



IN THE HIGH COURT OF JUSTICE

CLAIM NO. IL-2022-000069

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

INTELLECTUAL PROPERTY LIST (CHD)

MR JUSTICE MELLOR

IL-2022-000069

12TH APRIL 2024

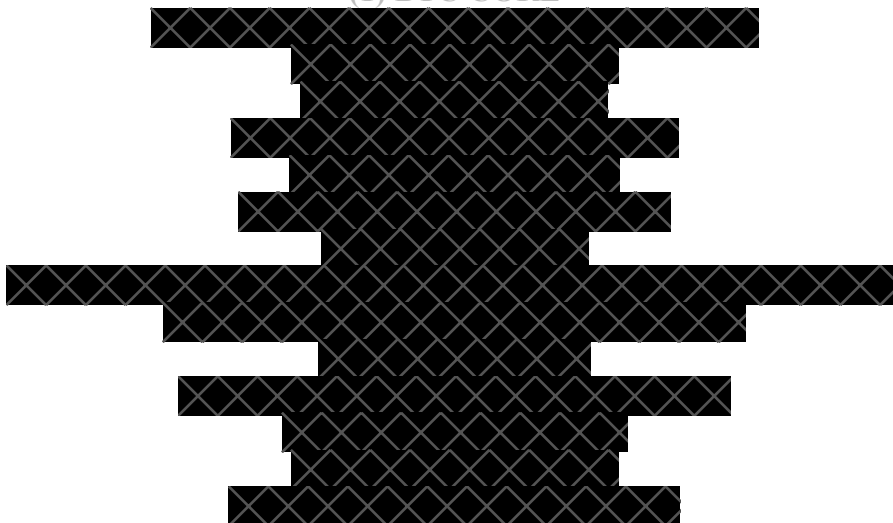
BETWEEN

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

Claimants / Respondents

—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 / Applicants

WORLDWIDE FREEZING ORDER

PENAL NOTICE

IF YOU CRAIG STEVEN WRIGHT DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

IF YOU WRIGHT INTERNATIONAL INVESTMENTS LIMITED DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE FINED OR HAVE YOUR ASSETS SEIZED.

IF YOU WRIGHT INTERNATIONAL INVESTMENTS UK LIMITED DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOW OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE RESPONDENTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

THIS ORDER





1. This is a Freezing Injunction made against Dr Craig Wright, Wright International Investments Limited and Wright International Investments UK Limited (“**the Respondents**”) by Mr Justice Mellor on the application of the Second to Twelfth, Fourteenth and Fifteenth Defendants (“**the Developers**” or “**the Applicants**”). The Judge read the Affidavit listed in Schedule A and accepted the undertakings set out in Schedule B at the end of this Order.
2. This order was made at a hearing on short notice to the Respondents, being the Return Date of a Worldwide Freezing Order made by Mellor J on 27 March 2024, and the Respondents have a right to apply to the Court to vary or discharge the order— see paragraph 15 below.
3. There will be a further hearing in respect of this order on 26 April 2024 (“**the Return Date**”).
4. As there is more than one Respondent: -
 - a. unless otherwise stated, references in this order to “the Respondent” mean both or all of them; and
 - b. this order is effective against any Respondent on whom it is served or who is given notice of it.

FREEZING INJUNCTION

5. Until the Return Date or further order of the Court:-
 - a. Each respective Respondent must not remove from England and Wales any of their assets which are in England and Wales up to the value of £1,089,000 and
 - b. Each respective Respondent must not in any way dispose of, deal with or diminish the value of any of their assets whether they are in or outside England and Wales up to the same value.
6. Paragraph 5 applies to all the Respondents’ assets whether or not they are in their own name, whether they are solely or jointly owned and whether the Respondents or any of them are interested in them legally, beneficially or otherwise. For the purpose of this order the Respondents’ assets include any asset which they have the power, directly or indirectly, to dispose of or deal with as if it were his own. The Respondents are to be regarded as having such power if a third party holds or controls the asset in accordance with the Respondents direct or indirect instructions. For the avoidance of doubt, and without limitation, the term asset shall include any chose in action and any digital

currency or digital asset (including but not limited to BTC (Bitcoin), BSV (Bitcoin Satoshi Vision) and ETH (Ethereum)).

