

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  
19197 GOLDEN VALLEY RD #333  
SANTA CLARITA, CA 91387,

Plaintiff In Pro Per,

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50,  
INCLUSIVE)  
31416 AGOURA RD STE 118  
WESTLAKE VILLAGE, CA  
91361

Defendant

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

Before: Hon. Otis D. Wright II  
Courtroom 5D

**PLAINTIFF'S FIRST SET OF  
REQUESTS FOR ADMISSION TO  
DEFENDANT ROKOKO  
ELECTRONICS AND DOES 1-50**

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10 **PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION TO**

11 **DEFENDANT ROKOKO ELECTRONICS AND DOES 1-50**

12  
13 TO DEFENDANT ROKOKO ELECTRONICS ("DEFENDANT") AND THEIR  
14 ATTORNEYS OF RECORD:

15 **DEFINITIONS**

- 16 1. “Plaintiff” means Matthew R. Walsh.
- 17 2. “Defendant” means Rokoko Electronics, its officers, directors, employees,  
18 agents, and attorneys, including DOES 1–50.
- 19 3. “Document” shall have the meaning set forth in Fed. R. Civ. P. 34(a)(1)(A).  
20 “Identify” when referring to a person means to provide that person’s full  
21 name, last known address, telephone number, and present or last known  
22 place of employment.
- 23 4. If you lack knowledge or information, you must state that you have made a  
24 reasonable inquiry and that the information known or readily obtainable is  
25 insufficient to enable you to admit or deny.
- 26 5. These requests are continuing in nature, and you must serve supplemental  
27 responses if you later obtain additional responsive information.
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30 **INSTRUCTIONS**

31 **A.** Each matter of which admission is requested shall be separately admitted or  
32 denied. If a matter cannot be admitted or denied in full, the answering party shall  
33 specifically admit or deny such part as is true and qualify or deny the remainder, as  
34 required by Fed. R. Civ. P. 36(a)(4).

35 **B.** If the answering party cannot truthfully admit or deny a matter, the answer shall  
36 set forth in detail the reasons why. A denial shall fairly meet the substance of the  
37 requested admission.

38 **C.** If the answering party lacks knowledge or information sufficient to admit or  
39 deny, the answer shall so state and affirm that a reasonable inquiry has been made  
40 and that the information known or readily obtainable is insufficient to enable an  
41 admission or denial, as required by Fed. R. Civ. P. 36(a)(4).

42 **D.** When construing these Requests:

- 43 1. “And” and “or” shall be construed conjunctively or disjunctively as  
44 necessary to make the request inclusive rather than exclusive.
- 45 2. “Including” shall mean “without limitation.”
- 46 3. The singular shall include the plural, and the plural shall include the  
47 singular.
- 48 4. The past tense shall include the present tense, and the present tense shall  
49 include the past tense.

50 **E.** Each answer shall identify the individual(s) who assisted in preparing or  
51 supplying information for that answer.

52 **F.** These Requests are continuing in nature. If, after serving answers, Defendant  
53 obtains or becomes aware of further information that would modify, change, or

54 supplement a prior answer, Defendant must serve amended answers as required by  
55 Fed. R. Civ. P. 26(e).

56  
57 **REQUESTS FOR ADMISSIONS**

58  
59 **REQUEST FOR ADMISSION NO. 1.** Admit that the metadata provided by  
60 Plaintiff of the PDF documents filed by Defendants in this action reflects  
61 that the documents were last modified in the Eastern Time Zone.

62 **REQUEST FOR ADMISSION NO. 2.** Admit that attorney Emily Graue affixed the  
63 typed signature “/s/ Katherine J. Ellena” to one or more PDF filings in this  
64 action.

65 **REQUEST FOR ADMISSION NO. 3.** Admit that in Defendants’ filings concerning  
66 jurisdiction, Defendants did not disclose the property located at 44 Tehama  
67 Street, San Francisco, California.

68 **REQUEST FOR ADMISSION NO. 4.** Admit that Rokoko Care (“CoCo”) and  
69 Rokoko Electronics share common ownership.

70 **REQUEST FOR ADMISSION NO. 5.** Admit that Rokoko Care (“CoCo”) and  
71 Rokoko Electronics have held joint or overlapping board meetings.

72 **REQUEST FOR ADMISSION NO. 6.** Admit that Rokoko Care (“CoCo”) and  
73 Rokoko Electronics share assets.

