

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

WITNESS STATEMENT OF
JOHN HUDSON

I, **John Hudson**, of [REDACTED], will say as follows:

1. I am a type designer at Tiro Typeworks, a Canadian company founded in 1994. Since 1997 I have specialised in the design and development of custom fonts for multilingual computing.
2. This written statement has been prepared by Bird & Bird to record my own evidence and answers given to Bird & Bird orally and in writing, though I am informed by Bird & Bird that our exchanges are privileged. The evidence given in this statement is written in my own words as far as practicable. The facts and matters set out in this statement are within my own knowledge unless otherwise stated. Where I refer to facts within my own knowledge, I believe them to be true. Where I refer to information from other sources, those facts and matters are true to the best of my knowledge and belief, and I have identified my sources. 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.
3. I am lead designer of the font Nirmala UI, in collaboration with Fiona Ross. From my own memory I remember that we were first enlisted by Microsoft to design it during a discussion in 2010, and after that worked on the font in 2011 and 2012.
4. I then looked through my archives, and can confirm the following major events in the Nirmala UI development timeline. This is likely a lot more detail than necessary, but I found it helpful to put some specific dates to my memories:
 - a. I was initially contacted by Ali Basit, a project manager in the typography group at Microsoft, in the **Spring of 2010** regarding the possibility of creating new user interface fonts for Indian languages to replace the ad hoc mix of various fonts then being used. We discussed the technical issues and stylistic inconsistencies of the

current fonts, and asked if we could design and make fonts that a) would fit within the technical requirements of the Windows and Office user interface and b) conform to Microsoft's typographic branding style as established by the Segoe UI font family.

- b. On **11 May 2010**, I proposed a timeline and pricing for development of new Indic UI fonts for several scripts and languages. I am missing some emails from around that time, but have been able to check the price quote and discussions with Fiona and Ali regarding initial research on the project, including access to Microsoft's translations of Windows user interface text strings into Hindi and other languages, which Fiona and I analysed in preliminary planning of the glyph coverage of the fonts.
 - c. On **27 May 2010** I provided Fiona with an initial draft glyph set spreadsheet: this would be the first stage of our development of the fonts, prior to any glyph drawing or other design work.
 - d. On **7 June 2010** Ali confirmed the budget and agreed to the project, with the start date scheduled for **1 July 2010**.
 - e. I believe Fiona suggested the typeface name 'Nirmala' on **10 July 2010**, and I have confirmed that date by checking with Fiona that this is also to the best of her knowledge the first time that the name Nirmala was suggested.
 - f. Fiona and I put together an international team of designers to work on the various script subsets for the fonts. The first milestone — 'Initial design showing, both weights, all scripts (selection of vowel, consonant and vowel sign glyphs, shown alongside Segoe and each other'—was **15 September 2010**. That would have been the first time anyone outside of the design team would have seen it.
 - g. After the milestone 1 delivery in September 2010, Ali asked us to expand the list of target scripts and languages, leading to an increased scope of work and a final milestone delivery of completed fonts to Microsoft for **30 March 2012**.
5. During the late **Spring and Summer of 2012** we were engaged in bug fixes in the fonts. The first public release of the fonts was in Windows 8 (August–October 2012). Beta versions of the fonts may have been available to developers outside Microsoft before that time, but certainly not before March 2012 and likely not until sometime during that summer.
 6. In **September 2012**, Ali asked me to provide pricing for an additional Semilight weight of the typeface, which was subsequently developed between **13 November 2012** and **13 March 2013**.


List of documents referred to: I have referred to the following documents in the course of preparing this statement: Emails between me, Fiona Ross and Ali Basit; and contracts and purchase orders between us and Microsoft recording the work to be done on the project.

Declaration

I understand that 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, 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 believe the facts stated in this 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: 

Date: 12 July 2023