

3. Where information has been supplied by others or via alternative sources, the source of the information is identified. I believe such knowledge to be true to the best of my knowledge and belief.
4. I make this witness statement in response to the following application:
 - 4.1. the Second to Twelfth Defendants' ("**D2-D12**") application dated 2 October 2023 ("**the Application**") supported by the Fourth Witness Statement of Mr Timothy Elliss ("**Elliss4**") in which they seek:
 - 4.1.1. permission to be able to rely on Elliss4 in support of their application for a preliminary issue trial ("**D2-D12's Reliance Application**" and the "**D2-D12 PI Application**"); and
 - 4.1.2. an order that TTL provide D2-D12 with security for their costs up to the conclusion of the CMC on an urgent basis ("**D2-D12's Interim SFC Application**")
5. There is now produced and shown to me a bundle marked "**CSW6**" to which I shall refer in this statement. All references to page numbers are to pages in CSW6 unless otherwise stated.
6. For the avoidance of doubt, this witness statement is intended to deal solely with the D2-D12's Reliance Application and Elliss4. Whilst Elliss4 addresses and attempts to expedite the hearing for D2-D12's Interim SFC Application, the Court will be aware that this element of the Application has been resolved between the parties by way of a consent order **CSW6/Pages 1-2** and, as such, this statement shall not be addressing this part of Elliss4.

PROCEDURAL BACKGROUND TO THIS STATEMENT

7. On 2 October 2023, D2-D12 issued the Application and provided Elliss4 by way of supporting evidence for that application. This application was filed the day before the hearing on 3 October 2023 meaning that the Claimant did not have sufficient time to be able to consider the Application and Elliss4 in advance of the hearing.
8. Given this, TTL proposed the following:
 - 8.1. TTL would confirm to D2-D12 whether or not it consented to D2-D12's Reliance Application by 4pm on 11 October 2023.

- 8.2. If TTL consented, it would file its substantive response (if any) to Elliss4 by 4pm on 18 October 2023. If TTL objected, it would file its responsive evidence setting out the reasons for its objections by 4pm on 18 October 2023.
9. On 11 October 2023, D2-D12's legal representatives and the Claimant's former legal representatives agreed to further directions which were encompassed within a draft order **CSW6/Pages 3-4**. This order was emailed to Mr Justice Mellor's clerk on the same day **CSW6/Pages 5-6**. Broadly, these are:
 - 9.1. In the event the Claimant does not object to Elliss4, the Claimant's substantive response shall be filed and served on 18 October 2023;
 - 9.2. In the event the Claimant does object to Elliss4:
 - 9.2.1. The Claimant's evidence objecting to Elliss4 is to be filed and served by 18 October 2023;
 - 9.2.2. D2-12's evidence in reply shall be filed and served by 20 October 2023;
 - 9.2.3. The parties shall liaise with the Listing Office to schedule an urgent hearing of the Claimant's objection with a time estimate of half a day plus 90 minutes pre-reading, to be heard by a judge other than Mr Mellor J in the week commencing 23 October 2023.
 - 9.3. In the event the Claimant's objection to Elliss4 does not succeed:
 - 9.3.1. The Claimant's evidence in response to the substance (if any) is to be filed and served by 1 November 2023
 - 9.3.2. D2-12's reply evidence (if any) is to be filed and served by 7 November 2023
10. The Claimant does not object at this stage to the Elliss4 statement being admissible as evidence but does reserve the right to contend at the substantive hearing of the D2-D12 PI Application that the evidence in Elliss4 should not be admitted or should not be given any weight. The Claimant also challenges the veracity of a number of the matters referred to in the statement and responds as set out below.

SUMMARY

11. D2-D12's Reliance Application and the Elliss4 statement seeks to introduce evidence pertaining to collective statements Christen Ager-Hanssen, the former Group CEO of the nChain Group has made on X (formerly Twitter) recently. It is my understanding that Mr Ager-Hanssen was summarily dismissed as CEO from nChain **CSW6/Pages 7-9**.
12. D2-D12 seeks permission to rely on the evidence in the Elliss4 statement in support of their application for a preliminary issue at trial¹.
13. For clarity, the D2-D12 PI Application suggest that there should be three preliminary issue questions: (1) whether the Claimant owns the Bitcoin in the Addresses (as defined in paragraph 29 of the Amended Particulars of Claim); (2) whether the Claim has been brought by the Claimant knowing that it does not own the Bitcoin in the Addresses and (3) whether the Claim is advanced fraudulently by TTL such that it is an abuse of process **CSW6/Pages 10-15**.
14. It is the Claimant's position that D2-D12's Reliance Application and the Elliss4 statement are not relevant to the issues on the D2-D12 PI Application. Mr Ager-Hassen's tweets are simply a tirade on my character and largely bear little resemblance to the truth.

