

Made on behalf of Defendant in COPA Claim
Made on behalf of Claimants in the Coinbase Claim, the Kraken Claim and the BTC Core Claim
Third Witness Statement Dr Craig Steven Wright
Dated 19 October 2023
Exhibits CSW1-CSW4

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

Claim No. IL-2021-000019
(the “COPA Claim”)

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

Claimant

- and -

DR CRAIG STEVEN WRIGHT

Defendant

Claim No. IL-2022-000035
(the "Coinbase Claim")

BETWEEN:

(1) DR CRAIG STEVEN WRIGHT
(2) WRIGHT INTERNATIONAL INVESTMENTS LIMITED

Claimants

- and -

(1) COINBASE GLOBAL, INC.
(2) CB PAYMENTS, LTD
(3) COINBASE EUROPE LIMITED
(4) COINBASE, INC.

Defendants

Claim No. IL-2022-000036
(the “Kraken Claim”)

BETWEEN:

(1) DR CRAIG STEVEN WRIGHT
(2) WRIGHT INTERNATIONAL INVESTMENTS LIMITED

Claimants

- and -

(1) PAYWARD, INC.
(2) PAYWARD LTD.
(3) PAYWARD VENTURES, INC

Defendants

Claim No. IL-2022-000069
(the “BTC Core Claim”)

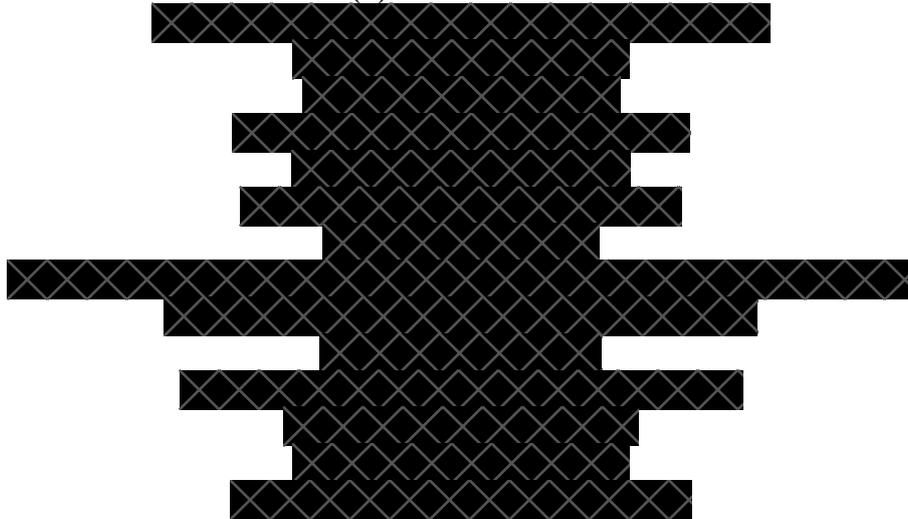
BETWEEN:

- (1) DR CRAIG STEVEN WRIGHT**
- (2) WRIGHT INTERNATIONAL INVESTMENTS LIMITED**
- (3) WRIGHT INTERNATIONAL INVESTMENTS UK LIMITED**

Claimants

- and -

(1) BTC CORE



- (16) BLOCK, INC.**
- (17) SPIRAL BTC, INC.**
- (18) SQUAREUP EUROPE LTD**
- (19) BLOCKSTREAM CORPORATION INC.**
- (20) CHAINCODE LABS, INC**
- (21) COINBASE GLOBA INC.**
- (22) CB PAYMENTS, LTD**
- (23) COINBASE EUROPE LIMITED**
- (24) COINBASE INC.**
- (25) CRYPTO OPEN PATENT ALLIANCE**
- (26) SQUAREUP INTERNATIONAL LIMITED**

Defendants

THIRD WITNESS STATEMENT OF DR CRAIG STEVEN WRIGHT

I, CRAIG STEVEN WRIGHT, of [REDACTED] state as follows:

Introduction

1. I refer to my first and second witness statements dated 28 July 2023 and 9 October 2023.
2. On 2 October 2023, Macfarlanes LLP wrote to my then solicitors, Travers Smith LLP, asking for an explanation in relation to what they referred to as the “pre-trial”. My solicitors, Shoosmiths LLP, interviewed my wife and I and prepared a letter, which was approved by me and sent on 11 October 2023. I understand that the Court has ordered that I should give a witness statement setting out the facts in the letter. Subsequently, Macfarlanes LLP has written to my solicitors asking further questions, which I have also sought to address here. A copy of the above correspondence is at Exhibit CSW1.
3. To prepare this witness statement, my solicitors copied the content of the letter into this witness statement and sent it to me for review. I made some further amendments, and this process was then repeated until the witness statement was complete.
4. I have been asked to confirm the following:

“The purpose of this witness statement is to set out matters of fact of which I have personal knowledge. I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case. This witness statement sets out only my personal knowledge and recollection, in my own words. On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, and if so, how and when. I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.”

I confirm this is correct, although as the court has ordered that I set out the facts in the letter, it is not always in my exact words.

