

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]*

**NOTICE OF DEFENDANTS  
VEXATIOUS LITIGATION AND  
REQUEST FOR JUDICIAL  
INTERVENTION**

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9

10 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD,**  
11 **PLEASE TAKE NOTICE** that Plaintiff can no longer effectively prosecute his  
12 claims. He deems Defendant a vexatious litigant whose conduct has encumbered  
13 the procedures of this Court. In six months, there has been not a single motion that  
14 has been granted or denied and so there has been nothing to hold Defendant

15 accountable for the snowball effect of their misconduct which has now caused the  
16 case to grind to a halt. Plaintiff is simply stuck.

17

18 **PLAINTIFF IS THE ONLY RESPONSIBLE PARTY** Simply looking at the  
19 docket shows a Plaintiff doing everything to move the case forward (jurisdictional  
20 correction, striking noncompliant documents, responding diligently to motions,  
21 seeking sanctions for noncompliance and misconduct, first to propound discovery,  
22 first to issue third party subpoenas, notifications to the Court, moving to compel  
23 when Defendant halts, holding a 26(f) conference even when Defendant blows by  
24 the deadline). Fourteen causes of action, irrefutable forensic evidence, a finalized  
25 Motion for Summary judgment which is almost certain to succeed – There is no  
26 reality in which Plaintiff benefits from not meeting and conferring. Since being  
27 granted with ECF, Plaintiff’s filings have been entirely compliant and tight.

28

29 **DEFENDANT JUST ECHOS PLAINTIFFS ACCUSATIONS AFTER**

30 **CONFRONTATION** Defendant however, simply recites each accusation after

31 Plaintiff demonstrates they’ve done something wrong, with evidence: (“Defendant  
32 won’t meet and confer, here’s the proof” => “No, Plaintiff won’t meet and confer!

33 No counter proof to show we tried.”), (“Defendant is using AI fabricated caselaw

34 3x” => “Plaintiff should have to file a declaration of his AI use!”), (“Defendant

35 violated these local rules” => “Plaintiff’s claims are unfounded!”), (“Defendant  
36 made the following demonstrably false statements, here is the evidence” =>  
37 “Plaintiff just disagrees with what we said, no counter evidence”)

38

39 **DEFENDANT IS STONEMANING AND DELAYING** Defendant simply  
40 hasn’t filed a single compliant motion to date, violating Local Rules with every  
41 filing. They have missed every Court-ordered deadline, refuse to meet and confer,  
42 have submitted no counter evidence to a single accusation, have denied nothing  
43 (simply says ‘belied by the record’ and ‘unfounded’), have provided zero  
44 discovery, served only 90 pages of objections to all discovery, not a single  
45 admission answered, multiple instances of ex-parte interference causing all  
46 subpoenas to freeze with zero production, threatening civil and criminal action,  
47 harassing Plaintiff and further filing delay-centric motions for: more time, motions  
48 to dismiss, motions to quash and extremely late objections even after a motion was  
49 noticed as unopposed.

50

51 **DEFENDANT UNDERESTIMATED PLAINTIFF AND HAS BECOME**  
52 **VEXATIOUS** The reasoning is not difficult to discern. On it’s face, they expected  
53 a quick victory as the case appeared too large for a pro se to handle. Defendant’s  
54 hired the biggest law firm they Could who thought they would easily steamroll a

55 pro se within the first two weeks and have the case over, in fact, their client stated  
56 as much directly to Plaintiff prior. However, clearly this wasn't the reality  
57 Defendant's hoped for. From day one, Plaintiff called out their every misdeed  
58 before the Court. Defendants and Counsel have become angry, frustrated and  
59 utterly vexatious both by definition and as a matter of rule and law. The motion for  
60 sanctions contains evidence, to which Defendant provided no counter evidence,  
61 which demonstrates this to be true. Further, will offer the Court a full review of all  
62 his communications (e-mails, phone records) with ReedSmith and Defendants and  
63 phone records which will demonstrate that he is the only party trying to move  
64 forward.

65  
66 **PLAINTIFF DOES NOT WISH TO CREATE DOCKET NOISE** Plaintiff does  
67 not wish in any capacity to make noise, overfilling or drama before the Court nor  
68 to continue filing motions or documents which clog the docket and burden the  
69 Court. Should the Court intervene and evaluate the statements and the evidence in  
70 any of the following motions, Plaintiff believes the case can either get back on  
71 track, or Defendant's continuation in it would cease to exist.

72  
73 **PLAINTIFF OFFERS HIMSELF SANCTIONS OR JAIL IF HE HAS**  
74 **ENGAGED IN MISCONDUCT OR LIES** Instead of cussing through thousands

75 of pages to find the truth, Plaintiff reminds the Court that he has filed nearly  
76 everything under penalty of perjury, including this statement. If the Court can find  
77 any instance where Plaintiff has intentionally lied or misrepresented anything, he  
78 welcomes Sanctions or even jail-time. Defendant cannot and will not say the same.  
79 Defendants severely harmed Plaintiff and a project that means more to him than  
80 anything in the world, he just wants justice.

81  
82 In the interest of judicial economy, should the Court act on one or more of the  
83 below, Plaintiff will withdraw some of his pending motions and filings voluntarily  
84 to free Court resources ongoing.

85

86 **Plaintiff respectfully begs the Court for intervention:**

- 87 1. Offer judicial intervention as soon as possible.
- 88 2. Provide the Parties with a Case Management Conference or other hearing  
89 (even a pending motion hearing) to get the case back on track.
- 90 3. Consider staying the case until one or more of the following motions are  
91 ruled upon:
  - 92 a. Motion for Default. (Dkt #89)
  - 93 b. Motion for Sanctions (Dkt #80)
- 94 4. Grant Plaintiff's unopposed Motion for Reconsideration (Dkt #85)

95

96 I declare under penalty of perjury under the laws of the United States of America  
97 that the foregoing is true and correct.

98

99

Executed this 11th day of November, 2025, in Santa Clarita, California.

100



Matthew R. Walsh  
Plaintiff In Pro Per

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