MR AGER-HANSEN'S TWEETS

15. Elliss4 refers to various tweets made by Mr Ager-Hanssen upon which D2-D12 wish to rely on. It should be noted by the Court that, as a whole, the Claimant considers the tweets made by Mr Ager-Hanssen to either lack relevance and/or evidence to support the Preliminary Issue Application. Moreover, in some instances, Mr Ager-Hanssen clearly refers to privileged information and documents.
16. Whilst the Claimant does not consider it necessary to respond to each tweet, there are some significant observations that can be made regarding most of them, as follows:
 - 16.1. Mr Ager-Hanssen's statement on 29 September 2023 timed at 11:18PM states that he had departed from nChain "*...after reporting several serious issues to the board of nChain Group including what **I believe** is a conspiracy to defraud nChain*" [emphasis added]. In the same statement, he states "*I*

¹ Elliss4 / Para 6.1

have also reported that I have found compelling evidence that Dr Craig Wright has manipulated documents with the aim to deceive the court he is Satoshi.". I am not a member of the nChain Board and am only associated with nChain as an external consultant; therefore, I cannot comment on what was raised with the Board directly. However, objectively these statements are merely Mr Ager-Hanssen's opinion, which he admits in the following sentence, *"I'm today myself convinced that Dr Craig Wright is NOT Satoshi and I'm persuaded he will lose all his legal battles"*. Despite him being convinced and persuaded that I am not Satoshi and that I will lose my legal battles, Mr Ager-Hanssen has not supported that position in the statement and Elliss4 by any form of evidence.

- 16.2. Mr Ager-Hanssen's tweet on 30 September 2023 timed at 12:01PM states *"...I had compelling evidence that @Dr_CS Wright is not Satoshi"*. Again, this is pure speculation and opinion by Mr Ager-Hanssen. There is no evidence within the tweet or within Elliss4 that supports this statement. If he had such evidence, it is surprising that he has not chosen to deploy it particularly after his summary dismissal.
- 16.3. On 30 September 2023 timed at 2:57PM, Mr Ager-Hanssen tweeted an alleged extract from a nChain Group Management meeting on 26 September² along with making statements threatening to release a supposed Whistleblowing Report drafted by Mr Ager-Hanssen³. As I am not a member of the nChain Board I cannot comment on the authenticity of the alleged Board minutes found within the tweet. However, I am aware, from information provided to me by Stefan Matthews, that a Whistleblowing Report was put before the Board when a meeting was called to discuss Mr Ager-Hanssen's position. I have also seen a copy of the report and can confirm there is no accurate information of any value within it. Whilst I cannot comment on the authenticity of the alleged Board minutes, it appears to me that both the alleged minutes and the Whistleblowing Report, if accurately described, would be both confidential company documents. Furthermore, and in any event, the documents are drafted by Mr Ager-Hanssen and promote his own position. Again, it should be noted that no evidence has been produced to verify the validity of the documents or their findings.

² TWE4 / page 26

³ TWE4 / page 34/35

16.4. On 30 September 2023 timed at 3:30PM, Mr Ager-Hanssen tweeted “*Part of a report #faketoshi*”. This extract of an apparent report has no details as to who it was made by, nor any evidence within the 1-page extract to support any of the allegations made within that extract against me. In short, it makes a raft of accusations, which I will respond as follows:

16.4.1. Points 13 and 14 at the top of the page do not reveal what documents I allegedly “deliberately backdated” or what I was “clearly lying” about so it is difficult for me to respond. However, Elliss4 indicates that these relate to an analysis of a hard drive. It is apparent that this is a veiled attempt to raise questions about the authenticity of documents found on the drive, in order to not allow them into evidence. I can confirm that no documents that the Claimant relies upon are fabricated or deliberately backdated.

