

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  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 MATTHEW R. WALSH  
10 Plaintiff In Pro Per,

11 vs.

12  
13 ROKOKO ELECTRONICS  
14 (AND DOES 1 THROUGH 50,  
15 INCLUSIVE)

16 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

**NOTICE OF ERRATA OF  
PLAINTIFFS DECLARATION re:  
REBUTTALS TO DEFENDANTS  
UNTIMELY OPPOSITION**

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20 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD,**

21 **PLEASE TAKE NOTICE** that Plaintiff respectfully submits this Notice of Errata  
22 regarding the Plaintiff's Declaration re: REBUTTALS TO DEFENDANTS  
23 UNTIMELY OPPOSITION, (Docket #93-1), filed on November 10, 2025.  
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1 Due to Defendant's untimely opposition 14-days out from the hearing, entirely  
2 affecting Plaintiff's reply window and forcing a hurried reply: The Plaintiff filed a  
3 document which lacked the standard verification language required under 28  
4 U.S.C. § 1746.  
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8 The corrected filing is provided herein as EXHIBIT A, titled: "Declaration re:  
9 REBUTTALS TO DEFENDANTS UNTIMELY OPPOSITION"  
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12 **SUMMARY OF CHANGES**

- 13  
14 1. Added required declaratory header text  
15 2. Added required declaratory footer text  
16 3. No substantive arguments or changes to the body have occurred.  
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19 Executed this 10th day of November, 2025, in Santa Clarita, California.  
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24 Matthew R. Walsh  
25 Plaintiff In Pro Per  
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**EXHIBIT A**

MATTHEW R. WALSH  
19197 GOLDEN VALLEY RD #333  
SANTA CLARITA, CA 91387  
(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  
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**DECLARATION OF MATTHEW R.  
WALSH re: REBUTTALS TO  
DEFENDANTS UNTIMELY  
OPPOSITION**

I, Matthew R. Walsh, declare I am the Plaintiff in this matter. I have personal knowledge of the following facts and if called as a witness I could and would testify competently hereto:

**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

1 argument long ago. Plaintiff doesn't need to meet the standard as  
2 Defendant failed to oppose in time. The motion should be deemed  
3 consented to and granted in full.  
4

5 **b. "Plaintiff Has Still Not Met And Conferred Pursuant To Local**  
6 **Rule 37- 1 Regarding Rokoko's Discovery Responses"** – This is  
7 one of the most blatant lies Defense has made to date:  
8

9 i. October 20, 2025 – Defense sent 90 pages of boilerplate  
10 denials:  
11

12 1. **RFA's:** Defense stated they don't know 250 words  
13 which are regular English and opposed to all. (Dkt #80-  
14 2), see also (Dkt #84).  
15

16 2. **RFP's:** Defense stated they will not produce a single  
17 document and opposed to all. (Dkt #80-2)  
18

19 3. **ROG's:** Defense stated they will not answer a single  
20 interrogatory and opposed to all (Dkt #80-2)  
21

22 ii. September 29, 2025 – Defense cancelled the 26(f) because they  
23 couldn't turn it into a recorded deposition of Plaintiff.  
24

25 iii. September 29, 2025 – Defense stated "*we will not proceed with*  
26 *any further calls*"  
27  
28

1 c. It is not Plaintiff’s job to hound, chase and beg a Defendant to meet  
2 and confer after they have openly stated in writing they will not  
3 participate further. Meet and confer requires “reasonable” and “good  
4 faith attempts”. There is nothing reasonable about chasing a  
5 Defendant to meet after flat out tell you in writing they will not meet  
6 with you any further. Faith requires a non-self object or person;  
7 therefore Good Faith isn’t possible where there is no one on the other  
8 side in which faith can be instilled whatsoever. She said no. The only  
9 option was to compel:  
10  
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12

- 13 i. October 10, 2025 – Plaintiff waited the ten-day requirement  
14 under 37-1 and then filed a Motion to Compel; as Defense  
15 failed to meet and confer within 10 days of Plaintiff’s request.  
16  
17 ii. This motion contained the L.R. 37-2.4 exception which allowed  
18 it to be filed.  
19

20  
21 d. Next, for the blatant lie Defense presented, we did meet and confer on  
22 October 30, 2025; as a Courtesy to them for missing the 26(f)  
23 deadline. That discussion encompassed discovery to which Defense  
24 stated they required a protective order to comply; and simultaneously  
25 that they will not produce anything. (Dkt #86)  
26  
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28 **2. “This Court Has Discretion to Consider this Opposition”**