74 **REQUEST FOR ADMISSION NO. 7.** Admit that Trifork has owned approximately  
75 22% of Rokoko Care (“CoCo”).

76 **REQUEST FOR ADMISSION NO. 8.** Admit that the office depicted in Plaintiff’s  
77 photographs was used by Defendants as a headquarters location.

78 **REQUEST FOR ADMISSION NO. 9.** Admit that Mikkel Overby’s declaration in  
79 this action falsely states it was executed in Copenhagen, Denmark.

80 **REQUEST FOR ADMISSION NO. 10.** Admit that Defendants represented in  
81 filings with this Court that Rokoko had no business ties to California.

82 **REQUEST FOR ADMISSION NO. 11.** Admit that Jakob Balslev is the CEO,  
83 CFO, and Secretary of Rokoko Electronics

84 **REQUEST FOR ADMISSION NO. 12.** Admit that attorneys from Reed Smith  
85 LLP assisted in drafting Mikkel Overby’s declaration in this action.

86 **REQUEST FOR ADMISSION NO. 13.** Admit that attorney Emily Graue  
87 assisted in drafting Katherine J. Ellena’s declaration in this action.

88 **REQUEST FOR ADMISSION NO. 14.** Admit you knew Plaintiff needed his  
89 motion capture equipment to operate in order to finish his video game.

90 **REQUEST FOR ADMISSION NO. 15.** Admit that investors who witnessed  
91 the 2022 pitch deck knew of the Company’s intentions to use “User  
92 Content” (including but not limited to Animation Data).

93 **REQUEST FOR ADMISSION NO. 16.** Admit that before March 2025, your  
94 terms of service never granted you the rights to use or resell user animations.

95 **REQUEST FOR ADMISSION NO. 17.** Admit that after March 2025, your  
96 terms of service were changed to grant you the right to “anonymize”  
97 animations and resell them to third parties.

98 **REQUEST FOR ADMISSION NO. 18.** Admit that you supply, offer and/or  
99 resell user animations for financial gain.

100 **REQUEST FOR ADMISSION NO. 19.** Admit that your third party recipients  
101 of the animations supply, offer and/or resell user animations for financial  
102 gain.

103 **REQUEST FOR ADMISSION NO. 20.** Admit that your animations contain  
104 CMI including but not limited to (authors name, unique serial numbers,  
105 other unique identifiers).

106 **REQUEST FOR ADMISSION NO. 21.** Admit that Plaintiff does not have an  
107 active ‘Teams’ subscription and has never purchased one.

108 **REQUEST FOR ADMISSION NO. 22.** Admit that even without a ‘Teams’  
109 subscription, you still collect User-Content animations.

110 **REQUEST FOR ADMISSION NO. 23.** Admit that before this lawsuit was  
111 filed, you considered or conducted AI training using user animations.

112 **REQUEST FOR ADMISSION NO. 24.** Admit you do not have a working,  
113 user-controlled opt-out mechanism for data collection.

114 **REQUEST FOR ADMISSION NO. 25.** Admit that your claim of having  
115 “teams” at offices worldwide was inaccurate.

116 **REQUEST FOR ADMISSION NO. 26.** Admit that your employee counts in  
117 marketing materials and websites overstated the number of employees.

118 **REQUEST FOR ADMISSION NO. 27.** Admit you receive live telemetry from  
119 customers including but not limited to sensor status, sensor firmware  
120 versions, if it is within an error state, the error type or message

121 **REQUEST FOR ADMISSION NO. 28.** Admit you received telemetry  
122 demonstrating Plaintiff’s sensors were in mixed boot states

123 **REQUEST FOR ADMISSION NO. 29.** Admit you made the following  
124 statement *“We will therefore offer to send you what you have listed below on*  
125 *the condition that this closes the case immediately.”* -- *“we are willing to go*  
126 *further and help you get quickly back to your projects”* -- *“That will allow*  
127 *both you and us to go back to work, which ultimately should be the goal.”*

128 **REQUEST FOR ADMISSION NO. 30.** Admit you refused to provide Plaintiff  
129 with parts from about September 2024 through about April 2025.

130 **REQUEST FOR ADMISSION NO. 31.** Admit you refused to repair or replace  
131 Plaintiff’s equipment from about September 2024 through about April 2025.