16.4.2. It further claims that I purportedly accessed an online Q&A to ask what software Satoshi Nakamoto used to prepare the Bitcoin White Paper. I can confirm that I did access the website in question as part of my research in order to respond to authenticity reports from other proceedings. The page in issue relates to a question from seven and a half years ago. It was not me who asked the question but rather another individual. I accessed the site because it references a number of academic papers that have analysed the Bitcoin White Paper. One of these is related to an Aston University paper that did an analysis of my original White Paper in 2014. This analysis demonstrated that the bitcoin White Paper was written in LaTeX.

16.5. On 30 September 2023 timed at 9:27PM, Mr Ager-Hanssen tweeted allegations that I had forged documents by stating, “*The evidence I have seen makes me convinced that @Dr_CS Wright is a great “reproduction painter” this means **he has the ability to copy** of another work of art and in this case Satoshi by carefully studying/analysing him. There is no creative process involved and what ever @Dr_CS Wright created it is **in my opinion** often other people’s creation*” (emphasis added). Mr Ager-Hanssen provides no evidence to substantiate such a claim and even admits it is in his own opinion.

16.6. In paragraphs 14 and 15 of Elliss4 reference is made to a tweet by Mr Ager-Hanssen regarding an alleged email from Calvin Ayre to me on 30 September 2023 timed at 12:23PM (“**the Ayre Email**”). These paragraphs

ask the Court to read “the email in full”, but in fact Mr Ager-Hanssen does not provide the alleged email itself, but rather certain text which was said to have been included in the actual email. To my knowledge the email is not authentic and does not exist. It refers to “facts” that are not true, such as Calvin is funding the litigation. This isn’t true. Therefore, at best, it is nothing but a further opinion (in this case third hand), which is entirely irrelevant to the Preliminary Issue Application as to whether TTL owns the Bitcoin in question, not least because, if anything, it would support the Claimant’s case as it proceeds on the basis that the Claimant owns the Bitcoin in the Addresses.

- 16.7. Paragraph 16 of Elliss4 raises further unevidenced and unjustified allegations by Mr Ager-Hanssen. In this paragraph either I or Mr Ayre (it is not clear whom) am alleged to be “*perfectly willing to unlawfully pressure Lynn (my ex-wife)*”. The full wording is as Mr Elliss admits cut off and the statements are not only unevidenced but also cannot be properly interrogated.
- 16.8. Paragraph 17 of Elliss4 simply quotes Mr Ager-Hanssen’s opinion on live video stream platform “Spaces” alleging, amongst other things, that “*I’ve seen manipulated documents*”. Again, there is no evidence of these alleged manipulated documents. The authenticity of the extracts of transcripts that have been provided as evidence to support Mr Ager-Hanssen’s statements remains unclear from the documents provided within the exhibit. It is noted that the original video stream has also not been provided as an exhibit. Nonetheless, the extracts are simply Mr Ager-Hanssen’s opinion after he was summarily dismissed from nChain.
- 16.9. In respect of paragraph 19 of Elliss4, my paragraph 16.8 above is largely repeated given the similarity in the evidence put forward. These are further ramblings of an individual that had recently been summarily dismissed by nChain. They are opinions based on his own personal experiences with me. He states “*It’s obvious that he has created his own documents. And we can prove that*”. There is no evidence provided to support this assertion.

STATEMENT BY MR AYRE

17. Paragraphs 22-24 of Elliss4 provide numerous examples of tweets by Mr Ayre in response to the tweets of Mr Ager-Hanssen. The relevance of these tweets and the Enyo Defendant’s position in respect of these tweets is not clear. However, they

support the Claimant's position. The Claimant disputes the authenticity of the Ayre Email as is clear from the above.

