

MATTHEW R. WALSH
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(661) 644-0012

Plaintiff In Pro Per,

UNITED STATES DISTRICT COURT
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: REBUTTALS TO
DEFENDANTS UNTIMELY
OPPOSITION**

1. REBUTTALS TO HER FLAGRANTLY IMPROPER OPPOSITION

a. “Plaintiff Cannot Meet the Standard for a Motion for

Reconsideration” - Defendant lost her right to make counter
argument long ago. Plaintiff doesn’t need to meet the standard as
Defendant failed to oppose in time. The motion should be deemed
consented to and granted in full.

1 **b. “Plaintiff Has Still Not Met And Conferred Pursuant To Local**
2 **Rule 37- 1 Regarding Rokoko’s Discovery Responses”** – This is

3
4 one of the most blatant lies Defense has made to date:

5 i. October 20, 2025 – Defense sent 90 pages of boilerplate
6 denials:

7
8 1. **RFA’s**: Defense stated they don’t know 250 words
9 which are regular English and opposed to all. (Dkt #80-
10 2), see also (Dkt #84).

11
12 2. **RFP’s**: Defense stated they will not produce a single
13 document and opposed to all. (Dkt #80-2)

14
15 3. **ROG’s**: Defense stated they will not answer a single
16 interrogatory and opposed to all (Dkt #80-2)

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18 ii. September 29, 2025 – Defense cancelled the 26(f) because they
19 couldn’t turn it into a recorded deposition of Plaintiff.

20
21 iii. September 29, 2025 – Defense stated “*we will not proceed with*
22 *any further calls*”

23
24 c. It is not Plaintiff’s job to hound, chase and beg a Defendant to meet
25 and confer after they have openly stated in writing they will not
26 participate further. Meet and confer requires “reasonable” and “good
27 faith attempts”. There is nothing reasonable about chasing a
28

1 Defendant to meet after flat out tell you in writing they will not meet
2 with you any further. Faith requires a non-self object or person;
3 therefore Good Faith isn't possible where there is no one on the other
4 side in which faith can be instilled whatsoever. She said no. The only
5 option was to compel:
6

- 7
- 8 i. October 10, 2025 – Plaintiff waited the ten-day requirement
9 under 37-1 and then filed a Motion to Compel; as Defense
10 failed to meet and confer within 10 days of Plaintiff's request.
11
 - 12 ii. This motion contained the L.R. 37-2.4 exception which allowed
13 it to be filed.
14

15 d. Next, for the blatant lie Defense presented, we did meet and confer on
16 October 30, 2025; as a Courtesy to them for missing the 26(f)
17 deadline. That discussion encompassed discovery to which Defense
18 stated they required a protective order to comply; and simultaneously
19 that they will not produce anything. (Dkt #86)
20
21

22 **2. "This Court Has Discretion to Consider this Opposition"**

- 23
- 24 a. The Court always has discretion, however, The Court has also warned
25 Defendant many times that their defective filings will be stricken and
26 they will be sanctioned if they continue to do so (Dkt #39); and any
27
28

1 more of their filings will not be considered should they violate Local
2 Rules (Dkt #71)

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4 b. The Court also has discretion to sanction Defendant and Counsel for
5 their continued perversions of justice and contempt for the rules and
6 laws of this Court and discretion to Default Defendant for their
7 misconduct. Plaintiff counter-argues that this would be a much more
8 equitable use of the Court's inherent powers.
9

10
11 **3. "Plaintiff's Motion Mischaracterizes the Record"**

12 a. No. It doesn't. Which is why Defendant and their Counsel never has
13 counter-evidence, and never directly admits or denies anything, in any
14 filing – and especially not in the RFA's they refused to answer.
15

16 b. What the record really shows is:

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18 i. **Hardworking Plaintiff trying to move the case forward:**

- 19 1. Initiation of 7 venues for resolution/settlement.
- 20 2. Motion to Strike due to Defendants blatant lies before the
21 Court on jurisdiction.
- 22 3. Partial Withdrawl to stay in Federal under Federal
23 Question (Dkt #72)
- 24 4. First to propound discovery September 10, 2025
- 25 5. First to issue third-party subpoenas September 12, 2025
26
27
28

- 1 6. Motion for Sanctions to get the case on track (Dkt #73)
- 2
- 3 7. Authoring of the joint report on September 27 before the
- 4 26(f) conference on September 30.
- 5
- 6 8. RJN's to notify the Court of Defendants AI use (Dkt #77)
- 7
- 8 9. Motion to Compel a stonewalling Defendant who also
- 9 interfered with third-party subpoenas (Dkt #80)
- 10
- 11 10. Declaration of Defendant's ongoing AI use (Dkt #80-4)
- 12
- 13 11. RJN's to notify the Court of Defendants further
- 14 continued use of AI caselaw (Dkt #84)
- 15
- 16 12. Begging Defendant to participate in the 26(f) conference
- 17 before the deadline (Dkt #85-1)
- 18
- 19 13. Filing a Motion for Reconsideration to ask the Court to
- 20 Compel Defendants once Defendant fails to appear by
- 21 the 26(f) conference deadline (Dkt #85) to get discovery
- 22 moving again.
- 23
- 24 14. Engaging in a 26(f) as a Courtesy to Defendant *after* they
- 25 defaulted on the conference deadline. (Dkt #86)
- 26
- 27 15. Notice of Non-Opposition to that Motion to get discovery
- 28 moving again (Dkt #87)

1 16.Motion for Entry of Default to proceed on the merits
2 away from Defendants misconduct (Dkt #89)
3

4 17.Plaintiff filing his half of the joint report (Dkt #90)
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6
7 ii. **Stonewalling Defendant Doing Everything To Derail The**
8 **Case**

9 1. A June 15, 2025 Motion for Enlargement of Time (Dkt
10 #9) despite having the Complaint since about March
11 2025.
12

13 2. A Motion to Dismiss filed without L.R. 7-3 (Dkt #23)
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15 3. Refiled Motion to Dismiss, again filed without L.R. 7-3
16 (Dkt #42) as the Court gave a one week extension.
17

18 4. Objections to every one of Plaintiff's motions without
19 any counter evidence whatsoever.
20

21 5. 90-pages of boilerplate denials and refusal to answer
22 RFA's, RFP's and ROG's. (Dkt #80-2)
23

24 6. Cancellation of the 26(f) the day before and a statement
25 that they will no longer meet and confer (Dkt #80)
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27 7. Ex-parte interference with Plaintiff's subpoenas, getting
28 all to not produce (Dkt #80-3)

1 8. Failure to appear at the 26(f) conference by the deadline
2 on October 27, 2025

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4 9. Plaintiff files a motion to Compel, so they file a motion
5 to quash (Dkt #81)

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7 10. Failure to collaborate and file a timely joint report (Dkt
8 #89)

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10 iii. In summary, Mrs. Ellena is either willfully ignorant or just
11 terribly, terribly wrong. The record shows:

12 1. The Plaintiff doing everything imaginable to drive the
13 case forward towards a merits-based resolution

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15 2. The Defendant pulling the emergency brake, grabbing
16 the keys, jumping out the window, and running down the
17 street in the opposite direction as fast as possible to ever
18 allow discovery or the merits to be reached.
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22 Executed this 4th day of November, 2025, in Santa Clarita, California.

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26 Matthew R. Walsh
27 Plaintiff In Pro Per
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