

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 PRODUCTION  
FOR DEFENDANT ROKOKO  
ELECTRONICS AND DOES 1-50**

8  
9  
10 **PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION FOR**

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

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

15 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Matthew R.  
16 Walsh hereby requests that Defendant Rokoko Electronics produce the documents  
17 and electronically stored information (“ESI”) described below for inspection and  
18 copying within thirty (30) days of service hereof, in accordance with Rule 34(b).

---

20

21 **DEFINITIONS**

22 For purposes of these Interrogatories, the following definitions apply:

- 23 1. **“Defendant,” “You,” “Your,” or “Rokoko”** means Rokoko Electronics,  
24 Inc., Rokoko Care ApS (“CoCo”), their present and former officers,  
25 directors, employees, agents, representatives, attorneys, affiliates, parents,  
26 subsidiaries, and all other persons acting or purporting to act on their behalf.
- 27 2. **“CoCo”** means Rokoko Care ApS and any predecessor, successor, parent,  
28 subsidiary, affiliate, or related entity.
- 29 3. **“Plaintiff”** means Matthew R. Walsh.
- 30 4. **“Document”** means the broadest possible definition under Rule 34 of the  
31 Federal Rules of Civil Procedure, and includes all writings, communications,  
32 electronically stored information (“ESI”), data, charts, photographs,  
33 contracts, agreements, emails, messages, source code, metadata, drafts, and  
34 tangible things, whether final or in draft form.

- 35 5. **“Communication”** means any oral, written, or electronic exchange of  
36 information, including but not limited to meetings, phone calls, video  
37 conferences, emails, instant messages, text messages, Slack, Teams, or other  
38 collaboration tools.
- 39 6. **“User animation data”** means all animation files, derivative files,  
40 segmented files, metadata, logs, or related content generated, collected,  
41 transmitted, or stored by Rokoko products or services.
- 42 7. **“CMI”** means copyright management information as defined in 17 U.S.C. §  
43 1202(c), including but not limited to author names, titles, identifiers, serial  
44 numbers, hardware identifiers, and other information conveyed in  
45 connection with user animation data.
- 46 8. **“Anonymization”** means any process, method, or policy by which user  
47 animation data, metadata, or CMI is altered, removed, masked, or modified  
48 to obscure or remove identifying information.
- 49 9. **“Identify”** when used with reference to:
- 50 a. A **person**: provide the person’s full name, last known address,  
51 telephone number, email, employer, and relationship to Defendant;
- 52 b. A **document**: provide the title, date, author(s), recipient(s), type of  
53 document, and subject matter;

54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72

c. A **communication**: provide the date, participants, method of communication, and substance of the communication.

10. **“Relating to,” “concerning,” “regarding,” or “reflecting”** means in whole or in part, directly or indirectly mentioning, describing, discussing, constituting, evidencing, supporting, or contradicting the subject matter.

11. **“Time Period”** unless otherwise stated, means **January 1, 2020 to the present**.

12. **“Data structure”** means the technical organization of a data envelope, container or bucket. As some containers may contain other containers, the data requested is meant to be recursive. Data structure includes but is not limited to any schema, or format in which metadata, control data, protocol level data, communication protocol data, user animation data or related information is stored, including file headers, fields, metadata, logs, or structured containers or their subcontainers.

- a. Submitted data structures should be as original as possible.
- b. In the event of original data structures are not available, JSON or XML is preferred, the latter less so.

13. **“Telemetry” or “technical logs”** means any and all data automatically or manually generated, recorded, or transmitted by Rokoko hardware or

73 software for the purpose of monitoring, diagnosing, debugging, testing,  
74 updating, or operating the system. This includes, but is not limited to:

- 75 a. Diagnostic reports;
- 76 b. Informational logs;
- 77 c. Developer/debug logs;
- 78 d. Error logs, exception traces, and stack traces;
- 79 e. Firmware logs and update records;
- 80 f. Device identifiers, including but not limited to hardware IDs, MAC  
81 addresses, serial numbers, UUIDs, host names and IP addresses;
- 82 g. Authentication or handshake data insofar that it does not expose actual  
83 usernames, passwords, api keys, etc; but that it *does* contain any  
84 ‘realms’ or user levels.
- 85 h. Heartbeat, beacon or keep-alive messages (including MQTT, NAT or  
86 equivalent protocols);
- 87 i. System / component state indicators (boot states, sensor states,  
88 calibration data);
- 89 j. Performance metrics (latency, packet loss, throughput, memory or  
90 CPU usage);
- 91 k. Error logs especially fatal errors.
- 92 l. Crash reports and minidumps; and

- 93 m. Any other record or transmission reflecting the status, operation,  
94 configuration, or performance of Rokoko hardware or software.
- 95 n. Defendant shall not redact or omit technical fields except to protect  
96 authentication secrets (e.g., passwords, API keys). Logs shall be  
97 produced in complete form.

