

APPENDIX 1 TO DR WRIGHT’S WRITTEN CLOSING SUBMISSIONS

Table of Dr Wright’s Responses to COPA’s Original Forgery Allegations

	Document ID and Title (Bundle Ref)	Forgery Schedule Page {A/2/24}	Relevant Madden Appendix	Summary of Dr Wright’s Response (as set out in in Dr Wright’s written and oral evidence, including Wright 11, Appendices B and C, and Dr Wright’s cross-examination; and taking account of Mr Madden’s written and oral evidence)
1	ID_000073 Statistics assessment homework {L1/323}}	Page 6	PM38 {H/145}	<p><i>Appendix B [4]</i> <i>Dr Wright Cross-Examination {Day 2/154} to {Day 2/166}.</i></p> <p>1. <u>General points:</u></p> <p>a. Dr Wright states that COPA’s allegations presuppose a uniform workflow that does not reflect the iterative and sometimes sporadic nature of Dr Wright’s document creation process, which could include working on different parts of a document separately before merging them into a final document, as well as creating documents from templates.</p> <p>2. <u>Relationship with ID-000077:</u></p> <p>a. Dr Wright has stated that ID_000073 is not an edited version of ID_00077. Rather, both are edited versions of another document. Further, the two documents were different assignments for the same class, such that Dr Wright reused the same cover sheet.</p>