RELEVANCE TO THESE PROCEEDINGS AND THE PRELIMINARY ISSUE AT TRIAL

18. I believe that Elliss4 is irrelevant in its entirety. Elliss4 contends at paragraph 25.1 that the statements made by Mr Ager-Hanssen are "*indicating evidence of document forgery and manipulation*". As can be seen from the paragraphs above, every statement that has been made by Mr Ager-Hanssen is either unsupported by any actual evidence, is mere opinion, or both. His statements are contradicted by Mr Ayre's tweets.
19. Nonetheless, D2-D12 state at the outset of Elliss4 that this evidence is to support their Preliminary Issue Application being "*an order...that (i) be a preliminary issue trial on the question of whether TTL owns the Bitcoin in the Addresses (as defined in paragraph 29 of the Amended Particulars of Claim)*". Elliss4 does not support or provide any evidence whatsoever that assists the Court in determining whether TTL owns the Bitcoin in the Addresses – Elliss4 is a series of statements made by Mr Ager-Hanssen attempting to damage my character, and the character of others.
20. Elliss4 refers to the "*hard drive with further evidence (and the apparent evidence of forgery and manipulation on that hard drive)*"⁴. However, the evidence to support this statement is the report referred to at paragraph 16.3 of this statement, which is therefore not reliable evidence. Mr Elliss alleges that I have not made full and frank disclosure in entirely separate proceedings. This point is irrelevant to the current proceedings.
21. The Ayre Email is misleading in that it is a text within a tweet – not an email. For D2-D12 to heavily rely on this as evidence that this "*support the Enyo Defendants contention that TTL never owned the Digital Assets...and has brought this claim on a knowingly false basis*"⁵ is highly speculative.

CONCLUSION

22. Elliss4 provides no tangible evidence that supports the Preliminary Issue Application. Simply, D2-D12 are making serious allegations of fraud, manipulation and forgery

⁴ Elliss4 / para 25.2

⁵ Elliss4 / para 25.3

without providing any proper evidence establishing those allegations or any documents to support that position.

23. It appears that the dominant purpose of Elliss4 was to attempt to expedite D2-D12's Interim SFC Application for security for costs. Given that this part of the Application has been resolved between the parties, the Elliss4 statement is even more irrelevant to current proceedings.

Statement of Truth:

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: Craig S Wright

Name: **DR CRAIG STEVEN WRIGHT**

Position: CEO of Tulip Trading Limited (a Seychelles Company)

Dated: 18 October 2023

IN THE HIGH COURT OF JUSTICE

CLAIM NO. BL-2021-000313

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS LIST (CHD)

BETWEEN:

TULIP TRADING LIMITED (A SEYCHELLES COMPANY)

Claimant

and

1. BITCOIN ASSOCIATION FOR BSV (A SWISS VEREIN)

2. VLADMIR VAN DEN LAAN

3. JONAS SCHNELLI

4. PIETER WUILLE

5. MARCO FALKE

6. SAMUEL DOBSON

7. MICHAEL FORD

8. CORY FIELDS

9. GEORGE DOMBROWSKI

10. MATTHEW CORALLO

11. PETER TODD

12. GREGORY MAXWELL

13. ERIC LOMBROZO

14. ROGER VER

15. AMAURY SECHET

16. JASON COX

Defendants

EXHIBIT CSW6

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
BUSINESS LIST (ChD)

MR JUSTICE MELLOR
13th OCTOBER 2023



BL-2021-000313

BETWEEN:

TULIP TRADING LIMITED

Claimant

and

- (1) BITCOIN ASSOCIATION FOR BSV**
- (2) WLADIMIR VAN DER LAAN**
- (3) JONAS SCHNELLI**
- (4) PIETER WUILLE**
- (5) MARCO FALKE**
- (6) SAMUEL DOBSON**
- (7) MICHAEL FORD**
- (8) CORY FIELDS**
- (9) GEORGE DOMBROWSKI**
- (10) MATTHEW CORALLO**
- (11) PETER TODD**
- (12) GREGORY MAXWELL**
- (13) ERIC LOMBROZO**
- (14) ROGER VER**
- (15) AMAURY SÉCHET**
- (16) JASON COX**

Defendants

CONSENT ORDER

UPON the application of the Second to the Twelfth Defendants (‘the **Enyo Defendants**’) by notice dated 11 July 2023 (‘**Enyo Defendants’ Security Application**’)

AND UPON the application of the Fifteenth and Sixteenth Defendants by notice dated 14 July 2023 (**‘D15 and D16’s Security Application’**)

AND UPON the application of the Enyo Defendants by notice dated 2 October 2023 (**‘Enyo Defendants’ Expedition Application’**)

AND UPON the first Case Management Conference in these proceedings being listed before Mr Justice Mellor for 3 days in a window between 13 and 17 November 2023 (the **“First CMC”**)

IT IS ORDERED BY CONSENT THAT:

1. The Claimant shall by 4:30pm on 18 October 2023 pay into the Senior Courts Costs Office the sums of:
 - (1) **£296,154.95** by way of an interim payment of security for the Enyo Defendants’ incurred and estimated costs of proceedings.
 - (2) **£192,417.75** by way of an interim payment of security for D15 and D16’s costs incurred and estimated costs of proceedings.
2. The costs of the Enyo Defendants’ Security Application, save in respect of issues of quantum, shall be costs in the case.
3. Subject to paragraph 2 above, the Enyo Defendants’ Security Application and D15 and D16’s Security Application, including the costs thereof, stand to be determined at the First CMC.
4. Costs reserved to the First CMC.
5. Liberty to apply.