Background

5. In around December 2022, Mr Christen Ager-Hanssen (Christen) was appointed Group Chief Executive Officer of nChain UK Ltd.
6. From January 2023, Christen began taking an active role in the claims I am involved in, and he appointed Zafar Ali KC (Zafar) as a consultant. Acting on my behalf, Christen and Zafar then appointed Travers Smith LLP to take over the conduct of the above claims from Ontier LLP.
7. Subsequent to Zafar's involvement, I became concerned that Zafar was not following my instructions and that I was not being kept informed of the conduct and progress of the claims.
8. Shortly before 21 September 2023, my wife, Ramona Ang, and I were invited by telephone by Christen and Zafar to attend a two-day meeting at an office in London 6-7 Market Place London, W1W 8AF. It was explained to us that the purpose of the meeting was to discuss the strategy in the ongoing litigation.
9. I liaised with my EA, Brigi Gruber, to put this time in my diary. Her correspondence with Ted Loveday (a junior barrister working with Zafar) is at Exhibit CSW2. This has been redacted by my lawyers to remove privileged information.
10. On 21 September 2023, as Ramona and I were going to the meeting, we briefly saw and met Zafar at a coffee shop next to the office. Zafar appeared to be highly agitated and said he could not meet with us, but we would see him the next day.
11. On 22 September 2023, Ramona and I attended the meeting. On arriving at the venue, we were shown to a room which was laid out, in part, like a courtroom. On one side of the room was Zafar, Ted Loveday (a junior barrister working with Zafar), Khrystyna Khanas (a solicitor Christen hired) and Christen. Zafar and Ted were in a wig and gown. Zafar instructed me to sit on the other side of the room. In addition to Ramona, Stefan and Fawn Labrie were in attendance. At each seat was a lever arch file with documents from disclosure. I understand my solicitors have asked Stefan at nChain if nChain has a copy of this, but they do not have one. I wasn't allowed to retain a copy. When asking Stefan for the lever arch, he also provided to my solicitors with a screenshot of a WhatsApp chat and certain photographs, which are in Exhibit CSW3.

12. I was then instructed by Zafar that I would be questioned by him on my evidence; Ted was to be my representative. I would like to emphasise that I was shocked and confused. I had been told that a judge would be present but thought he would be an additional advisor on the claim (in the same way Zafar explained to me he is a judge). I did not know this was going to happen or why it was happening. I recall questioning whether this should be taking place, but I was told by Zafar that he was a King's Counsel and, hence, knew more than me.
13. Zafar then instructed me to stand and bow while a man dressed in the form of a judge's robe entered the room and took a table in the room. I was told that he was a judge, but I have my doubts. I wasn't introduced to him and was not told his name. Zafar then aggressively questioned me, with the questions premised on me not being Satoshi Nakamoto and that I had forged documents in the litigation. I do not recall the specific questions which I was asked or the documents to which I was taken. During the course of the cross-examination, I maintained that I was Satoshi Nakamoto and I did not forge the documents. I think the questioning went on for 90 minutes. After this, the man in the judge's robes explained that he would reserve judgment.
14. Following the meeting, Christen approached Ramona and me. A heated exchange ensued, in which I recall Christen explaining that I would lose the case and that I should admit that I did not create Bitcoin and was not Satoshi Nakamoto. When I refused, I was told that I should amend my evidence and explain that, while I was Satoshi Nakamoto, I had re-created lost documents to be used as evidence. Again, I refused.
15. I also recall that Christen also spoke to Stefan, explaining that if he maintained his witness evidence, he would be liable for perjury. He encouraged Stefan to withdraw or amend his evidence.
16. Following this exchange, Ramona explained to me that Christen spoke to her directly. When speaking with Ramona, Christen adjusted his tone, explaining that only he could help me and offering a lunch with Ramona alone so that a 'deal' could be done. From this, I infer that Christen was referring to him acquiring the shares and/or intellectual property of nChain. Ramona initially entertained this suggestion of a lunch meeting, and a lunch meeting was arranged for the following Wednesday.

17. On 24 September 2023, Christen invited Ramona and I to again attend the office, where a judgment would be handed down. I initially refused, but Christen insisted that I had to come. Again, Zafar and Ted, as well as Stefan Matthews, were in attendance, and the room was laid out as a courtroom. The man dressed as a judge attended and proceeded to read from a script for approximately 20 minutes, giving judgment. In general, the script said that I was a fraud, although I do not recall the specifics. Again, following the meeting, Christen applied pressure on me and Stefan to change our evidence.
18. The following day, 25 September, I was told by Ramona that Christen subsequently contacted her directly. Here, he repeated that I was a fraud and sent her screenshots of my browsing history (which have subsequently been published on social media). Copies of the screenshots he sent her are at Exhibit CSW4. Christen obtained these from my Wright International Investments UK Ltd laptop. He used a policy install attached to software from nChain Ltd to push unauthorised changes to my system. The access to my laptop was reported to nChain and the police. The Surrey police report reference number is 9786/2509. The disclosure provider instructed by my solicitors, KLD, has captured the search history I used.
19. For the avoidance of doubt, I conducted internet searches following the service of COPA's expert report on the authenticity of the electronic documents. They were made to understand and test the allegations made therein. These were necessary and directly associated with responding to the COPA (Madden) forensic report.
20. On 26 September 2023, Ramona declined Christen's invitation for lunch.
21. During the week commencing 25 September 2023, following notification of the unauthorised access to my laptop, nChain commissioned an investigation. Following this preliminary investigation, a board meeting was called. I have been told that Christen was dismissed at this board meeting. I am not privy to the investigation (which is ongoing).
22. Following his dismissal, Christen started to publish on social media partial accounts of that set out above, including said screenshots.

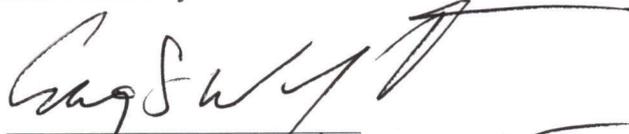
- 23. I have not had contact with Zafar since 24 September 2023. In light of these events, I have decided to restructure my legal team, moving solicitors from Travers Smith LLP to Shoosmiths LLP.