				<p>b. Dr Wright explains that the different authors for the two documents reflect his IT infrastructure and his use of virtual machines.</p> <p>c. Dr Wright believes that common embedded content reflects a common ancestor to both documents.</p> <p>d. Mr Madden’s analysis wrongly treats ID_000077 as coming after ID_000073, when his own analysis of the metadata shows the opposite, namely that the former was created several months after the latter. He has therefore wrongly dismissed the possibility that ID_000073 was created by editing an existing draft of ID_000077. This is an example of Mr Madden being too quick to conclude that a document had been manipulated, when other explanations for apparent anomalies were available. It is also one of many examples of Mr Madden making a lawyer’s point about allegedly anachronistic content in a document. See Mr Madden cross-examination at {Day 16/ 68/10} to {Day 16/74/13}.</p> <p>3. <u>Derivation from the Bitcoin Whitepaper:</u></p> <p>a. Dr Wright believes that hidden embedded content similar to the Whitepaper reflects a common precursor document. Mr Madden accepted that if the relevant text had already been drafted by Dr Wright in September 2005 in such a precursor document, that document could have been the source of these embedded passages {Day 16/75/17}.</p> <p>4. <u>Edit Times and other metadata:</u></p> <p>a. Short edit times overlooks Dr Wright’s cut-and-paste approach to document assembly.</p>
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2	<u>ID_000217</u> LLM Dissertation proposal 2 (Reliance) {L2/131}	Page 11	PM25 {H/118}	<p><i>Appendix B [5]</i> <i>Dr Wright Cross-Examination {Day 3/56/7} to {Day 3/71/14}</i></p> <ol style="list-style-type: none"> 1. <u>Grammarly tags, fonts, Microsoft schema</u>: Dr Wright has explained in relation to this category of anomalies that, for the reasons set out in Appendix A of Wright 9, it is likely that the document has been opened by an employee of nChain or one of Dr Wright’s other companies and that this has led to these elements becoming inserted into it. See also section V of these Closing Submissions. 2. <u>SSRN Upload</u>: Dr Wright believes that similarities between the document published on SSRN and ID_000217 are due to the former being a version of Dr Wright’s dissertation. 3. <u>Email to Lynn Wright</u>: Dr Wright explains in Appendix A of Wright 9, at [4] {L20/250/29}, that he emailed this document alongside others to Lynn Wright on 18 January 2020, as part of his preparation for the Kleiman Litigation and to check whether she could provide further information on them. 4. <u>Edit Time</u>: Dr Wright explains that COPA’s description of the (131-day) edit time as “implausible” overlooks the persistence feature of virtual machines and his Xen/Citrix environment (as explained at 2.5 to 2.11 of Appendix A of Wright 9). See also section V of these Closing Submissions.
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3	<u>ID_000227</u> Economics of Bitcoin nodes (Reliance) {L3/219}	Page 14	PM26 {H/121}	<p><i>Appendix B [6]</i> <i>Dr Wright Cross-Examination: {Day 3/15/17} to {Day 3/25/1}</i></p> <ol style="list-style-type: none"> 1. <u>MathType software and Microsoft Schema</u>: see row 2 above. 2. <u>URL reference and other content not visible in normal use</u>: <ol style="list-style-type: none"> a. Dr Wright believes that text from another document may have become merged with the text of this document, because of the computing environment described in Appendix A of Wright 9 and in Wright 10, and in particular his use of Citrix and Xen. b. Dr Wright also notes that the relevant URL links to a paper that does not relate to the text of ID_000227 and sees no reason why it would have been included in a previous version of footnote 5. 3. <u>Alleged precursor document</u>: the allegation that this document was created from a 2019 precursor document falls away if Dr Wright's response in paragraph 2 above is accepted. 4. <u>Edit time</u>: as explained in row 2 above, criticisms of long edit times overlook the persistence feature of virtual machines. 5. <u>Email to Lynn Wright</u>: see row 2 above.
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4	<u>ID 000254</u> Timecoin- ODT (Reliance) {L2/441}	Page 16	PM2 {H/17}	<p><i>Appendix B [7]</i> <i>Dr Wright's Cross-Examination: {Day 3/139/21} to {Day 3/154/12}</i></p> <ol style="list-style-type: none"> 1. <u>Conversion from Bitcoin White Paper</u>: Dr Wright has explained that <ol style="list-style-type: none"> a. Both this document and the White Paper were based on earlier LaTeX files. b. The White Paper diagrams were created with LaTeX and are not image files. c. To the extent there are typographical errors or anomalies on the face of the document, these might be the result of the draft nature of the document as well as the result of incorporating LaTeX elements within an OpenOffice document. d. The diagrams to be inserted in this document were produced separately in LaTeX to be embedded in the body of this document. The OBJ character reflects the fact that, when the code for the body of the document was compiled, the relevant embedded diagram was not found {Day 3/146:15} to {Day 3/147/9}. e. The indentations observed in the document's blank spaces were deliberately set by Dr Wright in anticipation for diagrams {Day 3/147/23} to {Day 3/149/11}. f. Irregular line-breaks and spacings were partly the result of Dr Wright's "steganographic watermarking" {Day 3/151/12}. g. Formatting irregularities shown in the calculations and formulae were the result of Dr Wright's use of Sweave, a package that integrates R (a statistical coding language) into LaTeX, and which by default produces un-tabulated output {Day 3/152/15} to {Day 3/153/8}.
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				<p>2. <u>Content of the document</u>: Dr Wright agrees that this document contains text matching the 2009 version of the White Paper but not the October or November 2008 versions. However, this document was a draft that was revised to produce the October 2008 White Paper. In any event, Dr Wright emphasised that he does not work in a linear fashion and often reverts to earlier drafts of documents when deciding to publish them {Day 3/153/23}.</p> <p>3. <u>Created and last accessed metadata</u>: Dr Wright has stated his belief that XCopy and related tools create metadata timestamps in a different way to Windows drag and drop, but in any event Mr Madden agreed that operating systems can be set to disable the updating of Last Accessed timestamps, and that the copying of a file using XCopy would result in a file with a Created timestamp post-dating its Last Modified timestamp. See also section V of these Closing Submissions.</p>
5	<p><u>ID_000258</u> Economic Security (Reliance) {L3/286}</p>	Page 18	<p>PM29 {H/126}</p>	<p><i>Appendix B [8]</i> <i>Dr Wright's Cross-Examination: {Day 3/25/2} to {Day 3/32/10}.</i></p> <p>1. <u>Economic Security article published on Medium</u>: COPA alleges that ID_000258 is an altered version of a blog post he published on the Medium website on 22 May 2019. As to this, Dr Wright's response is that:</p> <p>a. Deleted, hidden/embedded references in this document (from 2008) to contemporaneous attacks on Bitcoin are explained by the fact that Bitcoin was being criticised even before it became operational in 2009. See also {Day 3/31/3} to {Day 3/32/5}.</p> <p>b. It is likely that Lynn Wright, who edited some of Dr Wright's work, removed such "rants" from this document.</p>