98 14. **“Blob animation data”** means the full content of animation data files.  
99 Unless otherwise specified, Plaintiff does not request the full blob content,  
100 but does request documents sufficient to show categories/type of data stored  
101 and at a minimum -- byte counts of that data.

102  
103 **INSTRUCTIONS**

- 104 1. **Time Period.** Unless otherwise specified, the relevant time period for these  
105 Requests is **January 1, 2020 to the present.**
- 106 2. **Scope of Production.** These Requests encompass all documents and  
107 electronically stored information (“ESI”) in Defendant’s possession,  
108 custody, or control, including those held by Defendant’s officers, directors,  
109 employees, agents, representatives, attorneys, contractors, and affiliates.
- 110 3. **Form of Production.**

111 a. **IMPORTANT:** All ESI, including emails, shall be produced in  
112 **native format with associated metadata intact.**

113 b. **IMPORTANT:** Emails must include the **full message header** (To,  
114 From, CC, BCC, Subject, Date/Time, full underlying technical data,  
115 communication data and routing information), the message body, and  
116 any attachments.

117 c. Screenshots, excerpts, or image-only versions are not sufficient unless  
118 accompanied by the corresponding native files.

119 d. Non-ESI documents shall be produced as legible, text-searchable PDF  
120 or TIFF images.

121 4. **Organization.** Documents shall be produced as they are kept in the usual  
122 course of business or shall be organized and labeled to correspond with the  
123 categories in these Requests.

124 5. **Privilege/Work Product.** If any document is withheld on the basis of  
125 privilege or work-product doctrine, provide a **privilege log** in compliance  
126 with Fed. R. Civ. P. 26(b)(5), identifying the date, author, recipients, general  
127 subject matter, and the specific privilege claimed.

128 6. **Partial Production.** If any Request cannot be fully answered, produce all  
129 responsive documents to the extent possible and state the reasons why a full  
130 response cannot be made.

131 7. **Continuing Duty.** These Requests are continuing in nature. Defendant must  
132 **seasonably supplement** its responses and production in accordance with  
133 Fed. R. Civ. P. 26(e).

134 8. **Construction.** The singular includes the plural and vice versa. The terms  
135 “and” and “or” shall be construed conjunctively and disjunctively as  
136 necessary to make the Request inclusive. The past tense includes the present  
137 tense and vice versa.

138 9. **Form and Organization of Production.** Documents shall be produced in  
139 electronic form unless otherwise agreed.

140 a. Each file shall be placed into a folder directory identifying the RFP  
141 and each file shall be named in a manner that identifies the Bates  
142 number range and, if available, a short descriptor (e.g.,  
143 “RFP\_3\_NaverZ\_contracts.pdf”)

144 c. If documents are produced in multiple batches, each batch shall  
145 include a cover letter or index identifying which Requests are  
146 addressed in that batch.

147 d. If documents are produced in native format (e.g., spreadsheets,  
148 emails), the file name shall clearly identify the originating Request  
149 number and be placed into the correct folder directory.

150 e. Emails shall be produced in native format (.msg or .eml) with  
151 attachments preserved and linked to the parent email.  
152  
153

154 **REQUESTS FOR PRODUCTION:**

155  
156 **REQUEST FOR PRODUCTION 1.** Produce all versions of Rokoko's Terms of  
157 Service from January 1, 2020 to the present.

158 **REQUEST FOR PRODUCTION 2.** Produce all internal communications, drafts,  
159 or notes concerning changes to Rokoko's Terms of Service from January 1,  
160 2020 to the present.

161 **REQUEST FOR PRODUCTION 3.** Produce all contracts, agreements, or  
162 memoranda of understanding between Rokoko and any third party  
163 concerning user animation data, anonymization, resale, licensing, or  
164 artificial intelligence/machine learning use, from January 1, 2020 to the  
165 present.

166 **REQUEST FOR PRODUCTION 4.** Produce all contracts, agreements, or  
167 communications between Rokoko and Naver-Z (Zepeto) from January 1,  
168 2020 to the present.

169 **REQUEST FOR PRODUCTION 5.** Produce all documents sufficient to show  
170 Rokoko’s definition, process, and policies concerning “anonymization” of  
171 user animation data.

172 **REQUEST FOR PRODUCTION 6.** Produce all technical specifications,  
173 schemas, or documentation describing the structure of user animation data  
174 files created in Rokoko Studio from January 1, 2020 to the present.

175 **REQUEST FOR PRODUCTION 7.** Produce all documents, communications, or  
176 data reflecting Rokoko’s collection or modification of copyright  
177 management information (“CMI”) in connection with user animation data.