- 24. I would like to emphasise that there is no question that Travers Smith LLP nor the counsel team instructed by it were aware of the above events until after these had occurred and I informed them.

Statement of Truth

I believe 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:



Name:

CRAG WRIGHT

Dated:

19 OCT 23

Certificate of Compliance

I hereby certify that:

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to Dr Craig Wright.
3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signed:	
Name:	Antony Craggs
Position:	Partner
Dated:	19 October 2023

Made on behalf of Defendant in COPA Claim
Made on behalf of Claimants in the Coinbase Claim, the Kraken Claim and the BTC Core Claim
Third Witness Statement Dr Craig Steven Wright
Dated 19 October 2023
Exhibit CSW1

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

Claim No. IL-2021-000019
(the “**COPA Claim**”)
Claim No. IL-2022-000035
(the “**Coinbase Claim**”)
Claim No. IL-2022-000036
(the “**Kraken Claim**”)
Claim No. IL-2022-000069
(the “**BTC Core Claim**”)

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

Claimant

- and -

DR CRAIG STEVEN WRIGHT

Defendant

EXHIBIT CSW1

By Email

Travers Smith
10 Snow Hill
London
EC1A 2AL

MACFARLANES

2 October 2023

Our ref: LEXH/CJJC/CZZA/804851
Your refs: HDL/LEC/AMZF C07239-00001

Dear Travers Smith

Wright & Ors v BTC Core & Ors; Claim No. IL-2022-00069
Wright & Ors v Coinbase Global Inc. & Ors; Claim No. IL-2022-000035
Wright & Ors v Payward Inc. & Ors; Claim No. IL-2022-000036
Crypto Open Patent Alliance v Dr Craig Steven Wright; Claim No. IL-2022-000019

We are writing with regard to the recent posts and statements on X (formerly Twitter) by Christen Ager-Hanssen. In particular, we refer to statements made on a Spaces discussion held early on 1 October 2023 (UK time). A computer generated copy of the transcript is enclosed, and the audio can be found here: [https://nt4tn.net/scammer-craig-wright/What%E2%80%99s%20going%20on%20in%20bsv%20-%20COPA,%20CAH%20and%20signing.%20\[1RDxIleXYQExL\].m4a](https://nt4tn.net/scammer-craig-wright/What%E2%80%99s%20going%20on%20in%20bsv%20-%20COPA,%20CAH%20and%20signing.%20[1RDxIleXYQExL].m4a).

The transcript details, at 01:07:04.000 onwards, a “*pre-trial*” that was held “*last Friday*”. At this “*pre-trial*”, a KC supposedly “*demolished Craig on the forensic evidence and the so-called reliance evidence*”. Mr Ager-Hanssen goes on to say that Dr Wright was “*totally demolished in a cross-examination*”, and that this “*pre-trial*” was conducted to “*test [Dr Wright] out because we didn’t feel confident about his way of answering our questions*”.

Today, Mr Ager-Hanssen made another post on X, supposedly showing “*Stefan Matthew @TurkeyChop with Fawn before the “cross examination” @Dr_CS Wright on his reliance documents*”. It appears that this post has subsequently been deleted:

99242509.1

Macfarlanes LLP 20 Cursitor Street London EC4A 1LT
T +44 (0)20 7831 9222 F +44 (0)20 7831 9607 DX 138 Chancery Lane www.macfarlanes.com

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The word 'partner' is used to refer to a member or consultant of Macfarlanes LLP. A list of members is open for inspection at the above address.



These statements, if true, are incredibly concerning. As you will be aware, rule C9.4 of the Bar Standards Board Handbook explicitly states that counsel should "*not rehearse, practise with or coach a witness in respect of their evidence*". Further, *R v Momodou [2005] EWCA Crim 177* makes it clear that witness coaching (that is preparing a witness for trial by specific reference to evidence) is impermissible, although witness familiarisation (that is general training in what to expect at trial) may be allowed. Witness familiarisation should be conducted by an independent individual with no knowledge of the facts of the case. If Mr Ager-Hanssen's statements are to be believed, Dr Wright's session specifically referred to documents disclosed in these proceedings and, as such, is plainly not witness familiarisation.

Please therefore explain your firm's understanding of Mr Ager-Hanssen's statements. In particular, please explain: i) what coaching Dr Wright has received; ii) when such coaching was received; iii) who conducted any coaching sessions and where these were held; and iv) why it was deemed necessary for Dr Wright to receive such coaching.

We look forward to hearing from you as soon as possible. In the meantime, our clients' rights remain fully reserved.

Yours faithfully

Magoranes LLP

Copy to Harcus Parker Limited, Enyo Law, EIP and Bird & Bird LLP

Encs.

By Email Only (MacsBitcoin@macfarlanes.com)

Macfarlanes LLP
20 Cursitor Street
London
EC4A 1LT

No. 1 Bow Churchyard
London
EC4M 9DQ

DX 36 London

E: COPAvDrWright@Shoosmiths.com

Date 11 October 2023

Your Ref LEXH/CJJC/CZZA/804851

Our Ref AC.HXF.MG.M-01078068; M-01078080; M-01078081; M-01078082

Dear Macfarlanes LLP

Claim No. IL-2022-000019: Crypto Open Patent Alliance v Dr Craig Steven Wright

Claim No. IL-2022-000035: Wright & Ors v Coinbase Global Inc. & Ors

Claim No. IL-2022-000036: Wright & Ors v Payward Inc. & Ors

Claim No. IL-2022-000069: Wright & Ors v BTC Core & Ors

We refer to your letters dated 2 and 6 October 2023 and Travers Smith LLP's letter dated 4 October 2023 regarding recent posts and statements on X (formerly Twitter) by Christen Ager-Hanssen.