7. This prohibition includes but is not limited to the following assets in particular –

- (1) an interest under any trust, foundation or similar entity including any interest which can arise by virtue of the exercise of any power of appointment, discretion or otherwise howsoever.
- (2) any money standing to the credit of any bank account including the amount of any cheque drawn on such account which has not been cleared.
- (3) the following assets of Respondents in particular:
 - a. Any money held in the following bank account: 

 - b. Any money held in the following bank account: 

 - c. Genuine holdings of any and each of the cryptocurrencies known as BTC (Bitcoin), BSV (Bitcoin Satoshi Vision);
 - d. The property held by or on behalf of Dr Wright in Bagnoo, Australia.

8.

- a. If the total value free of charges or other securities (“unencumbered value”) of the Respondents’ assets in England and Wales exceeds £1,089,000, the Respondents may remove any of those assets from England and Wales or may dispose of or deal with them so long as the total unencumbered value of the Respondents’ assets still in England and Wales remains above £1,089,000.
- b. If the total unencumbered value of the Respondents’ assets in England and Wales does not exceed £1,089,000 the Respondents must not remove any of those assets from England and Wales and must not dispose of or deal with any of them. If the Respondents have other assets outside England and Wales they may dispose of or deal with those assets outside England and Wales so long as the total unencumbered value of all his assets whether in or outside England and Wales remains above £1,089,000.

PROVISION OF INFORMATION

9.

- a. Unless sub- paragraph (c) below applies, and subject to the exception provided for by sub-paragraph (d), each of the Respondents must by 4pm London time on 19 April 2024 and to the best of their ability inform the Applicants’ solicitors of all their respective assets worldwide as at 00.01 am on the date of this Order exceeding £10,000 whether in their own name or not and whether solely or jointly owned, giving the value, location and details of all such assets.
- b. For the purposes of sub-paragraph (1) above the value, location and details of the following asset classes shall mean:
 - i. A bank account: the name(s) in which the account is held, the number of the account (including sort code), the branch of the bank at which the account is held and the balance.
 - ii. Real property: the address and estimated value of the property.
 - iii. Personal property: the nature and estimated value of the property, and the address or location at which it is to be found. For the avoidance of doubt, ‘personal property’ extends to cryptocurrency holdings and the location includes the wallet addresses, exchanges, or equivalent locations in which that cryptocurrency is held.
 - iv. Shares in a company: the name and jurisdiction of incorporation of the company and the number and type of shares held. Further, if the company is trading, the nature of the company’s business and the approximate value of its shares. If the company is non-trading, and holds one or more assets with a value of more than £10,000, the value, location and details of such asset(s).
 - v. Shares at the top of a corporate chain (“TopCo”) holding (whether directly or indirectly) a trading company or a non-trading company holding an asset with a value of more than £10,000: the information referred to in (d) together with the structure by which the trading company or asset is held and the estimated value of the shares in TopCo.
 - vi. An interest in a trust, foundation or similar entity: the name of the trust, the names and addresses of the trustees, the nature of the interest and the nature, estimated value and location of trust assets worth in excess of £10,000.
 - vii. Encumbered property: the fact that property is encumbered, the nature of the encumbrance and the effect of the encumbrance on the value of the property.

