

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

Claim No: IL-2021-000019

B E T W E E N :

(1) CRYPTO OPEN PATENT ALLIANCE

Claimant

-and-

(1) DR CRAIG STEVEN WRIGHT

Defendant

AGREED READING LIST

It is suggested that reading is conducted in the following order. This list also indicates which pre-reading may be skipped if the Judge is already on top of those materials due to prior hearings.

Time estimate: up to 4 days.

	Description	Date	Opus Reference
SKELETONS			
1.	COPA's skeleton argument	29 January 2024	
2.	The Developers' skeleton argument	29 January 2024	
3.	Dr Wright's skeleton argument	29 January 2024	
RELEVANT DOCUMENTS			
4.	Bitcoin White Paper (version published in March 2009)	24/03/2009	{L3/231/1}
PLEADINGS			
5.	Re-Re-Re-Amended Particulars of Claim (to the extent needed, given that it has been read before)	31/10/2023	{A/2/1}

6.	Original Schedule of Dr Wright's Forged Documents (note that the 20 forgeries on which COPA focusses are identified in the letter at {M/2/684} and are listed in the appendix to this reading list, with references)	31/10/23	{A/2/24}
7.	Re-Re-Amended Defence (to the extent needed, given that it has been read before)	20/4/2023	{A/3/1}
8.	Re-Amended Reply (to the extent needed, given that it has been read before)	21/04/2022	{A/4/1}
9.	Schedule of Dr Wright's Further Forged Documents	23/01/2024	{A/16/1}
10.	Amended Particulars of Claim and Defences in the BTC Core claim (for context and to show which issues may stray outside of the Identity Issue)	14/02/23 10/03/23 3/4/23	{A1/2/1} {A1/3/1} {A1/4/1}
PRINCIPAL WITNESS STATEMENTS FOR DR WRIGHT			
11.	First Witness Statement of Dr Craig Wright	28/07/2023	{E/1/1}
12.	Second Witness Statement of Dr Craig Wright	09/10/2023	{E/2/1}
13.	Third Witness Statement of Dr Craig Wright	19/10/2023	{E/3/1}
14.	Fourth Witness Statement of Dr Craig Wright	23/10/2023	{E/4/1}
15.	Fifth Witness Statement of Dr Craig Wright	01/12/2023	{E/20/1}
16.	Seventh Witness Statement of Dr Craig Wright	11/12/2023	{E/22/1}
17.	Eight Witness Statement of Dr Craig Wright	20/12/2023	{E/23/1}
18.	Ninth Witness Statement of Dr Craig Wright	21/12/2023	{E/26/1}
19.	Appendix A to Ninth Witness Statement of Dr Craig Wright	21/12/2023	{F/162/1}
20.	Tenth Witness Statement of Dr Craig Wright	3/01/2024	{E/31/1}
21.	Appendices B and C of Eleventh Witness Statement of Dr Craig Wright (certain paragraphs of which are subject to objections by COPA)	12/01/2024	{CSW/2/1} {CSW/3/1}
22.	First Witness Statement of Stefan Matthews	28/07/2023	{E/5/1}
23.	Second Witness Statement of Stefan Matthews	21/12/2023	{E/27/1}
EXPERT REPORTS OF BOTH PARTIES			
24.	First Expert Report of Patrick Madden (COPA)	01/09/2023	{G/1/1}
25.	Appendices to First Expert Report of Patrick Madden which relate to the 20 forgeries from the original Schedule on which COPA focusses (as set out in the appendix)	01/09/2023	See appendix to this Reading List
26.	First Expert Report of Simon Placks (Dr Wright)	23/10/2023	{I/1/1}