				<p>c. Inconsistencies in the capitalisation of Bitcoin reflect the developmental stage of the concept at the time.</p> <p>2. <u>Editing Times</u>: see row 2 above.</p> <p>3. <u>Email to Lynn Wright of 18 January 2020</u>: see Row 2 above.</p>
6	<p><u>ID_000260</u> OpenOffice 2.4 document (Reliance) {L2/294}</p>	Page 20	<p>PM23 {H/107}</p>	<p><i>Appendix B [9]</i> <i>Dr Wright's Cross-Examination {Day 3/38/19} to {Day 3/47/8}.</i></p> <p>1. <u>Internal OpenOffice version number</u>: Dr Wright has explained that he set the metadata in this document at the time of its creation (8 or 9 March 2008) to refer to <u>OpenOffice</u> version 2.4, using LaTeX, and obscured the version number deliberately, so that it would appear that he wrote this document in the future. Dr Wright had in the past done this to documents as part of his teaching. Dr Wright explained that setting metadata “wrongly” in this way was sometimes used as a defence against attacks that were targeted at specific versions of applications.</p> <p>2. <u>Allegation of import of content from an external document</u>: Dr Wright denies that images in this document have been imported from another document and confirms his recollection that they were created using the Cran(R) statistical programming language.</p> <p>3. <u>Edit time</u>: Dr Wright recalls that this document was compiled from LaTeX and Cran(R) using OpenOffice and a program called Sweave. Dr Wright believes that the metadata time fields in this document may have been updated each time it was</p>

				recompiled in a way that reflected the most recent build, rather than the cumulative time spent on the document, which would explain the apparently lengthy edit time reported.
7	<u>ID_000367</u> Block diffusion within Bitcoin (Reliance) {L3/185}	Page 21	PM30 {H/129}	<p><i>Appendix B [10]</i> <i>Dr Wright's Cross-Examination: {Day 2/144/16} to {Day 2/153/7}.</i></p> <ol style="list-style-type: none"> 1. <u>Similarity with 2012 Research Gate Article</u>: Dr Wright accepts that there is content in this document that is similar to a 2012 article by Ming Liu and Lindu Xiao. However, he has stated that he had prior access to the material in that article through the (formal and informal) exchange of information between academics and his interaction with peers from Chinese universities. He explained that, at the time, he was studying at the University of Newcastle, which was a medical research institution. 2. <u>Fonts</u>: Dr Wright believes that, as a technical matter, the anomalous fonts in this document cannot be the result of copying Pdf text into a Word document. In any event, he suggested that the relevant fonts could have come from the pre-publication papers which he had used as sources for this document {Day 2/151/20}. 3. <u>Edit time</u>: see row 2 above. 4. <u>Email to Lynn Wright</u>: see row 2 above.

8.	<u>ID_000396</u> Non-cooperative finite games (Reliance) {L3/203}	Page 27	PM27 {H/122}	<p><i>Appendix B [11]</i> <i>Dr Wright's Cross-Examination {Day 2/125/19} to {Day 2/129/4}</i></p> <ol style="list-style-type: none"> 1. <u>Embedded comments post-dating document</u>: Dr Wright explains that the structure of the document may have been changed, without it being saved, due to his sharing of documents across Windows and Linux. 2. <u>Short edit time</u>: Dr Wright states that he typically uses cut and paste operations from various documents across multiple servers, particularly when he uses voice-to-text applications like Dragon NaturallySpeaking. 3. <u>Overlapping edit times of other document</u>: Dr Wright believes that this reflects his working process whereby documents are worked on concurrently across various machines.
9	<u>ID_000465</u> The Kleiman email {L2/318}	Page 31	PM18 {H/83}	<p><i>Appendix B [12]</i> <i>Dr Wright Cross-Examination {Day 4/74/6} to {Day 4/9/13}</i></p> <ol style="list-style-type: none"> 1. Dr Wright maintains that he did send an email to David Kleiman on 12 March 2008, with similar content to that in ID_000465, but that ID_000465 is not that e-mail. 2. Indeed, Dr Wright does not rely on ID_000465 to establish his identity as Satoshi Nakamoto. It is not a Reliance Document. 3. Dr Wright believes that the authentic email is on a QNAP server, to which he does not have access.

