

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 SECOND SET OF  
REQUESTS FOR ADMISSION TO  
DEFENDANT ROKOKO  
ELECTRONICS AND DOES 1-50**

8  
9  
10 **PLAINTIFF'S SECOND 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.
- 28

29

---

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 when Defendants represented to  
60 the Court that Plaintiff’s exhibits were “fabricated,” Defendants had not  
61 undertaken any effort to authenticate those exhibits, including but not  
62 limited to verifying metadata, reviewing audit logs, or consulting with any  
63 qualified expert.

64  
65 **REQUEST FOR ADMISSION NO. 2.** Admit that when you stated “The Complaint  
66 consists of fabricated and fanciful allegations” you did not undertake any  
67 effort to understand or authenticate the allegations with the aid of a  
68 technological expert.

69  
70 **REQUEST FOR ADMISSION NO. 3.** Admit that you only had one 7-3 conference  
71 on June 26, 2025, yet filed documents and motions with the Court anyways.

73 **REQUEST FOR ADMISSION NO. 4.** Admit that you filed your motion to dismiss  
74 hours after the 7-3 conference on June 26, 2025, while knowing seven days  
75 were required prior to doing so.

76  
77 **REQUEST FOR ADMISSION NO. 5.** Admit that when you stated to the  
78 Court “Plaintiff has not provided any evidence confirming that such a  
79 copyright exists” that was a false statement as Plaintiff’s objection (Dkt #57)  
80 clearly contained U.S. Copyright #14,954,598,732.

81  
82 **REQUEST FOR ADMISSION NO. 6.** Admit that when Defendants  
83 represented to the Court that “this lawsuit was filed by Matthew R. Walsh  
84 and is just the latest event in a long-standing harassment campaign against  
85 Defendant,” Defendants had never reported to Plaintiff, any law enforcement  
86 agency, or any regulatory authority that they believed Defendant was being  
87 “harassed” by Plaintiff.

88  
89 **REQUEST FOR ADMISSION NO. 7.** Admit that Defendant gave no prior  
90 notice to Plaintiff prior to June 12, 2025 that you were removing the case to  
91 Federal Court.

93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110

**REQUEST FOR ADMISSION NO. 8.** Admit that when Mikkel Overby stated “*The Denmark office is approximately 886.4 square meters with a 62 square meter basement*” that the square meter measurements were falsely portrayed.

**REQUEST FOR ADMISSION NO. 9.** Admit that Defendant or it’s subsidiaries has an interest in the Delaware LLC: Rokoko, LLC

**REQUEST FOR ADMISSION NO. 10.** Admit that the Copenhagen “HQ” is unstaffed generally.

**REQUEST FOR ADMISSION NO. 11.** Admit you have less than 30 employees.

**REQUEST FOR ADMISSION NO. 12.** Admit that Counsel knew pro hac vice applications were required to be filed *prior* to practicing law before this Court including but not limited to authoring and filing documents.

111 **REQUEST FOR ADMISSION NO. 13.** Admit that Emily Graue continued  
112 calling and e-mailing Plaintiff after the Court removed her from the docket.

113  
114 **REQUEST FOR ADMISSION NO. 14.** Admit that when Counsel stated “That  
115 additional attorneys have been included in signature blocks indicating that  
116 pro hac petitions were pending” this was a false statement as no application  
117 had been submitted prior to June 17, 2025.

118  
119 **REQUEST FOR ADMISSION NO. 15.** Admit that when Counsel “Contrary  
120 to Plaintiff’s contentions, a Reed Smith attorney licensed in California has  
121 filed each document in this action” that this statement avoids the question of  
122 authorship and signatory.

123  
124 **REQUEST FOR ADMISSION NO. 16.** Admit that Mikkel Overby’s  
125 declaration contains contradictions with his earlier declaration.

126  
127 **REQUEST FOR ADMISSION NO. 17.** Admit that Mikkel Overby’s  
128 declaration (Dkt #1) stated the “HQ” is “86.4 square meters” but then in a  
129 later declaration contradicted himself in Dkt #62 by stating it was “886.4

130 square meters”.

131  
132 **REQUEST FOR ADMISSION NO. 18.** Admit that the metadata Plaintiff  
133 extracted from the PDF files served upon him is accurate.

134  
135 **REQUEST FOR ADMISSION NO. 19.** If 18 is Denied, Admit that you did  
136 not enlist an expert technologist to assist you in your determination.

137  
138 **REQUEST FOR ADMISSION NO. 20.** Admit that you have more customers  
139 in California than Denmark.

140  
141 **REQUEST FOR ADMISSION NO. 21.** Admit many or all of your core  
142 operational servers are located in Los Angeles.

143  
144 **REQUEST FOR ADMISSION NO. 22.** Admit that Defendant did not disclose  
145 to the Danish government the existence of its continued operations in  
146 California after receiving multi-million-dollar funding or investments.

147  
148 **REQUEST FOR ADMISSION NO. 23.** Admit that Emily Graue authored or  
149 edited documents in this action while no pro hac vice status was granted to

150 her.

151  
152 **REQUEST FOR ADMISSION NO. 24.** Admit that when Counsel stated  
153 “[Plaintiff stated he] is going to oppose pretty much everything” that  
154 statement was false.

155  
156 **REQUEST FOR ADMISSION NO. 25.** Admit that Counsel threatened  
157 Plaintiff with penal codes and “all statutory and civil remedies” once he  
158 stated he transcribed the meet and confer on June 26, 2025.

