

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]*

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

**DECLARATION OF MATTHEW R.
WALSH re: NOTICE OF
COMPLETION OF 26(f)
CONFERENCE, SUBPOENA
DISPUTES AND SUMMARY
JUDGMENT ISO MOTION FOR
RECONSIDERATION**

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10 **DECLARATION OF MATTHEW R. WALSH re: NOTICE OF**
11 **COMPLETION OF 26(f) CONFERENCE, SUBPOENA DISPUTES AND**
12 **SUMMARY JUDGMENT ISO MOTION FOR RECONSIDERATION**
13

14 I, Matthew R. Walsh, declare as follows:

15 I am the Plaintiff in this matter and I am proceeding in pro per.

16 I have personal knowledge of the facts set forth in this declaration and, if called as
17 a witness, could and would testify competently to the matters herein.

18
19 The 26(f) Conference required under Federal Rule of Civil Procedure 26(f)
20 was held on October 30, 2025 from 3pm to about 3:47pm. The parties discussed
21 the matters required by Court. This notice is further issued to the Court in support
22 of Plaintiff's Motion for Reconsideration (Dkt #85), as the Court's requirements
23 have been completed and revival of the Motion to Compel (Dkt #80) should have
24 no legal obstacles.

25
26 **The matters discussed include:**

27 **(first)** discovery and the joint report in full **(second)** Plaintiff's forthcoming
28 motion for summary judgment **(third)** potential amendments to the complaint
29 **(fourth)** settlement discussions **(fifth)** Subpoenas: Despite efforts to resolve issues
30 surrounding subpoenas, no agreement was reached regarding their scope or
31 production. The parties acknowledged the Court's requirement to attempt
32 resolution but no agreement was reached at this time and an agreement will not be
33 possible forthcoming as both parties have determined **(sixth)** settlement
34 discussions, one offer disposing 4 causes is in review presently **(seventh)**

35 Mediation: the parties have agreed to attempt it forthcoming (**eighth**) trial dates,
36 should the matter reach that point (**ninth**) Defendants wish the RJN(s) regarding
37 fabricated/AI caselaw to be withdrawn, Plaintiff opposed and instead referred them
38 to Docket #80-4 which reinforces the prior (**tenth**) protective orders (**eleventh**) a
39 forthcoming defamation suit against Defendant's and Corridor Digital.

40 An accurate and true copy of the summary e-mail is attached as Exhibit A.

41
42 Plaintiff respectfully submits this notice to provide the Court with an update on the
43 status of the case and the parties' efforts to resolve procedural matters as required
44 by Rule 26(f), L.R. 37-1, L.R. 7-3; and further to support his Motion for
45 Reconsideration as the Court's contentions with that filing have been cured.

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47 Respectfully submitted,

48 Dated this October 30, 2025, in Santa Clarita, California.

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50 

Matthew R. Walsh
Plaintiff In Pro Per

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EXHIBIT A

57

58

RE: Re:



matthew@winteryear.com

To 'Ellena, Katherine J.'

Cc 'Graue, Emily H.'; 'Galibois, Michael B.'



4:00 PM

You replied to this message on 10/30/2025 4:14 PM.

Thank you both for your time.

To recap and make a record going forward:

- We discussed in vivid detail the joint 26(f) report
- We discussed the motion for summary judgment moving on all counts plus possible amendments plus alter-ego / veil piercing
- We discussed the subpoenas; unfortunately we did not come to any agreements there but the Court doesn't require us to agree, just to try.
- We discussed you providing the trial dates and other dates, preferably not into 2027/2028.
- We discussed that we would utilize the ADR/mediation provided by the Court.
- We discussed that Rokoko is reviewing the settlement offer and will make a determination by November 15
- We discussed that you wish me to withdraw the RJN about fabricated caselaw and you indicated that you would oppose, I indicated the requisite time to do so has passed and you had disagreed. I further directed you to Docket #80-4 which details the forensic data checks on your LEXIS PDF files showing that the caselaw in fact does not exist as it was written, was misattributed and almost all were from void cases.
- We discussed you will not be open to allowing me additional interrogatories
- We discussed the discovery issues thus-far.
- We discussed that you wish to bifurcate, whereas I do not.
- We discussed that I would provide ESI protocol and a draft order
- We discussed that you wish there to be a protective order on everything. While I can understand some of it, I don't agree with all of it. I am open to compromise.
- We discussed Corridor Digital; some of the evidence I have including express admissions, shared relationships as witnesses who may have been there or know of those dealings, etc.
- We discussed that I intend to ask for leave of court to amend the complaint for defamation, or bring a new suit, and also possibly breach of contract.
- We discussed and agreed on positive, collaborative efforts moving forward.

I don't think I missed anything.

Thank you very much for both of your time,

Matthew R. Walsh

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