- c. If the provision of any of this information is likely to incriminate the Respondents or any of them in any jurisdiction they may be entitled to refuse to provide it but is recommended to take legal advice before refusing to provide the information. Wrongful refusal to provide the information is contempt of Court and may render the First Respondent liable to be imprisoned, fined or have his assets seized, and the Second and Third Respondent liable to be fined or have their assets seized.
 - d. If by 4pm on Thursday 18 April 2024, the Respondents pay into the Court Funds Office the sum of £1,089,000 and confirm the same in writing to the Court and the Applicants' solicitors, the disclosure provision in paragraph 9(a) is suspended pending confirmation from the Court Funds Office that the payment has cleared. If the payment does not clear, including but not limited to the return of an unpaid cheque, the suspension is lifted immediately such that the disclosure obligation in paragraph 9(a) becomes immediately effective, and the Respondents must provide the disclosure in paragraph 9(a) immediately, and in any case by no later than 10am the next business day. The Respondents shall seek confirmation from the Court Funds Office as to the status of that payment by 4pm daily and inform the Applicants' solicitors of the Court Funds Office's response immediately on receipt thereof.
10. By 4pm three business days after the date in paragraph 9(a) or as amended by paragraph 9(d), each of the Respondents must swear and serve on the Applicants' solicitors an affidavit confirming (and if necessary, updating), the information to be provided pursuant to paragraph 9 above.

ENFORCEMENT OVERSEAS

11. The Applicants have permission to (i) have this order recognised and enforced and/or (ii) seek a mirror order, in the Courts of the Commonwealth of Australia, the Republic of Seychelles, Antigua and Barbuda and the Republic of Singapore in support of the English proceedings.

EXCEPTIONS TO THIS ORDER

- 12.
- a. This order does not prohibit each of the Respondents from spending up to £4,000 a week towards, in the case of the First Respondent, his ordinary living expenses, or an equivalent sum for the operation of the Second and / or Third Respondent and also a reasonable sum on legal advice and representation. But before spending

any money the Respondents must tell the Applicants' legal representatives where the money is to come from.

- b. This order does not prohibit the Respondents from dealing with or disposing of any of its or his assets in the ordinary and proper course of business, but before doing so the Respondents must give the Applicants' legal representatives 2 clear working days' notice his or its intention of doing so in respect of any transactions exceeding £10,000 in value.
 - c. The Respondents may agree with the Applicants' legal representatives that the above spending limits should be increased or that this order should be varied in any other respect, but any agreement must be in writing.
13. This order will cease to have effect if the Respondents —
- a. provide security by paying the sum of £1,089,000 into Court, to be held to the order of the Court, in which case this order will cease to have effect on the Business Day when cleared funds are received (if received by 4pm or if not, the next Business Day); or
 - b. make provision for security in that sum by another method agreed with the Applicants' legal representatives, in which case this order will cease to have effect on the Business Day when any such security is confirmed to be in place to the satisfaction of the Applicants' legal representatives (acting reasonably), if such confirmation is capable of being given by 4pm on that Business Day, or if not, the next Business Day).
 - c. If this Order ceases to have effect, the Return Date shall be deferred to the Form of Order hearing in the Joint Trial.

COSTS

14. The costs of this application are reserved to the Judge hearing the application on the Return Date.

VARIATION OR DISCHARGE OF THIS ORDER

15. Anyone served with or notified of this order may apply to the Court at any time to vary or discharge this order (or so much of it as affects that person), but they must first inform the Applicants' solicitors. If any evidence is to be relied upon in support of the application, the substance of it must be communicated in writing to the Applicants' solicitors in advance.

INTERPRETATION OF THIS ORDER

16. A Respondent who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.
17. A Respondent which is not an individual which is ordered not to do something must not do it itself or by its directors, officers, partners, employees or agents or in any other way.
18. A working day shall mean a weekday that is not a bank holiday in England and Wales.

PARTIES OTHER THAN THE APPLICANTS AND RESPONDENTS

19. Effect of this order

It is a contempt of Court for any person notified of this order knowingly to assist in or permit a breach of this order. Any person doing so may be imprisoned, fined or have their assets seized

20. Set off by banks

This injunction does not prevent any bank from exercising any right of set off it may have in respect of any facility which it gave to the Respondents before it was notified of this order

21. Withdrawals by the Respondents

No bank need enquire as to the application or proposed application of any money withdrawn by the Respondents if the withdrawal appears to be permitted by this order.

