows the court to correct mistakes or oversights in judgments or
119 orders.

120 16) **Dkt. #58 –Dkt. #71 –**

121 • Scheduling Order setting the deadline for the Rule 26(f) conference
122 and other procedural matters.

123 17) **(Muhammad v. Jenkins, No. CV 19-7970 JAK (PVC), 2022 WL**
124 **4292341, at *8 (C.D. Cal. Aug. 26, 2022))**

125 • Courts excuse the moving party from meet and confer obligations so long
126 as a declaration is attached attesting to the other parties failures.

127 18) **Chavez v. Equifax Info. Servs., LLC, No. 520CV02282JWHSPX,**
128 **2023 WL 2559208, at *2 (C.D. Cal. Feb. 9, 2023)**

129 • Courts exempt the moving party from meet and confer requirements and
130 joint stipulations when the opposing party refuses to engage. Further,
131 Courts impose sanctions and default Defendant’s discovery requests as
132 uncontested when they refuse to participate. Lastly, Courts require meet
133 and confers to happen within 10 days of notice.

134 19) **Theresa Brooke v. Grand Champions, LLC, No.**

135 **EDCV19133DSFSPX, 2019 WL 8219407, at *2 (C.D. Cal. Sept. 16, 2019)**

- Courts require meet and confers to happen within 10 days of the other party's request and further allow motions to proceed if the other party fails to meet and confer.

20) **Dkt. #83 –**

- Court order requiring Defendant's participation in the 26(f) conference also the order striking Plaintiff's Motion to Compel and Defendant's Motion to Quash for failure to meet and confer.

BACKGROUND

1. On September 9, 2025, this Court issued a minute order (Dkt #71) stating that the parties should actively begin discovery.
2. **On October 10, 2025**, Plaintiff filed a Motion to Compel (Dkt #80) as:
 - a. Defendant was stonewalling all discovery
 - b. Defendant had blanket objected to all discovery over 90 pages
 - c. Refusing to meet and confer since June 26, 2025 (Exhibit B)
 - d. Intervening ex-parte with subpoena recipients instructing them not to comply.
 - e. Defendant AI-fabricated caselaw in their letters and filings
 - f. Refusing to participate in 26(f) due to manufactured conflict

155 g. Cancelled the 26(f) on their own the day before it was to occur
156 (Exhibit B)

157 3. On October 15, 2025, Defendant filed a Motion to Quash (Dkt #81)

158 4. On October 16, 2025, Plaintiff filed an opposition pointing out all the
159 local rules it violated including but not limited to no meet and confer.

160 **5. On October 17, 2025:**

161 a. On October 17, 2025, the Court sua sponte struck Defendant's
162 Motion to Quash for violations, but also struck Plaintiff's Motion
163 to Compel, although it was entirely compliant per L.R. 37-2.4
164 using the exception in (a) and providing a declaration thereof; also
165 demanding compliance with 26(f)

166 b. Plaintiff requested another meet and confer, then sent multiple
167 follow-up emails to seek a meet and confer before the deadlines
168 ran out (Exhibit A).

169 c. Plaintiff supplied his half of the 26(f) joint report, it has not been
170 returned as of now (Exhibit E).

171 **6. As of October 27, 2025, Defendant has been wholly unavailable**
172 **violating the (L.R. 37-1) 10-day max delay limit for meet and confers,**
173 **and the court's 26(f) 21-day scheduling requirement.**

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ARGUMENT

**1. DEFENSE CREATED A PROCEDURAL LOOPHOLE TO STALL
DISCOVERY**

2. The stricken Motion to Compel was written not *despite* Counsel; but rather *because* Counsel refuses at all costs to meet and confer either at all, or without creating/bending/imposing rules. Counsel will stop at nothing to avoid discovery and avoid reaching the merits of this case. **No instance of failing to meet and confer has been due to any negligence or causation of Plaintiff.** It is wholly Defendant’s who continue even today to disregard this Court’s rules and procedures as proven extensively on the record.

3. Plaintiff thereby asks the Court for reconsideration under Rule 60(b) “oversights”, in the event that the Court is unaware of the following:

- a. Presently, discovery is paused as the case is stuck in an infinite loop:
 - 1. Plaintiff must meet and confer before filing;
 - 2. Defendant refuses or delays in bad faith;
 - 3. Plaintiff files a motion with a 37-2.4 declaration;
 - 4. The motion is struck for failure to confer despite compliance;
 - 5. Repeat.

