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Rokoko Electronics

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 MATTHEW R. WALSH

16 Plaintiff,

17 vs.

18 ROKOKO ELECTRONICS, and
DOES 1 through 50, inclusive,

19 Defendant.
20

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

**MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO THE COMPLAINT**

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1 Pursuant to Federal Rule of Civil Procedure 6, Defendant Rokoko Electronics (“Rokoko”)
2 moves for an enlargement of time up to and including July 10, 2025 to serve their response to the
3 Complaint filed by Plaintiff Matthew R. Walsh (“Plaintiff”), and states as follows:

4 1. On May 12, 2025, Plaintiff filed a 256-page Complaint (“Complaint”) (80 pages not
5 including exhibits) in the Superior Court of California, County of Los Angeles, Case No.
6 25STCV13828 (the “State Court Action”), asserting fourteen separate causes of action, including
7 tortious interference, fraud, intellectual property theft, breach of warranty, and other related claims.

8 2. On May 14, 2025, Rokoko was served with a copy of the Summons and Complaint in
9 the State Court Action.

10 3. On June 12, 2025, Rokoko removed the case to the United States District Court, Central
11 District of California.

12 4. Due to the removal of the case and because Rokoko intends to file a motion to dismiss
13 as to all fourteen causes of action, Rokoko requires additional time to prepare and file its response to
14 Plaintiff’s Complaint.

15 5. Rokoko requests this enlargement to allow it time to adequately investigate and respond
16 to the allegations raised in the Complaint.

17 6. Accordingly, Rokoko respectfully requests a 21-day extension of time to respond to
18 Plaintiff’s Complaint.

19 7. This motion is made in good faith and not for the purpose of delay. Rokoko requests
20 this extension to allow it to adequately respond to the Complaint considering the recent removal of the
21 case to federal court and in light of the fourteen causes of action that are the subject to Rokoko’s
22 forthcoming motion to dismiss.

23 8. On June 12, 2025 Counsel met and conferred with Plaintiff, at which time he indicated
24 that he opposed this motion.

1 WHEREFORE, Defendant Rokoko Electronics respectfully requests the entry of an order
2 enlarging the time in which to serve its response to Plaintiff’s Complaint up to and through July 10,
3 2025, together with such other and further relief as this Court deems just and proper.
4

5 DATED: June 16, 2025

REED SMITH LLP

7 /s/Katherine J. Ellena
8 Michael Galibois (*pro hac vice forthcoming*)
9 Katherine J. Ellena (SBN 324160)
10 Emily Graue (*pro hac vice forthcoming*)

11 *Attorneys for Defendant*
12 *Rokoko Electronics*

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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 515 South Flower Street, Suite 4300, Los Angeles, CA 90071. On June 16, 2025, I served the following document(s) by the method indicated below:

**MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO THE COMPLAINT**

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below. I am readily familiar with the firm’s practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.

by transmitting via email to the parties at the email addresses listed below:

Matthew R. Walsh
19197 Golden Valley Rd #333
Santa Clarita, CA 91387
Email: matthew@winteryear.com

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on June 16, 2025, at Los Angeles, California.



Heather Valencia

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