27.	Second Expert Report of Patrick Madden (COPA)	17/11/2023	{G/3/1}
28.	Appendix PM43 to the Second Expert Report of Patrick Madden (concerning Dr Wright's Chain of Custody Information)	17/11/2023	{H/219/1}
29.	Third Expert Report of Patrick Madden (COPA) (to the extent needed, given that it was read for the PTR)	07/12/2023	{G/5/1}
30.	First Joint Statement of Patrick Madden and Simon Placks	08/12/2023	{Q/2/1}
31.	Fourth Expert Report of Patrick Madden (COPA)	18/01/2024	{G/6/1}
32.	Appendix PM46 to the Fourth Expert Report of Patrick Madden (concerning material on the BDO Drive)	18/01/2024	{H/278/1}
33.	Second Expert Report of Simon Placks (Dr Wright)	18/01/2024	{I/8/1}
34.	Second Joint Statement of Patrick Madden and Simon Placks	22/01/2024	{Q/4/1}
35.	First Expert Report of Spencer Lynch (Dr Wright)	18/01/2024	{I/5/1}
36.	First Expert Report of Arthur Rosendahl (COPA)	18/01/2024	{H/7/1}
37.	Joint Statement of Patrick Madden and Spencer Lynch	22/01/2024	{Q/6/1}
38.	Joint Statement of Arthur Rosendahl and Spencer Lynch	22/01/2024	{Q/5/1}
39.	First Expert Report of Sarah Meiklejohn	23/10/2023	{G/2/1}
40.	First Expert Report of ZeMing M.Gao (COPA suggests that only Part II: Signing Sessions and 2 May 2016 Post is necessary (from {I/2/51}))	23/10/2023	{I/2/1}
41.	Joint Expert Report of Sarah Meiklejohn and ZeMing M.Gao and annexes	09/01/2023	{Q/3/1} {Q/3.1/1} {Q/3.2/1}
EXHIBITS AND DISCLOSURE DOCUMENTS			
42.	Chain of Custody of Reliance Documents (this need not be read fully, but a refresher of its contents will suffice)	13/10/2023	{K/11/1}
43.	Exhibit CSW5 (which relates to Dr Wright's responses to RFI questions on the White Paper; need not be read fully, but a review would help)	23/10/2023	{L19/257/1}
44.	Craig Wright – 'Jean-Paul Sartre, signing and significance' email and draft sent by Dr Wright	29/04/2016	{L13/88/1}, {L14/327/1}
45.	Sartre blog as published	02/05/2016	{L18/257/1}
REMAINING WITNESS EVIDENCE (Note: Mainly short statements, to be read as time permits. Dr Wright invites the Court to read the passages in the hearsay evidence of Mr Andresen and Mr Don Lynam (row 47 below), as referred to in Dr Wright's Skeleton Argument, before trial.)			
46.	Statement for the Developers: Wuille 1	13/10/23	{C1/1/1}

47.	Statements of remaining witnesses for Dr Wright: Jenkins 1 {E/6/1}; Yousuf 1 {E/7/1}; DeMorgan 1 {E/8/1}; Bridges 1 {E/9/1}; Pang 1 {E/10/1}; Archbold {E/11/1}; Maxwell Lynam {E/13/1}; Jones 1 {E/14/1}	Various	Various – see column to left
48.	Hearsay notice materials for Dr Wright: Donald Lynam {E/16/1}; Andresen {E/17/1} {E/18/1}; Sinclair {E/19/1}.	Various	Various – see column to left
49.	Statements of witnesses for COPA: Andrae 1 {C/1/1}; Malmi 1 {C/2/1}; Pearson 1 {C/3/1}; Bernstein 1 {C/4/1}; Cellan-Jones 1 {C/5/1}; Wilcox O’Hearn 1 {C/6/1}; Trammell 1 {C/7/1}; Hudson {C/8/1}; Back 1 {C/9/1}; Bohm 1 {C/10/1}; Ford 1 {C/11/1}; Lee 1 {C/12/1}; Hinnant 1 {C/18/1}; MacFarlane 1 {C/19/1}; Loretan 1 {C/20/1}; Gerlach 1 {C/20.1/1}; Back 2 {C/21/1}; Hearn 1 {C/22/1}; Stroustrup 1 {C/24/1}; Malmi 2 {C/24/1}	Various	Various – see column to left
50.	Hearsay notice materials for COPA: Furche {C/13/1}; de Groot {C/16/1}; Stathakis and Lee {C/17/1}; Wrightson {C/17.1/1}; Chesher {C/26/1}; Lynn Wright {C/27/1}; Wei Dai {C/28/1}.	Various	Various – see column to left
STATEMENT OF DR WRIGHT FOR WHICH ADMISSIBILITY IS IN ISSUE			
51.	Eleventh Witness Statement of Dr Craig Wright (plus Appendices B and C) – Main body of witness statement to be reviewed only briefly to prepare for admissibility argument on first day of trial.	12/01/2024	{CSW/1/1} {CSW/2/1} {CSW/3/1}