195 **4. LOCAL RULES PROVIDE AN EXCEPTION WHEN ONE SIDE**
196 **REFUSES TO MEET AND CONFER, PLAINTIFF’S MOTION**
197 **COMPLIED**

198 5. Plaintiff believes the Court may have erred in striking his motion to Compel
199 as Local Rules provide a tie-breaker in the event of a motion practice
200 procedural standoff, so that one side cannot simply stonewall indefinitely:

- 201 a. [*“L.R. 37-2.4 Failure to File Joint Stipulation. The Court will not*
202 *consider any discovery motion in the absence of a joint stipulation or*
203 *[a declaration from counsel for the moving party establishing that*
204 *opposing counsel (a) failed to confer in a timely manner¹ under L.R.*
205 *37-1]; (b) failed to provide the opposing party’s portion of the joint*
206 *stipulation in a timely manner under L.R. 37-2.2; or (c) refused to*
207 *sign and return the joint stipulation after the opposing party’s portion*
208 *was added. If such declaration accompanies the motion, then L.Rs. 6-*
209 *1, 79 and 7-10 apply.”*].

¹ Timely manner is defined as ten days (L.R. 37-1)

210 6. **Plaintiffs motion contained exactly that declaration** (Dkt #80, p.2 L.32)
211 making it compliant with Local Rules² and contends that it should have not
212 been stricken.

213 a. Courts routinely allow motions such as Plaintiff’s to proceed
214 under the exemption: [*“Local Rule 37-2.4 provides that where*
215 *opposing counsel fails to meet and confer pursuant to Local Rule 37-1*
216 *or to cooperate in the preparation of a Joint Stipulation, **the moving***
217 *party is excused from filing a Joint Stipulation so long as the motion*
218 *is accompanied by a declaration attesting to opposing counsel's*
219 ***failure to cooperate.** C.D. Cal. L.R. 37-2.4.”*] (*Muhammad v. Jenkins,*
220 *No. CV 19-7970 JAK (PVC), 2022 WL 4292341, at *8 (C.D. Cal. Aug.*
221 *26, 2022)*) (see also *Chavez v. Equifax Info. Servs., LLC, Theresa*
222 *Brooke v. Grand Champions, LLC*)

223 b. Further, Court’s routinely maintain that meetings must be ‘timely’:
224 *“Although [Plaintiff] failed to file the motion to compel in the form of*
225 *a joint stipulation as generally required by Local Rule 37-2,*
226 *[Plaintiff] is **excused from that requirement** here since opposing*

² the motion remained compliant with 6-1, 7-9 and 7-10 as required by 37-2.4(a)

227 *counsel failed to **timely** meet and confer as required by Local Rule 37-*
228 *1. See L.R. 37-2.4.” (Chavez v. Equifax Info. Servs., LLC, No.*
229 *520CV02282JWHSPX, 2023 WL 2559208, at *2 (C.D. Cal. Feb. 9,*
230 *2023)) (see also Muhammad v. Jenkins, Theresa Brooke v. Grand*
231 *Champions, LLC)*

232
233 **7. DUE TO STRIKING THE MOTION TO COMPEL, COURT**
234 **ORDERED DEADLINES HAVE NOW BEEN EXTINGUISHED**

235 8. Most upsettingly, however, the Scheduling Order (Dkt #71) set the
236 **deadline to hold a 26(f) conference on October 27, 2025**. Defendant
237 refused to participate by that date, despite another Court order (Dkt #83)
238 commanding them to do so and L.R. 37-1 requiring they do so within ten
239 days. This is incredibly problematic as the scheduling order was very clear:

240 a. [***The failure to submit a Joint Report in advance of the date set***
241 *forth in the caption may result in the **dismissal of the action, striking***
242 ***the answer and entering a default, or the imposition of sanctions”]***

243 9. Courts routinely allow Motions to Compel to proceed and grant them in
244 cases where Defendant’s refuse to meet and confer within 10 days; precisely
245 as Defendant has here [*Counsel for the opposing party must confer with*
246 *counsel for the moving party **within ten days after the moving party sends a***

247 *letter requesting a conference. Id. As set forth above, [Plaintiff] repeatedly*
248 *attempted to meet and confer regarding the disputes at issue in this motion,*
249 *but [Defendant] failed to respond or otherwise meet her obligation, just as*
250 *she has failed to meet her other discovery obligations”] (Chavez v. Equifax*
251 *Info. Servs., LLC, No. 520CV02282JWHSPX, 2023 WL 2559208, at *2*
252 *(C.D. Cal. Feb. 9, 2023)) (see also Muhammad v. Jenkins, Theresa Brooke*
253 *v. Grand Champions, LLC)*

254 **10.**The Federal Rules of Civil Procedure Rule 26(f) is black-letter law and
255 states “*the parties must confer as soon as practicable—and in any event at*
256 *least 21 days before a scheduling conference is to be held*”. Defendant and
257 their 1,300 lawyer international law firm cannot find the time or resources,
258 once again, to comply with simple statutory deadlines by way of a 10 minute
259 phone call and filling out a basic form within the statutory time limits.