Our client's instructions are as follows:

1. In around December 2022 Mr Ager-Hanssen was appointed Group Chief Executive Officer of nChain UK Ltd.
2. From January 2023, Mr Ager-Hanssen began taking an active role in the claims in which our client is involved and he appointed Zafar Ali KC as a consultant. Mr Ager-Hanssen and Mr Ali then appointed (on our client's behalf) Travers Smith LLP to take over conduct of the above claims from Ontier LLP.
3. Subsequent to Mr Ali's involvement, our client became concerned that Mr Ali was not following our client's instructions and that he was not being kept informed of conduct and progress of the claims.
4. Shortly before 21 September 2023, our client and his wife were invited to attend a two-day meeting at an office in London with Mr Ager-Hanssen and Mr Ali. It was explained to them that the purpose of the meeting was to discuss the strategy in the ongoing litigation.
5. On 21 September 2023, as our client and his wife were going to the meeting, they bumped into Mr Ali at a coffee shop next to the office. Mr Ali appeared to our client to be highly agitated. Mr Ali said he could not meet with our client and his wife, but would see them the next day.
6. On 22 September 2023, our client and his wife attended the meeting. On arriving at the venue, they were shown to a room which was laid out, in part, like a court room. On one side of the room, was Mr Ali and others. Mr Ali was in wig and gown. Mr Ali instructed our client to sit on the other side of the room. In addition to our client's wife, at least Mr Stefan Matthews and Ms Fawn Labrie were in attendance. At each seat was a leaver arch file with documents from disclosure.
7. Our client was then instructed by Mr Ali that he would then be questioned by him on his evidence. Our client would like to emphasise that he was shocked and confused. He did not know this was going to happen or why it was happening. Our client recalls questioning whether this should be

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Certificate No. FS 31466

taking place, but was told by Mr Ali that he was a King's Counsel and hence knew more than our client.

8. Mr Ali then instructed our client to stand and bow while a man dressed in a form of judge's robes entered the room and took a table in the room. He was then questioned by Mr Ali in an aggressive manner with the questions premised on him not being Satoshi Nakamoto and that he had forged documents in the litigation. Our client does not recall the specific questions which he was asked or the documents to which he was taken. During the course of the cross-examination, our client maintained that he was Satoshi Nakamoto and did not forge the documents. The questioning went on for 90 minutes. After this the man in judge's robes explained that he would reserve judgment.
9. Following the meeting, Mr Ager-Hanssen approached our client and his wife. A heated exchange ensued, in which our client recalls Mr Ager-Hanssen explaining that he would lose the case and that he should admit that he was not Satoshi Nakamoto. When our client refused, he was told that he should amend his evidence and explain that, while he was Satoshi Nakamoto, he had re-created lost documents to be used as evidence. Again, our client refused.
10. Our client also recalls Mr Ager-Hanssen also spoke to Mr Matthews, explaining that if he maintained his witness evidence, he would be liable for perjury. He encouraged Mr Matthews to withdraw or amend his evidence.
11. Following this exchange, our client's wife explains that Mr Ager-Hanssen spoke to her directly. He adjusted his tone, explaining that only he could help our client and offered a lunch with our client's wife alone so that a 'deal' could be done. From this, our client infers that Mr Ager-Hanssen was referring to him acquiring the shares and/or intellectual property of nChain UK Ltd. This suggestion was initially entertained, with a lunch arranged for the following Wednesday.
12. On 24 September 2023, Mr Ager-Hanssen invited our client and his wife to again attend the office, where a judgment would be handed-down. Our client initially refused, but Mr Ager-Hanssen insisted that he had to come. Again, Mr Ali was in attendance and the room was laid out as a court room. The man dressed as a judge attended and proceeded to read from a script for approximately 20 minutes, giving judgment. In general, the script said that our client was a fraud, although our client does not recall the specifics. Again, following the meeting Mr Ager-Hanssen applied pressure on our client and Mr Matthews to change their evidence.
13. Mr Ager-Hanssen subsequently contacted our client's wife. Here, he repeated that our client was a fraud and sent screenshots of our client's browsing history (which have subsequently been published on social media). By means which are yet to be confirmed, we understand that Mr Ager-Hanssen obtained these from our client's personal laptop. The access to our client's laptop was reported to nChain UK Ltd and the police.
14. For the avoidance of doubt, our client explains that his internet searches were conducted by him following service of your client's expert report on the authenticity of the electronic documents. They were made to understand and test the allegations made therein. We are in the process of obtaining copies of the search history materials to which Mr Ager-Hanssen refers. On 26 September 2023, Mr Ager-Hanssen's invitation for lunch was declined.
15. During the week commencing 25 September 2023, following notification of the apparent access to our client's laptop, nChain UK Ltd commissioned an investigation. Following this preliminary investigation, a board meeting was called. Our client has been told that Mr Ager-Hanssen was dismissed at this board meeting. Our client is not privy to the investigation (which is ongoing).
16. Following his dismissal, Mr Ager-Hanssen started to publish on social media partial accounts of that set out above, including said screenshots.

17. Our client has not had contact with Mr Ali since 24 September 2023. In light of events, our client decided to restructure his legal team, moving solicitors from Travers Smith LLP to our firm.
18. Our client would like to emphasise that there is no question that Travers Smith LLP nor the counsel team instructed by it were aware of the above events.