- 1 a. The Court always has discretion, however, The Court has also warned  
2 Defendant many times that their defective filings will be stricken and  
3 they will be sanctioned if they continue to do so (Dkt #39); and any  
4 more of their filings will not be considered should they violate Local  
5 Rules (Dkt #71)  
6  
7  
8 b. The Court also has discretion to sanction Defendant and Counsel for  
9 their continued perversions of justice and contempt for the rules and  
10 laws of this Court and discretion to Default Defendant for their  
11 misconduct. Plaintiff counter-argues that this would be a much more  
12 equitable use of the Court’s inherent powers.  
13  
14

15 3. **“Plaintiff’s Motion Mischaracterizes the Record”**

- 16 a. No. It doesn’t. Which is why Defendant and their Counsel never has  
17 counter-evidence, and never directly admits or denies anything, in any  
18 filing – and especially not in the RFA’s they refused to answer.  
19  
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21 b. What the record really shows is:  
22 i. **Hardworking Plaintiff trying to move the case forward:**  
23 1. Initiation of 7 venues for resolution/settlement.  
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25 2. Motion to Strike due to Defendants blatant lies before the  
26 Court on jurisdiction.  
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3. Partial Withdrawl to stay in Federal under Federal Question (Dkt #72)
4. First to propound discovery September 10, 2025
5. First to issue third-party subpoenas September 12, 2025
6. Motion for Sanctions to get the case on track (Dkt #73)
7. Authoring of the joint report on September 27 before the 26(f) conference on September 30.
8. RJN's to notify the Court of Defendants AI use (Dkt #77)
9. Motion to Compel a stonewalling Defendant who also interfered with third-party subpoenas (Dkt #80)
10. Declaration of Defendant's ongoing AI use (Dkt #80-4)
11. RJN's to notify the Court of Defendants further continued use of AI caselaw (Dkt #84)
12. Begging Defendant to participate in the 26(f) conference before the deadline (Dkt #85-1)
13. Filing a Motion for Reconsideration to ask the Court to Compel Defendants once Defendant fails to appear by the 26(f) conference deadline (Dkt #85) to get discovery moving again.

1 14.Engaging in a 26(f) as a Courtesy to Defendant *after* they  
2 defaulted on the conference deadline. (Dkt #86)

3  
4 15.Notice of Non-Opposition to that Motion to get discovery  
5 moving again (Dkt #87)

6  
7 16.Motion for Entry of Default to proceed on the merits  
8 away from Defendants misconduct (Dkt #89)

9  
10 17.Plaintiff filing his half of the joint report (Dkt #90)

11  
12 ii. **Stonewalling Defendant Doing Everything To Derail The**  
13  
14 **Case**

15 1. A June 15, 2025 Motion for Enlargement of Time (Dkt  
16 #9) despite having the Complaint since about March  
17 2025.

18  
19 2. A Motion to Dismiss filed without L.R. 7-3 (Dkt #23)

20  
21 3. Refiled Motion to Dismiss, again filed without L.R. 7-3  
22 (Dkt #42) as the Court gave a one week extension.

23  
24 4. Objections to every one of Plaintiff's motions without  
25 any counter evidence whatsoever.

26  
27 5. 90-pages of boilerplate denials and refusal to answer  
28 RFA's, RFP's and ROG's. (Dkt #80-2)

- 1 6. Cancellation of the 26(f) the day before and a statement
- 2 that they will no longer meet and confer (Dkt #80)
- 3
- 4 7. Ex-parte interference with Plaintiff's subpoenas, getting
- 5 all to not produce (Dkt #80-3)
- 6
- 7 8. Failure to appear at the 26(f) conference by the deadline
- 8 on October 27, 2025
- 9
- 10 9. Plaintiff files a motion to Compel, so they file a motion
- 11 to quash (Dkt #81)
- 12
- 13 10. Failure to collaborate and file a timely joint report (Dkt
- 14 #89)

15 iii. In summary, Mrs. Ellena is either willfully ignorant or just

16 terribly, terribly wrong. The record shows:

- 17 1. The Plaintiff doing everything imaginable to drive the
- 18 case forward towards a merits-based resolution
- 19
- 20 2. The Defendant pulling the emergency brake, grabbing
- 21 the keys, jumping out the window, and running down the
- 22 street in the opposite direction as fast as possible to ever
- 23 allow discovery or the merits to be reached.
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1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct.  
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5 Executed this 10th day of November, 2025, in Santa Clarita, California.  
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9 Matthew R. Walsh  
10 Plaintiff In Pro Per  
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