Service of the Order

This Order shall be served by the Enyo Defendants, via their solicitors Enyo Law LLP, on all other Parties.

The Court has provided a sealed copy of this order to the Serving party:

Enyo Law LLP, 1 Tudor Street, London, EC4Y 0AH

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
BUSINESS LIST (ChD)

BEFORE:

DATED:

BETWEEN:

(1) TULIP TRADING LIMITED (a Seychelles company)

CLAIMANT

- and -

(1) BITCOIN ASSOCIATION FOR BSV (a Swiss verein)

(2) VLADIMIR VAN DER LAAN

(3) JONAS SCHNELLI

(4) PIETER WUILLE

(5) MARCO FALKE

(6) SAMUEL DOBSON

(7) MICHAEL FORD

(8) CORY FIELDS

(9) GEORGE DOMBROWSKI

(10) MATTHEW CORALLO

(11) PETER TODD

(12) GREGORY MAXWELL

(13) ERIC LOMBROZO

(14) ROGER VER

(15) AMAURY SÉCHET

(16) JASON COX

DEFENDANTS

Draft ORDER

UPON the service of the Fourth Witness Statement of Timothy William Elliss dated 1 October 2023 (“Elliss 4”);

IT IS ORDERED THAT:

1. In the event the Claimant does not object to Elliss 4, the Claimant’s substantive response shall be filed and served on 18 October 2023;

2. In the event the Claimant does object to Elliss 4:
 - a. The Claimant's evidence in response to Elliss 4 is to be filed and served by 16 October 2023;
 - b. D2-12's evidence in reply shall be filed and served by 20 October 2023;
 - c. The parties shall liaise with the Listing Office to schedule an urgent hearing of the Claimant's objection with a time estimate of half a day plus 90 minutes pre-reading, to be heard by a judge other than Mr Mellor J in the week commencing 23 October 2023.

3. In the event the Claimant's objection to Elliss 4 does not succeed:
 - a. The Claimant's evidence in response to the substance (if any) is to be filed and served by 1 November 2023
 - b. D2-12's reply evidence (if any) is to be filed and served by 7 November 2023

4. No order as to costs.

Service of the order

The court has provided a sealed copy of this order to the serving party: Enyo Law LLP, 5th Floor, 1 Tudor St, London, EC4Y 0AH

Davie, Peter

From: Amy Spencer <Amy.Spencer@enyolaw.com>
Sent: 11 October 2023 16:07
To: Woolley, Susan
Cc: Timothy Elliss; TTL@enyolaw.com; @ Project CSW Tulip Trading; Alex Jenkins; Greenhill-Hooper, Christian
Subject: RE: Tulip Trading v Bitcoin BL-2021-000313 [ENYOLAW-LIVE.FID45276]
Attachments: 2023.10.11 - Draft Order (Elliss 4)(4401212.1).doc

CAUTION! External sender | **PAUSE** before clicking on links or attachments.

Dear Ms Woolley

We would be grateful if the below email could be passed on to Mr Justice Mellor. We confirm this email and draft order have been CE-filed.

Dear Judge

We act for Defendants 2 to 12 in the above matter (“**D2-12**”).

As the court is aware, on 1 October 2023, D2-12 filed the Fourth Witness Statement of Timothy Elliss (“**Elliss 4**”), and (via email to the court on 2 October 2023) sought permission to rely on Elliss 4 and directions for responsive evidence, to be dealt with at the hearing on 3 October 2023. TTL objected to this in correspondence, which was shared with the court on 2 October 2023, including stating that Elliss 4 referred to privileged material.