				<p>4. Dr Wright has explained that this document was disclosed by Ira Kleiman during the Kleiman litigation.</p> <p>5. Dr Wright does not contend that ID_000465 or other related e-mails are authentic and understands that ID_000464 appears to originate from a machine called PCCSW01 at IP 103.39.121.201. In Appendix B, Dr Wright wrongly stated that this IP address was associated with India and the USA. He now accepts that it appears to have been registered in Australia and believes it is associated with another individual based in Brisbane, who worked with Mr Kleiman {Day 4/85/2}. .</p>
10	<p><u>ID_000536</u> Backdated White Paper {L2/474}</p>	Page 37	<p>PM3 {H/20}</p>	<p><i>Appendix B [13]</i> <i>Dr Wright Cross-Examination: {Day 3/160/8} to {Day 3/170/13}</i></p> <p>COPA alleges that this document has been created from the White Paper and edited to make it appear as if it was precursor work. Dr Wright’s response to the specific grounds for that allegation is as follows:</p> <ol style="list-style-type: none"> 1. <u>Creation timestamps partly matching White Paper:</u> Dr Wright explains that both this document and White Paper were compiled from LaTeX code, and that in each case such code included him manually setting the creation date metadata. Dr Wright believes that when he later published the White Paper as Satoshi Nakamoto, he must have modified the year and month fields in the LaTeX code for this document {Day 3/161/6} to {Day 3/1633}. 2. <u>Edited version of ID_000548, which contains deleted information from 2019:</u> Dr Wright believes that this is an implausibly complicated way to fabricate a document.

				<p>3. <u>Content matches March 2009 White Paper but not the other earlier and later versions:</u> this wrongly presupposes that Dr Wright works in a linear manner and never undoes any changes.</p> <p>4. <u>“Touchup textedit” flags indicating that it has been edited in Adobe Software:</u> Dr Wright observes that the relevant edit flags exist in multiple applications and that, again, what is being alleged is implausibly complicated. In any event, Dr Wright explained in oral evidence that this document could have been accessed by others at a later time using Acrobat DC {Day 3/167/7} to {Day 3/168/25}.</p>
11	<p><u>ID_000550</u> Bitcoin SEIR-C (Reliance) {L3/237}</p>	Page 46	PM1 {H/1}	<p><i>Appendix B [14]</i> <i>Dr Wright Cross-Examination: {Day 2/132/20} to {Day 2/144/18}.</i></p> <p>1. <u>Grammarly, MathType, Microsoft schemas and edit times:</u></p> <p>a. Dr Wright does not dispute that Grammarly, MathType and post-dated schemas are present in IT_000550, but believes that they are present as a result of someone in nChain opening the document in 2017 or later, and the effects he has described in Appendix A of Wright 9, causing these elements to become embedded in the document.</p> <p>b. As to the 70-day edit time, see row 2 above.</p> <p><u>Hidden content:</u> Dr Wright does not dispute the presence of the hidden content identified by Mr Madden in PM1, but explains that this has arisen as a result of the corruption of the document while it was held at nChain or other entities listed in the Chain of Custody schedule. See further at {Day 2/136} to {Day 2/140/6}.</p>

12	<u>ID_000554</u> Converted Code2Flow flowchart (Reliance) {L3/326}	Page 50	PM10 {H/63}	<p><i>Appendix B [15]</i> <i>Dr Wright Cross-Examination: {Day 4/31/11} to {Day 4/43/10}</i></p> <ol style="list-style-type: none"> 1. Dr Wright denies that this document has its origin in ID_000375, although he does not dispute that the latter was created at some point after 2012/2013. 2. Dr Wright cannot remember exactly how ID_000554 was created but thinks that at least some of its contents were produced using IBM RationalRose. Nor can Dr Wright recall if this is his original document or something other people within his organisations developed. 3. Dr Wright emphasised in his oral evidence that this was a document was related to work carried out by a team of people developing code for what became iDaemon and Teranode {Day 4/32/16} and that the document may have been opened at various times by others on that team.
13	<u>ID_000739</u> Bitcoin.exe– hex edited {L3/474}	Page 56	PM12 {H/68}	<p><i>Appendix B [16]</i> <i>Dr Wright Cross-Examination: {Day 4/43/22} to {Day 4/53/7}.</i></p> <ol style="list-style-type: none"> 1. This is not a Reliance Document and Dr Wright does not contend that it is authentic. 2. Dr Wright has explained that this document was found on an ex-staff member's device and was disclosed in the Kleiman litigation. He accepts that it has been hex-edited and believes that this was done to further Mr Kleiman's case against him.