159  
160 **REQUEST FOR ADMISSION NO. 26.** Admit that during the June 26, 2025  
161 Local Rule 7-3 conference, Counsel for Defendant raised their voices at  
162 Plaintiff, laughed or giggled at Plaintiff, and made disparaging or  
163 condescending comments about Plaintiff’s status, filings or actions as a pro  
164 se litigant.

165  
166 **REQUEST FOR ADMISSION NO. 27.** Admit that during the June 26, 2025  
167 Local Rule 7-3 conference, Counsel for Defendant made statements to  
168 Plaintiff intended to dissuade him from pursuing his Motion to Strike  
169 removal, including remarks suggesting Plaintiff lacked the ability or basis to

170 succeed.

171  
172 **REQUEST FOR ADMISSION NO. 28.** Admit your Motion to Dismiss does  
173 not contain exactly 6,999 words.

174  
175 **REQUEST FOR ADMISSION NO. 29.** Admit that Defendant's Motion to  
176 Dismiss did not include a memorandum of points and authorities, and  
177 therefore could not have contained exactly 6,999 words as represented to the  
178 Court.

179  
180 **REQUEST FOR ADMISSION NO. 30.** Admit that when you stated Plaintiff's  
181 allegations were "fanciful," "fabricated," or part of a "harassment  
182 campaign," those statements were rhetorical in nature and not supported by  
183 any factual investigation.

184  
185 **REQUEST FOR ADMISSION NO. 31.** Admit that Counsel Emily Graue,  
186 Katherine J. Ellena, Michael Galibois and Heather Valencia do not possess  
187 the technical capability to interpret or reproduce the forensic evidence  
188 Plaintiff has placed before this Court.

189        **REQUEST FOR ADMISSION NO. 32.**    Admit that Counsel Emily Graue,  
190        Katherine J. Ellena, Michael Galibois, and Heather Valencia do not possess  
191        the technical expertise to interpret advanced forensic and software evidence,  
192        including but not limited to programming languages (such as C#), database  
193        queries (SQL, GraphQL), networking protocols (HTTP/HTTPS,  
194        WebSocket), debugging tools (stack traces, hex editor dumps), software  
195        engineering methods (multi-threading, obfuscation, scalable databases,  
196        system design), or hardware concepts (microcontroller programming,  
197        gyroscopic or accelerometer-based tracking, and electrical engineering).

198  
199        **REQUEST FOR ADMISSION NO. 33.**    Admit that Counsel Emily Graue,  
200        Katherine J. Ellena, Michael Galibois, and Heather Valencia do not possess  
201        the technical expertise to conduct or analyze cybersecurity methods,  
202        including but not limited to man-in-the-middle (MITM) captures, packet  
203        sniffing, proxy redirection, metadata extraction, or multi-protocol  
204        communication analysis.

205  
206        **REQUEST FOR ADMISSION NO. 34.**    Admit that no attorney at Reed Smith  
207        has performed any cybersecurity analysis of Plaintiff's evidence in this case.  
208

209 **REQUEST FOR ADMISSION NO. 35.** Admit that Mikkel Overby's initial  
210 declaration contains a handwritten signature placed by him.

211  
212 **REQUEST FOR ADMISSION NO. 36.** Admit that Mikkel Overby's second  
213 declaration contains a DocuSign signature because it was drafted by  
214 ReedSmith and sent to him for signature.

215  
216 **REQUEST FOR ADMISSION NO. 37.** Admit Defendant has made false  
217 statements before this Court.

218  
219 **REQUEST FOR ADMISSION NO. 38.** Admit Defendant has withheld or  
220 omitted facts from this Court.

221  
222 **REQUEST FOR ADMISSION NO. 39.** Admit that Defendant has sold or  
223 licensed motion capture animation or motion data to Snap Inc. (commonly  
224 known as SnapChat).

225  
226 **REQUEST FOR ADMISSION NO. 40.** Admit that Defendant, or any person  
227 acting on Defendant's behalf, has made or caused to be made online  
228 statements or edits relating to Plaintiff or this case with the intent to limit or

229

discourage Plaintiff from speaking publicly about this case.

230

231

232

233

Dated this September 12, 2025, in Santa Clarita, California.

234

235

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is written over a horizontal line.

236

Matthew R. Walsh  
Plaintiff In Pro Per

237

238 **PROOF OF SERVICE**

239 I, Matthew R. Walsh, declare:

240  
241 I am a resident of the State of California, over the age of eighteen years, and a  
242 party to this action. My business address is 19197 Golden Valley Rd #333, Santa  
243 Clarita, CA 91387.

244  
245 On September 12, 2025, I served the following document(s):

246  
247 **PLAINTIFF'S SECOND SET OF REQUESTS FOR ADMISSION TO**  
248 **DEFENDANT ROKOKO ELECTRONICS AND DOES 1-50**

249  
250  by transmitting a true copy via electronic mail to the following email  
251 address(es):

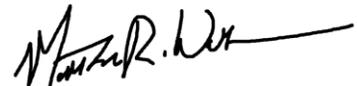
252 **Reed Smith LLP (Counsel for Defendant)**  
253 Heather Valencia, Esq.  
254 [Hvalencia@reedsmith.com](mailto:Hvalencia@reedsmith.com)

255  
256  By placing a true and correct copy in a sealed envelope, with first-class postage  
257 fully prepaid, and depositing it in the United States Mail at Santa Clarita,  
258 California, addressed as follows:

259 **Reed Smith LLP (Counsel for Defendant)**  
260 Heather Valencia, Esq.  
261 515 South Flower Street, Suite 4300  
262 Los Angeles, CA 90071

263  
264 I declare under penalty of perjury under the laws of the United States of America  
265 that the foregoing is true and correct.

266  
267 Executed on September 12, 2025  
268 Santa Clarita, California



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