Elliss 4 was not dealt with at the hearing on 3 October 2023. Following the hearing, D2-12 and the Claimant have liaised and agreed the following directions in regards to Elliss 4:

1. If TTL don’t object to the evidence going in, TTL’s substantive response to be filed on 18 October;
2. If TTL do object to the evidence going in:
 - a. 16 October: TTL’s evidence in response;
 - b. 20 October: D2-12’s evidence in reply;
 - c. w/c 23 October: urgent listing of the hearing of TTL’s objection with a time estimate of ½ a day plus 90 minutes pre-reading, to be heard by a judge other than Mr Mellor J in light of the fact TTL’s challenge may be based on material which they allege to be privileged
3. If TTL’s objection does not succeed:
 - a. 1 November: TTL’s evidence in response to the substance (if any)
 - b. 7 November: D2-12’s reply evidence (if any)

The parties agree that the timing is tight but should be workable, and will not impact the timings for skeletons for the CMC, which are due at 4:30pm on 9 November. As such, the parties respectfully request the court orders as set out above. A draft order in this regard is enclosed.

Yours faithfully

Enyo Law

Amy Spencer | Enyo Law LLP
Senior Associate

ENYO LAW

DISPUTES. NO CONFLICTS.

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nChain Company Statement

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by Team nChain

30 SEPTEMBER 2023 | 2 MIN READ



London 30th September: The Board has been made aware of statements made against the company overnight by its former CEO, following his summary dismissal last week. We are disappointed Mr. Ager-Hanssen has chosen to conduct himself in this way.

The facts are that concerns regarding the recent stewardship of the business, led the board to commission a detailed and independent investigation. The Board

Prior to the Board acting on the investigation's conclusions, on September 27 Mr. Ager Hanssen conducted himself in a serious and inappropriate manner which prompted the decision to dismiss Mr. Ager-Hanssen with immediate effect. This was communicated to Mr. Ager-Hanssen the same day.

The Board is determined that nothing will destabilise its well-resourced, innovative and growing company leading the way in global Blockchain technology and Web3 development. Our clients can be confident that we are led by executives with a strong vision and purpose, who themselves are supported by globally-renowned R&D experts and diligent employees. We are all focused on exploiting the company's vast IP library to help industries across the world to benefit from the security, transparency and scalability of the blockchain. We will not be diverted from this mission.

Separately, the Board has received a document from Mr. Ager-Hanssen highlighting his purported concerns. The Board takes its regulatory responsibilities extremely seriously and, while it does not concur with any of the assertions made by Mr Ager-Hanssen, it nonetheless determined to authorise an independent external review of the document's contents, which is now underway.

The company will not be commenting further until this review is completed.

Related

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nChain Company Statement

PRESS RELEASE | 29 09 2023 | 2 MIN READ

nChain Statement on departure of Christen Ager-Hanssen



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N244

Application notice

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government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter



Name of court High Court of Justice, Business and Property Courts Business List (ChD)	Claim no. 11 Jul 2023 BL-2021-000313
Fee account no. (if applicable) PBA0087558	Help with Fees - Ref. no. (if applicable) BL-2021-000313 H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Tulip Trading Limited (a Seychelles company)	
Defendant's name (including ref.) Bitcoin Association for BSV and 15 others VDL1.1/TWE	
Date	11 July 2023

1. What is your name or, if you are a legal representative, the name of your firm?

Enyo Law LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

Second to Twelfth Defendants

3. What order are you asking the court to make and why?

An order (a draft of which is enclosed) that (i) there be a preliminary issue trial on the question of whether TTL owns the Bitcoin in the Addresses (as defined in paragraph 29 of the Amended Particulars of Claim); and (ii) the Claimant pays security for the Enyo Defendants' costs up to and including the preliminary issue trial on an indemnity basis.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing

at a remote hearing

6. How long do you think the hearing will last? Is Hours Minutes

this time estimate agreed by all parties?

Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

The Claimant, Tulip Trading Limited

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

Enyo Law LLP will effect service on other parties' solicitors.

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

N/A

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

11

Month

07

Year

2023

Full name

Timothy William Elliss

Name of applicant's legal representative's firm

Enyo Law LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

1 Tudor Street

Second line of address

Town or city

London

County (optional)

Postcode

E	C	A	Y	D	A	H
---	---	---	---	---	---	---

If applicable

Phone number

Fax phone number

DX number

Your Ref.

VDL1.1/TWE

Email

Timothy.Ellis@enyolaw.com; TTL@enyolaw.com

Signature: *Craig S Wright*
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