

APPENDIX 3 TO DR WRIGHT’S SKELETON ARGUMENT

Table of Dr Wright’s Responses to COPA’s 20 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 Wright 11 and Appendix B thereto)
1	ID_000073 Statistics assessment homework {L1/323}}	Page 6	PM38 {H/145}	<p align="center"><i>Appendix B [4]</i></p> <ol style="list-style-type: none"> 1. <u>General points:</u> <ol style="list-style-type: none"> 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. 2. <u>Relationship with ID-000077:</u> <ol style="list-style-type: none"> 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. b. Dr Wright explains that the different authors for the two documents reflect his IT infrastructure and his use of virtual machines.

				<p>c. Dr Wright believes that common embedded content reflects a common ancestor to both documents.</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.</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>
2	<p><u>ID_000217</u> LLM Dissertation proposal 2 (Reliance) {L2/131}</p>	Page 11	PM25 {H/118}	<p><i>Appendix B [5]</i></p> <p>1. <u>Grammarly tags, fonts, Microsoft schema:</u> Dr Wright has explained in Appendix A of Wright 9 that 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.</p> <p>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.</p> <p>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</p>

				<p>January 2020, as part of his preparation for the Kleiman Litigation and to check whether she could provide further information on them.</p> <p>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).</p>
3	<p><u>ID_000227</u> Economics of Bitcoin nodes (Reliance) {L3/219}</p>	Page 14	PM26 {H/121}	<p><i>Appendix B [6]</i></p> <p>1. <u>MathType software and Microsoft Schema</u>: see row 2 above.</p> <p>2. <u>URL reference and other content not visible in normal use</u>:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>4. <u>Edit time</u>: as explained in row 2 above, criticisms of long edit times overlook the persistence feature of virtual machines.</p>

				5. <u>Email to Lynn Wright</u> : see row 2 above.
4	<u>ID_000254</u> Timecoin- ODT (Reliance) {L2/441}	Page 16	PM2 {H/17}	<p><i>Appendix B [7]</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. 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. 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.
5	<u>ID_000258</u> Economic Security	Page 18	PM29 {H/126}	<i>Appendix B [8]</i>

	(Reliance) {L3/286}			<ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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. b. It is likely that Lynn Wright, who edited some of Dr Wright’s work, removed such “rants” from this document. c. Inconsistencies in the capitalisation of Bitcoin reflect the developmental stage of the concept at the time. 2. <u>Editing Times</u>: see row 2 above. 3. <u>Email to Lynn Wright of 18 January 2020</u>: see Row 2 above.
6	<u>ID_000260</u> OpenOffice 2.4 document (Reliance) {L2/294}	Page 20	PM23 {H/107}	<p><i>Appendix B [9]</i></p> <ol style="list-style-type: none"> 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. 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

				<p>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 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.</p>
7	<p><u>ID_000367</u> Block diffusion within Bitcoin (Reliance) {L3/185}</p>	Page 21	PM30 {H/129}	<p><i>Appendix B [10]</i></p> <p>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 his belief 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.</p> <p>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.</p> <p>3. <u>Edit time</u>: see row 2 above.</p> <p>4. <u>Email to Lynn Wright</u>: see row 2 above.</p>

8.	<u>ID_000396</u> Non-cooperative finite games (Reliance) {L3/203}	Page 27	PM27 {H/122}	<i>Appendix B [11]</i> <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}	<i>Appendix B [12]</i> <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. 4. Dr Wright has explained that this document was disclosed by Ira Kleiman during the Kleiman litigation.

				<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, which is associated with India and the USA. He has identified what he believes to be various other indicators of inauthenticity.</p>
10	<p><u>ID_000536</u> Backdated White Paper {L2/474}</p>	Page 37	PM3 {H/20}	<p><i>Appendix B [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 each case such code included him manually setting the creation date metadata. 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. 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. 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.

11	<u>ID_000550</u> Bitcoin SEIR-C (Reliance) {L3/237}	Page 46	PM1 {H/1}	<p><i>Appendix B [14]</i></p> <ol style="list-style-type: none"> 1. <u>Grammarly, MathType, Microsoft schemas and edit times:</u> <ol style="list-style-type: none"> 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. b. As to the 70-day edit time, see row 2 above. 2. <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.
12	<u>ID_000554</u> Converted Code2Flow flowchart (Reliance) {L3/326}	Page 50	PM10 {H/63}	<p><i>Appendix B [15]</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.

13	<u>ID_000739</u> Bitcoin.exe – hex edited {L3/474}	Page 56	PM12 {H/68}	<i>Appendix B [16]</i> 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 disclosed by other parties in the Kleiman litigation.
14	<u>ID_001379</u> Project BlackNet paper (Reliance) {L1/79}	Page 64	PM8 {H/60}	<i>Appendix B [17]</i> 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 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}	<i>Appendix B [18]</i> 1. Dr Wright does not claim to have sent this email and has explained that it was not sent from his computer or mailbox. It was disclosed by Ira Kleiman 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> <ol style="list-style-type: none"> 1. This e-mail is not a Reliance Document. 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. 2. 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 as evidence in the Kleiman Litigation.
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></p> <ol style="list-style-type: none"> 1. Dr Wright has explained that: <ol 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;

				<p>b. it was scanned in September 2019 by Ontier; and</p> <p>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.</p>
18	<p><u>ID_004013</u> Handwritten BDO minutes (Reliance) {L2/159}</p>	Page 91	PM5 {H/31}	<p><i>Appendix B [21]</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. Dr Wright has disclosed an email from him to Alan Granger from 17 August 2007, indicating that the two did meet on that date.
19	<p><u>ID_004019</u> JSTOR Article – Tominaga Nakamoto (Reliance) {L2/245}</p>	Page 93	PM6 {H/40}	<p><i>Appendix B [22]</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.

20	<u>ID 004077</u> MYOB Accounting records {L5/150}	Page 95	PM7 {H/47}	<p><i>Appendix B [23]</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 documents 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: Wright 11 [41]-[53]. b. 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. 2. As to COPA’s criticisms of the MYOB accounting records, Dr Wright has explained that: <ol style="list-style-type: none"> a. The monetary value assigned by Dr Wright to bitcoin in the accounts reflected what he considered bitcoin to be worth at the time (Wright 11, Appendix B [23.6]) b. The MYOB software used by Dr Wright has been updated on several occasions over the years, which he believes would have updated both the schemas and formatting of content (Wright 11 [298]-[312]).
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