14	<u>ID_001379</u> Project BlackNet paper (Reliance) {L1/79}	Page 64	PM8 {H/60}	<p><i>Appendix B [17]</i> <i>Dr Wright Cross-Examination: {Day 2/56/22} to {Day 2/68:23}.</i></p> <ol style="list-style-type: none"> 1. Dr Wright accepts that this document is a 2014 print or conversion (into PDF form) of a 2002 document. He notes that numerous individuals (up to 300) may have accessed this, and other, documents stored on a shared file server, from which they were copied to an ex-employee’s laptop.
15	<u>ID_001546</u> Spoofed email from CW in the name of Satoshi {L8/338}	Page 72	PM21 {H/104}	<p><i>Appendix B [18]</i> <i>Dr Wright Cross-Examination: {Day 4/60/9} to {Day 4/68/2}</i></p> <ol style="list-style-type: none"> 1. This is not a Reliance Document and Dr Wright has not relied on it in these proceedings. 2. Dr Wright does not claim to have sent this email and has explained that it was not sent from his computer or mailbox. The email originates from a computer with the name “cwright”, which Dr Wright states is not his computer. Dr Wright has explained that he does not name systems after himself. 3. Dr Wright believes that someone sent this email to the ATO, after which the ATO disclosed it to Ira Kleiman, who then disclosed it in the Kleiman litigation.

16	<u>ID_003455</u> NAB Banking Records {L15/100}	Page 85	PM17 {H/78}	<p><i>Appendix B [19]</i></p> <p><i>Dr Wright Cross-Examination: {Day 2/29/14} to {Day 2/44/17}</i></p> <ol style="list-style-type: none"> 1. This e-mail is not and has never been a Reliance Document. COPA’s suggestion in cross-examination that Dr Wright only “abandoned” this document after Mr Madden had concluded it was inauthentic is therefore misconceived. {Day 2/42}. 2. In his Third Witness Statement in the BTC Core Claim {E1/4}, Dr Wright has set out what he understands to be the provenance of the screenshots shown in this email, which he does not believe are, and which he has not claimed to be, authentic. 3. In summary, Dr Wright’s evidence is that: <ol style="list-style-type: none"> a. The screenshots were sent to him on 9 or 10 June 2019 by one of his US lawyers in the context of the Kleiman Litigation, who in turn had received it from a pseudonymous Reddit user. b. Dr Wright then forwarded those screenshots to Jimmy Nguyen (as shown in ID_003455) to discuss them. Dr Wright did not believe that they were genuine because, among other reasons, his NAB account had already been closed for 10 years. c. This email was not put forward by him as evidence in the Kleiman Litigation.
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				4. For the avoidance of doubt, reference to this document at footnote 112 of Wright 11 was an error and was intended to be a reference to an image of the Vistomail site {Day 2/44/14}.
17	<u>ID_004011</u> Coffee-stained printout of the BWP (Reliance) {L2/234}	Page 82	PM3 {H/20}	<p><i>Appendix B [20]</i> <i>Dr Wright Cross-Examination {Day 4/13/11} to {Day 4/24/2}</i></p> <p>1. Dr Wright has explained that:</p> <ul style="list-style-type: none"> a. this document was found in a drawer in 2019, the course of his disclosure exercise for the Kleiman Litigation; b. it was scanned in September 2019 by Ontier; c. some of the handwritten notes visible on the document date from that time and were made in the context of his work on an upcoming patent, not for the purposes of legal proceedings; and d. other handwritten notes, which COPA suggested were were made to appear as though they dated from 2008, were in fact notes by Dr Wright to himself in 2019 as reminders to seek certain information that he believed would assist him in the Kleiman litigation {Day 4/20/12}.