Yours faithfully

A handwritten signature in black ink that reads "Shoosmiths LLP". The signature is written in a cursive, flowing style.

Shoosmiths LLP

Copy to Marcus Parker Limited, Enyo Law, EIP and Bird & Bird LLP

By Email

Shoosmiths LLP
No. 1 Bow Churchyard
London
EC4M 9DQ

MACFARLANES

13 October 2023

Our ref: LEXH/CJJC/CZZA/804851
Your refs: AC.HXF.M-01078068
AC.HXF.M-01078080

Third Letter

Dear Shoosmiths

Wright & Ors v BTC Core & Ors; Claim No. IL-2022-00069
Wright & Ors v Coinbase Global Inc. & Ors; Claim No. IL-2022-000035
Wright & Ors v Payward Inc. & Ors; Claim No. IL-2022-000036
Crypto Open Patent Alliance v Dr Craig Steven Wright; Claim No. IL-2022-000019

We refer to your letter dated 11 October 2023, detailing a mock-trial involving your client, Dr Wright, as well as previous correspondence in relation to this issue.

The events described in your letter are concerning. On any view, they are wholly inconsistent with the approach to witnesses required by Practice Direction 57AC and represent a serious interference with the trial process. If accurate, they also constitute a serious failure by Mr Zafar Ali KC to comply with the Bar Council's guidance on witness preparation. Paragraph 28.4.3 of the enclosed Bar Council guidance clearly prohibits mock-trials of the type described in your letter.

As you will be aware, barristers are bound by the Code of Conduct detailed in the BSB Handbook. rC66 of that Code of Conduct requires barristers to report to the Bar Standards Board if they have reasonable grounds to believe that there has been serious misconduct by a barrister. The events described in your letter clearly allege serious misconduct by a barrister. In light of this, please confirm whether Mr Ali's conduct has been referred to the BSB by Dr Wright's present or former counsel team and provide a copy of any such report, as well as its reference number (if one was provided).

Your letter also refers to a number of documents. To enable a full investigation of this matter, including whether our client's counsel team have a need to comply with their own reporting obligations, please provide copies of the following:

- 1 the invitation to the two-day meeting, referenced in paragraph 4;
- 2 the lever arch file of documents, referenced in paragraph 6;
- 3 the scripted judgment, referenced in paragraph 12;

99427373.2

Macfarlanes LLP 20 Cursitor Street London EC4A 1LT
T +44 (0)20 7831 9222 F +44 (0)20 7831 9607 DX 138 Chancery Lane www.macfarlanes.com

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- 4 the contact by Mr Ager-Hanssen, including the screenshots, referenced in paragraph 13;
- 5 the relevant browser history, referenced in paragraph 13;
- 6 the report to nChain UK Ltd, referenced in paragraph 13; and
- 7 the report made to the police, referenced in paragraph 13.

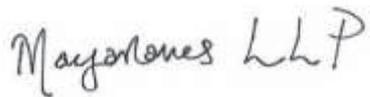
Please also confirm the identity (or, if not possible, a description) of the person who purported to be a “judge” in this mock-trial exercise. If your client claims not to know his identity, please confirm. Please also provide a copy of any recording or transcript of the relevant events. Similarly, please provide further details as to the location of this mock-trial, as well as who else was in attendance – we note that your letter provided little detail in this regard.

It is evident that the documents referred to above are likely also to have a bearing on the Identity Issue and therefore ought be disclosed in these proceedings. Please confirm by return that such disclosure will be provided immediately.

We note that at yesterday’s hearing Mellor J ordered that your client provide a witness statement on this matter. To note, we do not see how any such statement precludes you from answering our questions above or providing the documents sought as a matter of urgency.

We look forward to hearing from you as soon as possible. In the meantime, our clients’ rights remain fully reserved, including in relation to bringing this matter before the Court.

Yours faithfully



Copy to Harcus Parker Limited, Enyo Law, EIP and Bird & Bird LLP

Encs.

Made on behalf of Defendant in COPA Claim
Made on behalf of Claimants in the Coinbase Claim, the Kraken Claim and the BTC Core Claim
Third Witness Statement Dr Craig Steven Wright
Dated 19 October 2023
Exhibit CSW2

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

Claim No. IL-2021-000019
(the "**COPA Claim**")
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Claim No. IL-2022-000069
(the "**BTC Core Claim**")

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

Claimant

- and -

DR CRAIG STEVEN WRIGHT

Defendant

EXHIBIT CSW2

From: [Ted Loveday](#)
To: [Brigi Gruber](#)
Cc: [Sophia Salim](#); [craig@rcjbr.org](#); [ramona@rcjbr.org](#); [zafar@custosgroup.com](#); [khrystyna@custosgroup.com](#)
Subject: RE: Meetings next week
Date: 19 September 2023 13:14:56
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image021.png](#)

Hi Brigi

Zafar has asked me to pass on the following:

[REDACTED]

[REDACTED]

Friday 11am – 6pm, 7-8 Market Place: Craig and Ramona should attend 7-8 Market Place from 11am and may be required to stay until 6pm. As you may be aware, I have managed to secure the assistance of a full-time judge who has set aside the day. The exercise will be of great value to all concerned.

Best wishes

Ted

From: Brigi Gruber <b.gruber@nchain.com>
Sent: 19 September 2023 10:15
To: Ted Loveday <TLoveday@maitlandchambers.com>
Cc: Sophia Salim <s.salim@nchain.com>
Subject: RE: Meetings next week

Good morning Ted

Could you please let me know the location of the Thursday and the Friday meetings?
My colleague, Sophia will be arranging a car for Craig and need the information for the booking.