132 **REQUEST FOR ADMISSION NO. 32.** Admit that changes to your firmware  
133 caused Plaintiff's equipment to stop working.

134 **REQUEST FOR ADMISSION NO. 33.** Admit your motion capture suits  
135 cannot be used with any other operating software but your own.

136 **REQUEST FOR ADMISSION NO. 34.** Admit that you disclaim warranties.

137 **REQUEST FOR ADMISSION NO. 35.** Admit you have modified the terms of  
138 service *without* notification to customers.

139 **REQUEST FOR ADMISSION NO. 36.** Admit you stated to customers "*By*  
140 *continuing to use Rokoko products after march 22, 2025, you'll be agreeing*  
141 *to the updated terms*"

142 **REQUEST FOR ADMISSION NO. 37.** Admit "anonymizing" includes at a  
143 minimum to remove CMI

144 **REQUEST FOR ADMISSION NO. 38.** Admit one animation is generally five  
145 segments

146 **REQUEST FOR ADMISSION NO. 39.** Admit you collected Plaintiff's  
147 intellectual property ("animations")

148 **REQUEST FOR ADMISSION NO. 40.** Admit that you have more than one  
149 employee in California

150 **REQUEST FOR ADMISSION NO. 41.** Admit that Rokoko Studio contains a  
151 web server with a "SECRET AREA" default realm.

152 **REQUEST FOR ADMISSION NO. 42.** Admit that Rokoko Studio includes  
153 functionality that can remotely disable customer use of the software.

154 **REQUEST FOR ADMISSION NO. 43.** Admit Rokoko Studio can  
155 automatically mark that customers have consented to the EULA whether  
156 they actually did or not.

157 **REQUEST FOR ADMISSION NO. 44.** Admit that Rokoko Studio included  
158 undocumented functionality permitting remote access by Rokoko personnel.

159 **REQUEST FOR ADMISSION NO. 45.** Admit that Rokoko Studio has a time-  
160 based feature which forces a user to connect to the internet to use the  
161 software in order for their animations to be synchronized with your servers.

162 **REQUEST FOR ADMISSION NO. 46.** Admit your software uses MQTT  
163 keep-alive to perform NAT hole punching.

164 **REQUEST FOR ADMISSION NO. 47.** Admit some or all of your senior staff  
165 lives and works in or around Tranbjerg.

166 **REQUEST FOR ADMISSION NO. 48.** Admit some or all of your senior staff  
167 lives and works in or around Fyn.

168 **REQUEST FOR ADMISSION NO. 49.** Admit some or all of the user-  
169 animation data used in the making of Rokoko Care “CoCo” came from  
170 Rokoko user-content.

**REQUEST FOR ADMISSION NO. 50.**

Admit that your marketing materials

included inaccurate customer or user counts.

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Dated this September 11, 2025, in Santa Clarita, California.



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Matthew R. Walsh  
Plaintiff In Pro Per

180 **PROOF OF SERVICE**

181 I, Matthew R. Walsh, declare:

182  
183 I am a resident of the State of California, over the age of eighteen years, and a  
184 party to this action. My business address is 19197 Golden Valley Rd #333, Santa  
185 Clarita, CA 91387.

186  
187 On September 11, 2025, I served the following document(s):

188  
189 **PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION TO**  
190 **DEFENDANT ROKOKO ELECTRONICS AND DOES 1-50**

191  
192  by transmitting a true copy via electronic mail to the following email  
193 address(es):

194 **Reed Smith LLP (Counsel for Defendant)**  
195 Heather Valencia, Esq.  
196 [Hvalencia@reedsmith.com](mailto:Hvalencia@reedsmith.com)

197  
198  By placing a true and correct copy in a sealed envelope, with first-class postage  
199 fully prepaid, and depositing it in the United States Mail at Santa Clarita,  
200 California, addressed as follows:

201 **Reed Smith LLP (Counsel for Defendant)**  
202 Heather Valencia, Esq.  
203 515 South Flower Street, Suite 4300  
204 Los Angeles, CA 90071

205  
206 I declare under penalty of perjury under the laws of the United States of America  
207 that the foregoing is true and correct.

208  
209 Executed on September 11, 2025  
210 Santa Clarita, California

211 

212  
\_\_\_\_\_  
Matthew R. Walsh  
Plaintiff In Pro Per