178 **REQUEST FOR PRODUCTION 8.** Produce all documents or communications  
179 concerning Rokoko’s use of user animation data, with or without CMI, for  
180 artificial intelligence or machine learning purposes.

181 **REQUEST FOR PRODUCTION 9.** Produce all documents sufficient to show the  
182 categories of telemetry, logs, animation data or technical data collected by  
183 Rokoko Studio in connection with Plaintiff’s use of Rokoko’s products or  
184 services.

185 **REQUEST FOR PRODUCTION 10.** Produce all internal communications  
186 concerning Plaintiff’s requests to provide replacement parts, repairs or  
187 replacement from September 2024 through April 2025.

188 **REQUEST FOR PRODUCTION 11.** Produce all marketing materials, investor  
189 presentations, pitch decks, or websites that list Rokoko’s number of  
190 employees or “teams worldwide” from January 1, 2020 to the present.

191 **REQUEST FOR PRODUCTION 12.** Produce documents sufficient to show the  
192 number of Rokoko employees, board members, contractors in California and  
193 Delaware, respectively from January 1, 2020 to the present.

194 **REQUEST FOR PRODUCTION 13.** Produce all corporate governance  
195 documents, including shareholder registers, board minutes, or consents,  
196 reflecting Trifork’s ownership interest in Rokoko Electronics or Rokoko  
197 Care (“CoCo”).

198 **REQUEST FOR PRODUCTION 14.** Produce all **non-privileged documents**  
199 concerning the preparation, drafting, or execution of the declarations of  
200 Mikkel Overby or Katherine J. Ellena filed in this action, and provide a  
201 privilege log identifying any withheld documents.

202 **REQUEST FOR PRODUCTION 15.** Provide documents sufficient to show  
203 employee rosters and active employee counts for each year worldwide  
204 beginning in 2020 to present day.

205 **REQUEST FOR PRODUCTION 16.** Produce all organizational charts, corporate  
206 structures, or shareholder listings for Rokoko Electronics and Rokoko Care  
207 (“CoCo”) from January 1, 2020 to the present.

208 **REQUEST FOR PRODUCTION 17.** Produce all documents, contracts,  
209 communications, or marketing materials concerning Rokoko’s resale,  
210 licensing, or use of user animation data by third parties.

211 **REQUEST FOR PRODUCTION 18.** Produce all communications to users or  
212 potential users in which Rokoko stated, suggested, or implied that user  
213 animation data could be resold, licensed, anonymized, or used for AI/ML  
214 purposes.

215 **REQUEST FOR PRODUCTION 19.** Produce documents sufficient to show all  
216 categories of data, logs, or information maintained by Rokoko concerning  
217 Plaintiff, including but not limited to telemetry, project data, biometric data,  
218 copyright management information (“CMI”), and animation data. With  
219 respect to animation data, Plaintiff does not request the content of the files  
220 but does request documents sufficient to show the quantity (e.g., number of  
221 files or total byte size per file) stored.

222 **REQUEST FOR PRODUCTION 20.** Produce any and all investor pitch decks  
223 from 2020 to present.

224 **REQUEST FOR PRODUCTION 21.** Produce all communications, including  
225 emails and presentations, from January 1, 2020 to the present, concerning  
226 the intentions described in any Rokoko investor pitch decks to resell or

227

otherwise monetize user content or user animation data.

228

229

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

230

231

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

232

Matthew R. Walsh  
Plaintiff In Pro Per

233

234 **PROOF OF SERVICE**

235 I, Matthew R. Walsh, declare:

236  
237 I am a resident of the State of California, over the age of eighteen years, and a  
238 party to this action. My business address is 19197 Golden Valley Rd #333, Santa  
239 Clarita, CA 91387.

240  
241 On September 11, 2025, I served the following document(s):

242  
243 **PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION FOR**  
244 **DEFENDANT ROKOKO ELECTRONICS AND DOES 1-50**

245  
246  by transmitting a true copy via electronic mail to the following email  
247 address(es):

248 **Reed Smith LLP (Counsel for Defendant)**  
249 Heather Valencia, Esq.  
250 [Hvalencia@reedsmith.com](mailto:Hvalencia@reedsmith.com)

251  
252  By placing a true and correct copy in a sealed envelope, with first-class postage  
253 fully prepaid, and depositing it in the United States Mail at Santa Clarita,  
254 California, addressed as follows:

255 **Reed Smith LLP (Counsel for Defendant)**  
256 Heather Valencia, Esq.  
257 515 South Flower Street, Suite 4300  
258 Los Angeles, CA 90071

259  
260 I declare under penalty of perjury under the laws of the United States of America  
261 that the foregoing is true and correct.

262  
263 Executed on September 11, 2025  
264 Santa Clarita, California



265  
266 \_\_\_\_\_  
Matthew R. Walsh  
Plaintiff In Pro Per