260 **CONCLUSION**

261 Plaintiff respectfully asks the Court to reconsider. Defendant's
262 misconduct continues and as of today, absent the ability to compel them, it will
263 continue to prejudice this case. *As the old saying goes "give an inch, they'll take a*
264 *mile". And Defendant has taken a mile:*

- 265 1. 48 days of early discovery gone; with nothing to show.
- 266 2. Last and only meet and confer: June 26, 2025.
- 267 3. Zero clerk-issued subpoenas complied due to ex-parte interference.
- 268 4. Zero documents returned by Defendant from RFP's.
- 269 5. Zero interrogatories answered.
- 270 6. Zero Requests for Admissions answered without objection.
- 271 7. Ten days passed since this Court ordered mandatory compliance for 37-1
272 meet and confers, subpoena disputes and the 26(f) conference.
- 273 8. Zero days remaining with the Courts 21-day 26(f) requirement.
- 274 9. Zero discovery requests served by Defendant.
- 275 10. Zero evidence which was not Plaintiff-only accumulated.
- 276 11. Three weeks until the scheduling conference with nothing to show for the
277 last 48 days and no remaining time on any statutory deadlines.

279 Defendant's misconduct and liberties taken with the rules is ultra vires. Not
280 only is it well documented on the record, it is never ending. They must be
281 compelled to participate fairly and honestly.

282

283 **THIS COURT GAVE A PRO SE LITIGANT FAR LESS LEEWAY THAN**
284 **DEFENDANT FOR THE SAME BEHAVIOR, EQUITY MUST PREVAIL**

285 In stark mirror-like alignment, this very Court prior heard the case of Denise
286 Chavez (*Chavez v. Equifax Info. Servs., LLC (2023)*), she acted [or lack thereof] in
287 the same ways as Defendant but nowhere near as blatant. She appeared pro se, was
288 not an attorney, was not bound by ethical doctrine and did not take an oath *as*
289 *Defendants did*. However, due to less, yet nearly identical actions as the
290 Defendants; Equifax' Motion To Compel, despite lacking a meet and confer, was
291 allowed to proceed against her under 37-2.4(a) -- just as Plaintiff's must.

292 This Court empowered Equifax to compel Chavez', a stonewalling litigant,
293 to no longer be allowed to delay the proceedings. She was made to answer to the
294 RFP's and interrogatories. Chavez' admissions were deemed admitted. She was
295 sanctioned and shortly after and her case was dismissed. She was pro se and
296 received far less leniency than this same Court has shown Defendant's and their
297 global megafirm.

298 If this very same Court found that was what Chavez deserved, then certainly
299 it is – precisely -- what Defendant’s deserve under the 14th Amendment Section 1
300 legal principal of ‘equal protection’: “*no state shall deny to any person within its*
301 *jurisdiction the equal protection of the laws*”. Chavez, Rokoko, Equifax,
302 ReedSmith, Walsh; equity must exist with laser-level precision across all parties
303 uniformly regardless of who they are or who they are[n’t] represented by.
304

305 **THE RULES MUST BE APPLIED REGARDLESS OF OUTCOME**

306 This Court must simply not give ReedSmith nor Defendants carte blanche to
307 freely dispose of whatever rules or orders they are disinterested in; while holding
308 pro se’s like Plaintiff and Denise Chavez to higher motion-striking and case-ending
309 standards. Even children understand, if you break the rules in a game; you lose.
310 Defendants are not children and this is not a game, but the logic rings just as true
311 here. The Court must hold *them and them alone* responsible for their [in]/actions
312 and not prejudice Plaintiff as collateral fallout for their unified misconduct.

313 [“*the importance of local rules should not be taken so lightly. The local*
314 *rules supplement the federal rules governing civil proceedings ... Accordingly,*
315 *their importance should not be diminished by skirting their application when the*
316 *results prove harsh to a party.*”] (*Carte Blanche (Singapore) v. Diners Club Int'l,*
317 *Inc.*, 130 F.R.D. at 32).

318 In summary: Defendant defied the rules *again* after your order. As the last
319 six months have shown, warnings do not work on them. If the results of applying
320 the rules prove harsh to Defendant, that's the cost of breaking them. Harshness is
321 deserved, they must not be impervious.