Thank you in advance.

Kind regards

Brigi

From: Brigi Gruber <b.gruber@nchain.com>
Sent: Monday, September 18, 2023 3:12 PM
To: Ted Loveday <TLoveday@maitlandchambers.com>

Cc: Sophia Salim <s.salim@nchain.com>

Subject: RE: Meetings next week

Many thanks Ted.

Just to double check , the Friday meeting is at 7-8 Market place and not 30 Market Place / the nChain office, is that correct?

Kind regards

Brigi

From: Ted Loveday <TLoveday@maitlandchambers.com>

Sent: Monday, September 18, 2023 12:37 PM

To: Brigi Gruber <b.gruber@nchain.com>

Cc: Sophia Salim <s.salim@nchain.com>

Subject: RE: Meetings next week

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Hi Brigi

Thursday:

hold 11am – 4.30pm.

For now could you please

Friday: 12 noon – 6pm at Market Place please.

Best wishes

Ted

From: Brigi Gruber <b.gruber@nchain.com>

Sent: 18 September 2023 12:30

To: Ted Loveday <TLoveday@maitlandchambers.com>; Knight, Tim <Tim.Knight@traverssmith.com>

Cc: Sophia Salim <s.salim@nchain.com>

Subject: RE: Meetings next week

Hello Ted

I hope you had a nice weekend.

Could you please let me know if you know the times and the location of the meetings on Thursday and Friday?

Kind regards

Brigi

From: Brigi Gruber <b.gruber@nchain.com>
Sent: Friday, September 15, 2023 10:07 AM
To: Ted Loveday <TLoveday@maitlandchambers.com>; Knight, Tim <Tim.Knight@traverssmith.com>
Cc: Sophia Salim <s.salim@nchain.com>
Subject: RE: Meetings next week

Hi Ted

Thursday yes but I need to check with re Friday with him as there is something already in his calendar at 12.00-14.00.

Kind regards

Brigi

From: Ted Loveday <TLoveday@maitlandchambers.com>
Sent: Friday, September 15, 2023 9:50 AM
To: Brigi Gruber <b.gruber@nchain.com>; Knight, Tim <Tim.Knight@traverssmith.com>
Cc: Sophia Salim <s.salim@nchain.com>
Subject: Re: Meetings next week

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I will check but I think he is meant to be meeting Zafar all day Thursday and Friday. Is that OK?

Ted Loveday

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From: Brigi Gruber <b.gruber@nchain.com>
Sent: 15 September 2023 08:38
To: Knight, Tim <Tim.Knight@traverssmith.com>; Ted Loveday

<TLoveday@maitlandchambers.com>

Cc: Sophia Salim <s.salim@nchain.com>

Subject: Meetings next week

Good morning both

Craig asked me to block off next Wednesday and Thursday.

I am assuming these are for the legal meetings as I do not know of any meetings in the office.

If you know any details of the meetings next week, could you please share with me?

Many thanks and have a lovely weekend!

Kind regards

Brigi

Brigi Gruber

Executive Assistant

b.gruber@nchain.com

+44 7841 054150

30 Market Place, London, W1W 8AP, United Kingdom

nChain_Logo.png



Banner_LexisNexis_2023.png



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Made on behalf of Defendant in COPA Claim
Made on behalf of Claimants in the Coinbase Claim, the Kraken Claim and the BTC Core Claim
Third Witness Statement Dr Craig Steven Wright
Dated 19 October 2023
Exhibit CSW3

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

Claim No. IL-2021-000019
(the "**COPA Claim**")
Claim No. IL-2022-000035
(the "**Coinbase Claim**")
Claim No. IL-2022-000036
(the "**Kraken Claim**")
Claim No. IL-2022-000069
(the "**BTC Core Claim**")