18	<u>ID_004013</u> Handwritten BDO minutes (Reliance) {L2/159}	Page 91	PM5 {H/31}	<p><i>Appendix B [21]</i> <i>Dr Wright Cross-Examination: {Day 3/102/24} to {Day 3/114/11}.</i></p> <ol style="list-style-type: none"> 1. Dr Wright does not accept that the notepad on which these minutes are shown are identical to Exhibit MS1 (and that it was not printed until November 2009). 2. In Appendix B {CSW/2/67}, Dr Wright identified, by reference to grid lines, differences between Exhibit MS1 and this document – in particular, in the size of the printed number “3” in each document and also in the layout of the emblem in the bottom right corner. 3. Mr Madden did not accept Dr Wright’s analysis, but he chose not to engage with it, or test it, in any of his subsequent reports. This is despite him (i) accepting that Dr Wright’s comparison showed a difference in the size of the “3” in each document, and (ii) recognising that using grid lines was a sensible way to compare two printed documents visually. In the end, Mr Madden accepted that he could not demonstrate, from a digital perspective, that this document had been backdated by Dr Wright in any way. See {Day 16/51/3} to {Day 16/58/19}. 4. Dr Wright has disclosed an email from him to Alan Granger from 17 August 2007, indicating that the two did meet on that date.
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19	<u>ID_004019</u> JSTOR Article – Tominaga Nakamoto {L2/245}	Page 93	PM6 {H/40}	<p><i>Appendix B [22]</i> <i>Dr Wright Cross-Examination {Day 2/18/10} to {Day 2/25/18}.</i></p> <ol style="list-style-type: none"> 1. Dr Wright has explained that, rather than this document having been produced from a document uploaded to JSTOR around 2015, the 2015 JSTOR document was itself copied from ID_004019. 2. Dr Wright believes that the JSTOR article relied on by COPA was uploaded after he had publicly stated that he had sourced the Satoshi Nakamoto pseudonym from this work. 3. Mr Madden’s conclusion that this document has been backdated relies on: (1) inconsistencies in the fonts used in the date and timestamp in the header on the front page; and (2) the design of the JSTOR footer not matching the design of footers appearing on comparator documents that he was provided with by Bird & Bird. Neither of these factors provide a solid basis for his conclusion. Taking each in turn: <ol style="list-style-type: none"> a. Mr Madden did not identify in his reports what sort of editing/manipulation of the header was being contemplated. In cross-examination, he said that he had in mind the editing of a PDF. He accepted that the only reason for such editing to lead to font differences would be that the tool being used did not recognise the original document’s font but said that he did not go into “<i>that sort of speculation</i>” because he was only looking at a scan of a document. See {Day 16/61/2} to {Day 16/66/6}. b. Mr Madden accepted that his analysis of the JSTOR footer of this document depended on the comparator documents that he was provided with by Bird & Bird, and that neither he, nor Bird & Bird obtained confirmation from JSTOR itself of the style of footer used by all JSTOR online repositories throughout the
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				<p>world at the relevant time. He was unable to confirm to the court that the comparators relied upon were a full and complete set of all JSTOR footers in use during January 2008, or whether different footers might have been in use for downloads of materials from JSTOR's repositories in different parts of the world. See {Day 16/66/7} to {Day 16/68/9}.</p>
20	<p><u>ID_004077</u> MYOB Accounting records (Reliance) {L5/150}</p>	Page 95	<p>PM7 {H/47}</p> <p>PM42 {H/209}</p> <p>Madden 5 {G/9/15}</p>	<p><i>Appendix B [23]</i> <i>Dr Wright Cross-Examination: {Day 3/114/12} to {Day 3/139/6} and {Day 15/10/14} to {Day 15/43/25}.</i></p> <ol style="list-style-type: none"> 1. As to the allegation that, prior to 2014, WIIL was an inactive shell company that did not operate, Dr Wright has set out his response in Wright 11. In summary: <ol style="list-style-type: none"> a. The emails purportedly dating from 2014 on which COPA relies are not from Dr Wright and were disclosed in the Kleiman Litigation. Dr Wright believes them to be inauthentic. He believes they were fabricated, and planted in his computer systems, by ex-employees of companies he founded who were working in conjunction with Ira Kleiman, so as to assist Mr Kleiman's claim against Dr Wright in the United States: see Wright 11 [41]-[53] where (using ID_001414 {L9/210/1} as an illustrative example) Dr Wright has explained by reference to publicly available DNS records that Abacus was not using a Google e-mail domain in 2014 and only began to do so in April 2015 {CSW/1/9}, contrary to the metadata of the relevant e-mails. b. This was explored further with Mr Madden during his cross-examination. Mr Madden had suggested at Madden 5, para 54, that the DNS records provided by Dr Wright "<i>are not a complete record of servers used at all times, but are</i>