322

323 **Plaintiff respectfully asks the Court to act before the harm and**
324 **prejudice is irreparable. That moment is imminently upon the horizon.**

325

326 Plaintiff respectfully prays the Court grant the following relief:

327 1. **REVIVE** Plaintiff's motion to Compel given Defendant's continued
328 obstruction and contempt for these proceedings including their failure to
329 engage in a 26(f) conference by (Dkt #71)'s deadline and given
330 Plaintiff's invocation and following of the filing exception granted in
331 L.R. 37-2.4(a)³

332
333 2. **GRANT** Plaintiff's motion to Compel in full so that Defendant must
334 answer discovery requests and discovery may finally begin

335
336 3. Hold Defendant in **contempt** for their continued misconduct, continued
337 and egregious violations of local rules, refusal to follow FRCP, refusal to
338 meet and confer timely and refusal to follow court orders, surpassing
339 every Court directed deadline at a minimum⁴

340

³ L.R. 37-2.4 "The Court will not consider any discovery motion in the absence of a joint stipulation or a declaration from counsel for the moving party establishing that opposing counsel (a) failed to confer in a timely manner under L.R. 37-1;"

⁴ L.R.-3.2.7 "Misconduct of any attorney in the presence of a court or in any manner in respect to any matter pending in a court may be dealt with directly by the judge in charge of the matter or at said judge's option, referred to the Committee, or both."

341 4. **STRIKE** Defendant’s answer (Dkt #42 “Motion to Dismiss”)

342 a. As warned in a prior Court order⁵ (Dkt #71)⁶ the failure to comply
343 with Rule 26(f), L.R. 37-2.2 at a minimum.

344 b. Which already violates 12 local rules⁷ and should be stricken under
345 ‘equal protection’ *and* as the Court warned and ordered prior^{8, 9}

346 c. Without leave to refile, or file a new answer as warned and ordered
347 by this Court prior¹⁰ in (Dkt #24)

348 d. Enter Clerks **Default** pursuant to Rule 55(a).

349 e. Enable Plaintiff to continue towards resolving this case on the
350 merits under Rule 56 (“**Summary Judgment**”) without any further
351 abuse, obstruction and waste of judicial resources; the motion is
352 complete and ready to file even if further discovery fails.

⁵ “Counsel shall meet at least 21 days in advance of the above date [October 27, 2025] to prepare a jointly signed report for the Court”

⁶ “The failure to submit a Joint Report in advance of the date set forth in the caption may result in the dismissal of the action, **striking the answer and entering a default**, or the imposition of sanctions.”

⁷ (Dkt #74) violates more than the following: 18 U.S. Code § 287 (“Falsified evidence”), Local Rules 7-3 (“failure to meet and confer”), 11-3.1 (“lacking consecutive line numbers”), 7-5(a) (“no memorandum of points and authorities”), 11-7 (“Appendices are mixed with the body”), 11-8 (“headings and subheadings missing”), 11-6.1 (“false word count as it is 14,600 words”), and 11-6.2 (“fraudulent 6,999 word count on certificate”), L.R. 11-8 table of contents doesn’t match pages or page counts, Standing Order: Footnotes must be used sparingly, 37-4 failure to cooperate/comply

⁸ (Dkt #39) “Further **filings that fail to comply with applicable rules** or that are otherwise inappropriate **will be summarily stricken**, and the Court will not hesitate to impose monetary sanctions in cases where the violations are particularly egregious or repeated.”

⁹ (Dkt #71) “Filings that do not conform to the Local Rules and this Order will not be considered”

¹⁰ “the Court sua sponte extends Defendant’s deadline to respond to the complaint to June 26, 2025. **No further extensions will be granted.**”

353 5. **GRANT** Plaintiff the ability to file discovery motions should Defendant
354 continue stonewalling.

355
356 6. **SANCTION** Defendant's for their misconduct as provided by Rule
357 37(d)(1)(A)(ii) and Rule 37(d)(1)(A)(ii).

358
359 I declare under penalty of perjury under the laws of the United States of America
360 that the foregoing is true and correct.

361
362 Executed this October 27, 2025, in Santa Clarita, California.

363
364 

365 Matthew R. Walsh
366 Plaintiff in pro per
367

368

369

370

CERTIFICATE OF COMPLIANCE

371

The undersigned, counsel of record for Plaintiff appearing in pro per, certifies that

372

this brief contains 2,920 words including footnotes, which complies with the word

373

limit of L.R. 11-6.2.

374