

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

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10 **PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION FOR**

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

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

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

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

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

68 a. Submitted data structures should be as original as possible.

69 b. In the event of original data structures are not available, JSON or
70 XML is preferred, the latter less so.

71 13. **“Telemetry” or “technical logs”** means any and all data automatically or
72 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 deeds, leases, floor plans and
157 authenticated interior pictures sufficient to prove Rokoko's "HQ" is in fact
158 886.4 square meters and staffed daily.

159
160 **REQUEST FOR PRODUCTION 2.** Produce all deeds, leases, floor plans and
161 authenticated interior pictures for the basement unit.

162
163 **REQUEST FOR PRODUCTION 3.** Produce the most recent bank statement for
164 each of the following entities: Rokoko Electronics Inc., Rokoko LLC
165 (Delaware), Rokoko Care ApS, Rokoko Electronics ApS, CoCo Care ApS,
166 and any subsidiary, affiliate, or successor thereof. Each statement must
167 show, at minimum, the financial institution name, account type, account
168 number (last four digits), and current balance of every account held. This

169 request cannot be satisfied by an assertion that no such statement exists, as a
170 statement necessarily exists for any active account.

171
172 **REQUEST FOR PRODUCTION 4.** Produce all documents sufficient to identify
173 each attorney of record for Defendant who possesses technical expertise
174 enough to testify in any of the following subject areas: C# programming;
175 C/C++ programming; microcontroller development; multi-threading;
176 parallel development; man-in-the-middle (MITM) attacks; packet sniffing;
177 computer networking; metadata extraction; binary executable decompilation;
178 reverse engineering; systems architecture and design; Microsoft Intermediate
179 Language (MSIL); source code obfuscation or deobfuscation; and
180 knowledge of protocols including, but not limited to, HTTP, HTTPS,
181 WebSockets, TCP/IP, and UDP. Such documents shall include, without
182 limitation, resumes, curricula vitae, professional biographies, or other
183 materials sufficient to show the claimed expertise; if none – simply mark
184 “No experience”.

185
186 **REQUEST FOR PRODUCTION 5.** Produce all intercompany agreements, loans,
187 or transfers between Rokoko Electronics Inc., Rokoko LLC, Rokoko Care
188 ApS, and related entities, sufficient to show commingling of funds and alter

189 ego operation.

190
191 **REQUEST FOR PRODUCTION 6.** Produce all communications, drafts, or
192 postings made by Defendant, its employees, agents, or counsel concerning
193 Plaintiff or this litigation on Reddit, Discord, or any other online forum.

194
195 **REQUEST FOR PRODUCTION 7.** Produce all communications, support tickets,
196 or refund requests from 2020 to present concerning the following issues:
197 sensor failures, malfunctioning sensors, firmware issues, wiring issues, or
198 complete suit failures.

199
200 **REQUEST FOR PRODUCTION 8.** Produce all communications from
201 customers, vendors, or partners that reference Defendant's changes to its
202 Terms and Conditions in or about March 2025, including but not limited to
203 references to monetization of user intellectual property, collection of user
204 intellectual property, or resale of user intellectual property to third parties.

205
206 Dated this September 12, 2025, in Santa Clarita, California.

207

208

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is positioned above a horizontal line. The signature is fluid and cursive.

209

210

Matthew R. Walsh
Plaintiff In Pro Per

211 **PROOF OF SERVICE**

212 I, Matthew R. Walsh, declare:

213
214 I am a resident of the State of California, over the age of eighteen years, and a
215 party to this action. My business address is 19197 Golden Valley Rd #333, Santa
216 Clarita, CA 91387.

217
218 On September 12, 2025, I served the following document(s):

219
220 **PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION FOR**
221 **DEFENDANT ROKOKO ELECTRONICS AND DOES 1-50**

222
223 by transmitting a true copy via electronic mail to the following email
224 address(es):

225 **Reed Smith LLP (Counsel for Defendant)**
226 Heather Valencia, Esq.
227 Hvalencia@reedsmith.com

228
229 By placing a true and correct copy in a sealed envelope, with first-class postage
230 fully prepaid, and depositing it in the United States Mail at Santa Clarita,
231 California, addressed as follows:

232 **Reed Smith LLP (Counsel for Defendant)**
233 Heather Valencia, Esq.
234 515 South Flower Street, Suite 4300
235 Los Angeles, CA 90071

236
237 I declare under penalty of perjury under the laws of the United States of America
238 that the foregoing is true and correct.

239
240 Executed on September 12, 2025
241 Santa Clarita, California

242 

243

Matthew R. Walsh
Plaintiff In Pro Per