				<p><i>informed by snapshots taken by the relevant service. The presence of gaps does not indicate that there was no mail server in use at the time, merely that the mail server at that time is not known" {G/9/16}. However, the relevant passage of the FAQ section of dnshistory.org states that the website aims to check "every domain at least once per month" {G/9/17}. When it was put to Mr Madden that, in the light of that passage, it beggars belief that no check was made in respect of Abacus between November 2010 and April 2015, Mr Madden's provided an explanation that was difficult to understand and involved him providing anecdotal evidence of his experience of operating his own domains, none of which was contained in his report(s). See {Day 16/96/1} to {Day 16/99/15}.</i></p> <p>c. Dr Wright himself relies on various invoices, described at Wright 11 [282] – [292], which he believes to be authentic and to date from between 2009 and 2011. Dr Wright explains that these show that he in fact arranged for the incorporation and purchase of WIIL in 2009.</p> <p>2. As to COPA's attacks on Dr Wright's MYOB accounting screenshots, this was explored at {Day 3/114/12} to {Day 3/139/6} and {Day 15/10/14} to {Day 15/43/25}. In summary:</p> <p>a. Dr Wright believes that this screenshot was captured by Ontier, his former solicitors, after he had provided them access to his accounts in 2019 and before 6 March 2020 (see {Day 3/125/23} to {Day 3/128/9}).</p> <p>b. Dr Wright says that other logs showing that he inputted certain entries into MYOB on 6 March 2020 relate to a separate exercise. In particular, and in relation to the analysis at PM42 of certain myox files, Dr Wright agrees that the Wright International Investments Ltd myox file examined by Mr Madden was created in March 2020. He has explained that as part of the Kleiman litigation, he was required to provide a list of all his Bitcoin holdings, and therefore needed an</p>
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				<p>extract from the MYOB accounts for WILL. He states that, for this purpose, he had: (i) arranged to receive an extract of the online MYOB system in QIF format; (ii) opened a local version of MYOB on his computer; and (iii) on 6 and 7 March 2020 manually transferred entries from that QIF file to MYOB (see Wright 11, Appendix B [23.8]- [23.15]). Dr Wright further explained in oral evidence that the purpose of this exercise was to comply with his obligations in the US proceedings without referring to information concerning the Tulip Trust; see {Day 3/123}- {Day 3/124}.</p> <p>c. Dr Wright emphasised repeatedly during his cross-examination on Day 15 that Mr Madden’s analyses of the “New MYOB” files in Madden 2 (PM42) and in Madden 5 were flawed, because they were based on running and analysing a file extracted from the Live MYOB database on a local machine (see Madden 5, para 8 {G/9/5} and Dr Wright at {Day 15/14}), instead of analysing and testing the live, web-based version of the software directly. See, for example, {Day 15/35/10} and {Day 15/39/9} to {Day 15/41/12}.</p> <p>d. Dr Wright believes that the MYOB Live version of the software has been updated on several occasions over the years, so as to update both the schemas and the formatting of content (Wright 11 [298]-[312]), and that this explains:</p> <ul style="list-style-type: none"> (i) the sequence of entries in the session security logs set out by Mr Madden at Madden 5, para 17 {G/9/6} (see Dr Wright’s evidence at {Day 15/25/17}); (ii) the alleged anomalies in the software version records, shown in Madden 5, para 19 {G/9/8} (see Dr Wright’s evidence at {Day 15/28/20}) and {Day 15/32}); and
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				<p>(iii) Mr Madden’s observation that older entries in Dr Wright’s MYOB files contain session ID and other security information that suggest they must have been authored after 2016 (Madden 5, para 10 {G/9/5}); Dr Wright explained that such information is added to older files when such files are loaded into the live database {Day 15/40/14} to {Day 15/42/8}.</p> <p>e. Dr Wright has explained that the monetary value assigned by him to Bitcoin in the accounts reflected what he considered Bitcoin to be worth at the time (Wright 11, Appendix B [23.6] and {Day3/129}).</p>
21	The Blacknet Abstract {L14/294/1}	N.A. Raised in PoC, paras 26-27 {A/2/29}	N.A.	<p><i>Appendix C [2]</i> <i>Dr Wright’s Cross-Examination: {Day 2/85/23} to {Day 2/98/4}.</i></p> <ol style="list-style-type: none"> 1. COPA’s case is that by a tweet on 10 February 2019 Dr Wright asserted that the abstract of project entitled “Blacknet” was written in 2001 and submitted to the Australian Government, and that this abstract was in fact copied from the abstract of the Bitcoin White Paper. 2. Dr Wright had clarified in paragraph 45 of his Defence that his intention through this post was not to suggest that the abstract shown in the bottom right of the tweet was from 2001. He had applied for funding from AUSIndustry in 2009 and 2010, and the relevant image was of a paper submitted for a later application.

