

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 :

CRYPTO OPEN PATENT ALLIANCE

Claimant

-and-

DR CRAIG STEVEN WRIGHT

Defendant

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WITNESS STATEMENT OF  
JOOST ANDRAE

I, **Joost Andrae**, of [REDACTED], will say as follows:

{C00002539}

1. I am a software engineer and open source contributor. I was a contributor to the OpenOffice.org project in 2008 and was responsible for uploading and releasing OpenOffice.org software, which is an open-source suite of applications with similar functions to the closed-source Microsoft Office. Bird & Bird asked me about the release dates and build numbers for some OpenOffice.org 2.4.0. for the purpose of a dispute in England. I investigated the question and checked the answers against the records from the time, which are still available online. I reported my findings in a letter which is at **Exhibit JA1**. That was typed by Bird & Bird to record my own answers and uses my own words. I believe it is true.
2. This written statement has prepared by Bird & Bird to record my evidence in my own words. I understand from Bird & Bird that my exchanges with them are subject to privilege, and nothing I say in this statement is intended to waive any such privilege. 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. Bird & Bird has pointed out the declaration at the bottom of this statement to me and asked me in particular to bear in mind that 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.

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:** June 28<sup>th</sup> 2023 .....