APPENDIX

ALLEGED FORGERIES IDENTIFIED IN COPA'S PLEADINGS / SCHEDULES

The alleged forgeries from COPA's Particulars of Claim

1. C00000010 (BlackNet Abstract)
2. ID001318 (Kleiman Email) – addressed in PM18 {H/83/1}
3. C00001098 (SSRN Upload) – addressed in PM3 {H/20/1}
4. ID001668 (Kleiman / Nguyen email)
5. C00000560 (Tulip Trust Deed)

The 20 alleged forgeries from COPA's first Schedule

1. ID000073 – addressed in PM38 {H/145/1}
2. ID000217 – addressed in PM25 {H/118/1}
3. ID000227 – addressed in PM26 {H/121/1}
4. ID000254 – addressed in PM2 {H/17/1}
5. ID000258 – addressed in PM29 {H/126/1}
6. ID000260 – addressed in PM23 {H/107/1}
7. ID000367 – addressed in PM30 {H/129/1}
8. ID000396 – addressed in PM27 {H/122/1}
9. ID000465 – addressed in PM18 {H/83/1}
10. ID000536 – addressed in PM28 {H/124/1}
11. ID000550 – addressed in PM1 {H/1/1}
12. ID000554- addressed in PM10 {H/63/1}
13. ID000739 – addressed in PM12 {H/68/1}
14. ID001379 – addressed in PM8 {H/60/1}
15. ID001546 – addressed in PM14 {H/73/1}
16. ID003455 – addressed in PM17 {H/78/1}
17. ID004011 – addressed in PM3 {H/20/1}
18. ID004013 – addressed in PM5 {H/31/1}
19. ID004019 – addressed in PM6 {H/40/1}
20. ID004077 – addressed in PM7 and PM42 {H/209/1}

The 20 alleged forgeries from COPA's further Schedule

1. Main.tex - addressed in Rosendahl 1 and Lynch 1
2. E-Cash-main.tex – addressed in Rosendahl 1 and Lynch 1
3. BDOPC.raw – addressed in Madden 4 and Lynch 1
4. ID004648 – addressed in Madden 3 and Madden 4
5. ID004682 – addressed in Madden 3
6. ID004687 – addressed in Madden 3 and Madden 4
7. ID004695 – addressed in Madden 3 and PM46
8. ID004697 – addressed in Madden 3
9. ID004712 – addressed by fact evidence
10. ID004713 – addressed by fact evidence
11. ID004715 – addressed in Madden 4 and PM46
12. ID004716 – addressed in Madden 4 and PM46
13. ID004719 – addressed in Madden 4 and PM46
14. ID004722 – addressed in PM46
15. ID004723 – addressed in PM46
16. ID004729 – addressed in PM46
17. ID004732 – addressed in Madden 3 and PM46
18. ID004733 – addressed in Madden 3 and PM46
19. ID004734 – addressed in Madden 3 and PM46
20. ID004736 – addressed in Madden 3 and PM46