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

Claimant

- and -

DR CRAIG STEVEN WRIGHT

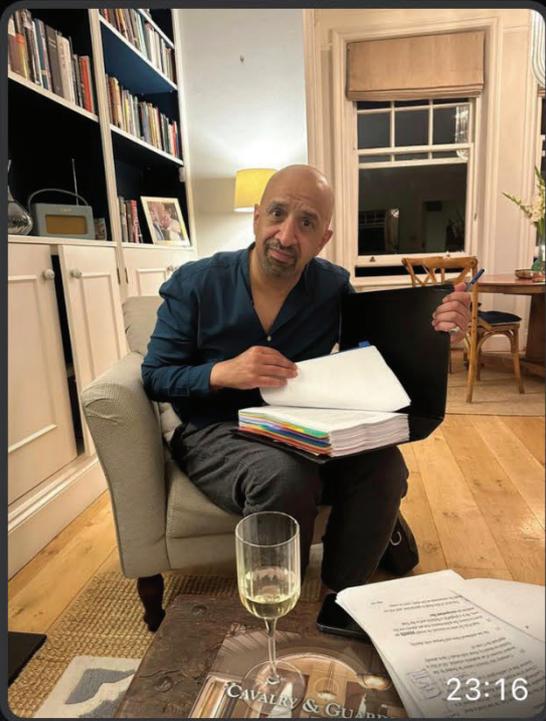
Defendant

EXHIBIT CSW3

20:41



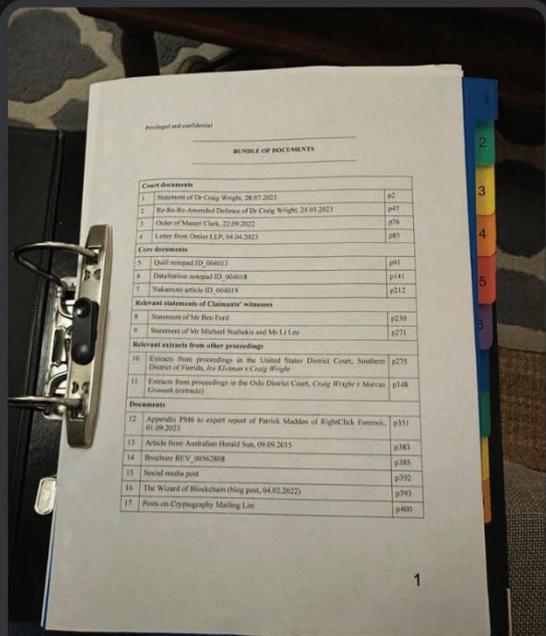
Christen Ager-Hansson



23:16

Preparing for Friday

23:17



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BUNDLE OF DOCUMENTS

Court documents	
1	Statement of Dr Craig Wright, 28.07.2023 p2
2	Bar-By-File Amended Defense of Dr Craig Wright, 24.03.2023 p47
3	Order of Master Clark, 22.09.2022 p76
4	Letter from Ombir LLP, 04.04.2023 p85
Core documents	
5	Quill notepad ID_064013 p91
6	DataStation notepad ID_954018 p141
7	Insulation report ID_904019 p212
Relevant statements of Claimants' witnesses	
8	Statement of Mr Ben Ford p230
9	Statement of Mr Michael Stathakis and Ms Li Lei p271
Relevant extracts from other proceedings	
10	Extracts from proceedings in the United States District Court, Southern District of Florida, <i>Re Roman v Craig Wright</i> p275
11	Extracts from proceedings in the Ohio District Court, <i>Craig Wright v Marcus Eronowit (extracts)</i> p348
Documents	
12	Appendix PM6 to expert report of Patrick Madden of EightClick Forensic, 01.09.2023 p351
13	Article from Australian Herald Sun, 09.09.2015 p383
14	Brochure BEV_00562808 p385
15	Social media post p392
16	The Wizard of Blockchain (blog post, 04.02.2022) p393
17	Posts on Cryptography Mailing List p400

1













Made on behalf of Defendant in COPA Claim
Made on behalf of Claimants in the Coinbase Claim, the Kraken Claim and the BTC Core Claim
Third Witness Statement Dr Craig Steven Wright
Dated 19 October 2023
Exhibit CSW4

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

Claim No. IL-2021-000019
(the “**COPA Claim**”)
Claim No. IL-2022-000035
(the “**Coinbase Claim**”)
Claim No. IL-2022-000036
(the “**Kraken Claim**”)
Claim No. IL-2022-000069
(the “**BTC Core Claim**”)