22	SSRN Submission ID_000537 {L5/28/1}	N.A. Raised in PoC, paras 30-34 {A/2/11} Def, para 52-59 {A/3/17}	PM3 {H/20/41}	<p><i>Appendix C [4]</i></p> <ol style="list-style-type: none"> 1. In paragraphs 30 to 34 of the particulars of claim, COPA refers to two documents uploaded SSRN by Dr Wright in August 2019 and alleges that they were copies of the White Paper whose metadata was manipulated to make them appear to date from 2008. 2. In paragraphs 52-59 of his Defence, and at Appendix C [4], Dr Wright states that: <ol style="list-style-type: none"> a. He attempted to post the first document under the name Satoshi Nakamoto, but that this was rejected by SSRN due to the use of a pseudonym. b. He subsequently posted the second document under his real name. c. Each document had a reference to Dr Wright's US copyright registration of 13 April 2019. His aim in posting these documents was to assert his authorship. d. He does not claim that these documents were created in 2008 or 2009, but that they were created in 2019 based on the version of the White Paper released in March 2009. e. Because these documents were compiled from LaTeX code, their metadata reflects what was set in that code, not when it was compiled.
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23	Email to Uyen Ngueyn ID_001668 {L8/72/1}	N.A. Raised in: PoC, para 66 {A/2/20} Def, para 85 {A/3/25}	N.A.	<p><i>Appendix C [5]</i></p> <ol style="list-style-type: none"> 1. In paragraph 66 of the particulars of claim COPA refers to an email apparently sent by Dave Kleiman to Uyen Nguyen on 20 December 2012. COPA’s initial disclosure produced a copy of the document from the proceedings in Florida and COPA alleges that this was forged by Dr Wright for the purpose of those proceedings. 2. Dr Wright responded to this allegation in para 85 of his Defence and in Appendix C stood by the position set out therein. He was not cross-examined on this document. 3. In short, Dr Wright states that Ira Kleiman had sought to use this document, which Dr Wright believes was adverse to his case in those proceedings, to assert that the late Dave Kleiman had been Dr Wright’s business partner. Dr Wright states that his intention was to use this document to demonstrate that Mr Kleiman was seeking to misrepresent documents in support of his case, but that he had no interest in it once it was no longer being asserted against him.
24	Tulip Trust document ID_003329 {L15/86}	N.A. Raised in: PoC, para 66A {A/2/20} Def, para 85A {A/3/26}	N.A.	<p><i>Appendix C [6]</i></p> <ol style="list-style-type: none"> 1. In paragraph 66A of the particulars of claim COPA claims that “<i>a computer forensic analysis</i>” shows that a Deed of Trust document dated 23 October 2012 was backdated and was not created until at least 22 May 2015. COPA claims that this document was found to be backdated in the Order of Justice Reinhart dated 27 August 2019.

				<p>2. Dr Wright responded to this allegation in paragraph 85A of his Defence, and later confirmed the truth if those paragraphs in Appendix C. In summary, Dr Wright states in Appendix C that:</p> <ul style="list-style-type: none">a. He was ordered in the Kleiman litigation to search for documentation concerning rights to Bitcoin and, in response, his lawyers conducted searches and located ID_003329.b. Dr Wright was not a party to this document nor was he a trustee of any of the entities mentioned.c. Dr Wright believes that this document was doctored by someone.
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