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

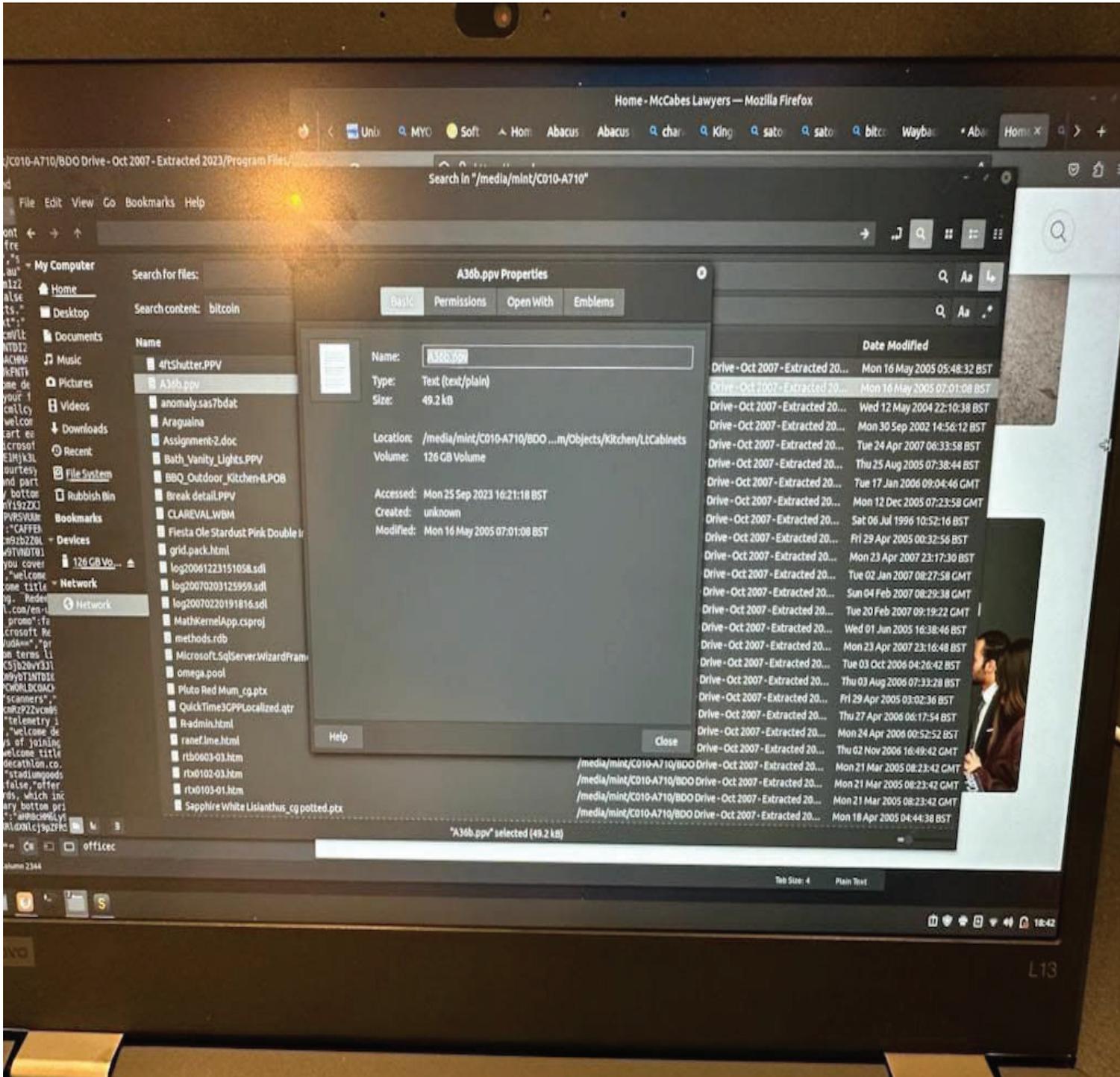
Claimant

- and -

DR CRAIG STEVEN WRIGHT

Defendant

EXHIBIT CSW4



File Edit View Go Bookmarks Help

Search for files:

Search content: bitcoin

Name

- 4ftShutter.PPV
- A36b.ppv
- anomaly.sas7bdot
- Arapaina
- Assignment-2.doc
- Bath_Vanity_Lights.PPV
- BBQ_Outdoor_Kitchen-8.POB
- Break detail.PPV
- CLAREVAL.WBM
- Fiesta Ole Stardust Pink Double I
- grid.pack.html
- log20061223151058.sdl
- log20070203125959.sdl
- log20070220191816.sdl
- MathKernelApp.csproj
- methods.rob
- Microsoft.SqlServerWizardFram
- omega.pool
- Pluto Red Mum_cg.ptx
- QuickTime3CPPLocalized.qtr
- R-admin.html
- ranefline.html
- rtb0603-03.htm
- rtb0102-03.htm
- rtb0103-01.htm
- Sapphire White Uslanthus_cg.potted.ptx

A36b.ppv Properties

Basic Permissions Open With Emblems

Name:

Type: Text (text/plain)

Size: 49.2 kB

Location: /media/mint/C010-A710/BDO...m/Objects/Kitchen/LtCabinets

Volume: 126 GB Volume

Accessed: Mon 25 Sep 2023 16:21:18 BST

Created: unknown

Modified: Mon 16 May 2005 07:01:08 BST

Help Close

Date Modified	
Drive - Oct 2007 - Extracted 20...	Mon 16 May 2005 05:48:32 BST
Drive - Oct 2007 - Extracted 20...	Mon 16 May 2005 07:01:08 BST
Drive - Oct 2007 - Extracted 20...	Wed 12 May 2004 22:10:38 BST
Drive - Oct 2007 - Extracted 20...	Mon 30 Sep 2002 14:56:12 BST
Drive - Oct 2007 - Extracted 20...	Tue 24 Apr 2007 06:33:58 BST
Drive - Oct 2007 - Extracted 20...	Thu 25 Aug 2005 07:38:44 BST
Drive - Oct 2007 - Extracted 20...	Tue 17 Jan 2006 09:04:46 GMT
Drive - Oct 2007 - Extracted 20...	Mon 12 Dec 2005 07:23:58 GMT
Drive - Oct 2007 - Extracted 20...	Sat 06 Jul 1996 10:52:16 BST
Drive - Oct 2007 - Extracted 20...	Fri 29 Apr 2005 00:32:56 BST
Drive - Oct 2007 - Extracted 20...	Mon 23 Apr 2007 23:17:30 BST
Drive - Oct 2007 - Extracted 20...	Tue 02 Jan 2007 08:27:58 GMT
Drive - Oct 2007 - Extracted 20...	Sun 04 Feb 2007 08:29:38 GMT
Drive - Oct 2007 - Extracted 20...	Tue 20 Feb 2007 09:19:22 GMT
Drive - Oct 2007 - Extracted 20...	Wed 01 Jun 2005 16:38:46 BST
Drive - Oct 2007 - Extracted 20...	Mon 23 Apr 2007 23:16:48 BST
Drive - Oct 2007 - Extracted 20...	Tue 03 Oct 2006 04:26:42 BST
Drive - Oct 2007 - Extracted 20...	Thu 03 Aug 2006 07:33:28 BST
Drive - Oct 2007 - Extracted 20...	Fri 29 Apr 2005 03:02:36 BST
Drive - Oct 2007 - Extracted 20...	Thu 27 Apr 2006 06:17:54 BST
Drive - Oct 2007 - Extracted 20...	Mon 24 Apr 2006 00:52:52 BST
Drive - Oct 2007 - Extracted 20...	Thu 02 Nov 2006 16:49:42 GMT
/media/mint/C010-A710/BDO Drive - Oct 2007 - Extracted 20...	Mon 21 Mar 2005 08:23:42 GMT
/media/mint/C010-A710/BDO Drive - Oct 2007 - Extracted 20...	Mon 21 Mar 2005 08:23:42 GMT
/media/mint/C010-A710/BDO Drive - Oct 2007 - Extracted 20...	Mon 21 Mar 2005 08:23:42 GMT
/media/mint/C010-A710/BDO Drive - Oct 2007 - Extracted 20...	Mon 18 Apr 2005 04:44:38 BST

officec

Tab Size: 4 Plain Text

18:42

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