22. Persons outside England and Wales

- a. Except as provided in paragraph (b) below, the terms of this order do not affect or concern anyone outside the jurisdiction of this Court.
- b. The terms of this order will affect the following persons in a country or state outside the jurisdiction of this Court—
 - i. the Respondents or their officer or his agent appointed by power of attorney;
 - ii. any person who –
 1. is subject to the jurisdiction of this Court;
 2. has been given written notice of this order at its, her or his residence or place of business within the jurisdiction of this Court;and

3. is able to prevent acts or omissions outside the jurisdiction of this Court which constitute or assist in a breach of the terms of this order; and
- iii. any other person, only to the extent that this order is declared enforceable by or is enforced by a Court in that country or state.

23. Assets located outside England and Wales

Nothing in this order shall, in respect of assets located outside England and Wales, prevent any third party from complying with:-

- a. what it reasonably believes to be its obligations, contractual or otherwise, under the laws and obligations of the country or state in which those assets are situated or under the proper law of any contract between itself and the Respondent; and
- b. any orders of the Courts of that country or state, provided that reasonable notice of any application for such an order is given to the Applicants' solicitors.

COMMUNICATIONS WITH THE COURT

All communications to the court about this order should be sent to –

Chancery Judges' Listing, Ground Floor, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL quoting the case number. The telephone number is 020 7947 6690.

The offices are generally open between 10 a.m. and 4.30 p.m. Monday to Friday.

NAME AND ADDRESS OF THE APPLICANTS' LEGAL REPRESENTATIVES

The Applicants' legal representatives are: Macfarlanes LLP, 20 Cursitor Street, London, EC4A 1LT . Ref: LEXH/CJJC/CZZA/804851.

SCHEDULE A – AFFIDAVITS

The Applicants rely on the following affidavit: Lois Evelyn Horne and Exhibit LEH1

SCHEDULE B – UNDERTAKINGS GIVEN TO THE COURT BY THE APPLICANT

- (1) If the Court later finds that this order has caused loss to the Respondents or any of them and decides that the Respondents should be compensated for that loss, the Applicants will comply with any order the Court may make.
- (2) £150,000 of the security held in the Courts Fund Office further to the Orders of Mellor J dated 30 October 2023 (“the **October Order**”) and 20 December 2023 (“the **PTR Order**”) shall stand as fortification in respect of any order the Court may make pursuant to paragraphs (1) above and (5) below.
- (3) The Applicants will serve as soon as reasonably practicable upon the solicitors for the Respondents together with this order (or further copy of this Order if it has already been served on them):-
 - a. an application notice for continuation of the order; and
 - b. a transcript of the hearing on 12 April 2024 (if available) or otherwise a full note of the hearing.
- (4) Anyone notified of this order will be given a copy of it by the Applicants’ legal representatives.
- (5) The Applicants will pay the reasonable costs of anyone other than the Respondents which have been incurred as a result of this order including the costs of finding out whether that person holds any of the Respondents’ assets and if the Court later finds that this order has caused such person loss, and decides that such person should be compensated for that loss, the Applicants will comply with any order the Court may make.
- (6) If this order ceases to have effect (for example, if the Respondents provide security) the Applicants will immediately take all reasonable steps to inform in writing anyone to whom it has given notice of this order, or who it has reasonable grounds for supposing may act upon this order, that it has ceased to have effect.

- (7) The Applicants will not without the permission of the Court use any information obtained as a result of this order for the purpose of any civil or criminal proceedings, either in England and Wales or in any other jurisdiction, other than this claim or the claims in overseas jurisdictions addressed at paragraph 12 above.
- (8) The Applicants will not without the permission of the Court seek to enforce this order in any country outside England and Wales or seek an order of a similar nature including orders conferring a charge or other security against the Respondents or the Respondents' assets, save that (as above) the Applicants shall have permission to have this order recognised and enforced and/or seek a mirror freezing injunction, in the Courts of the Commonwealth of Australia, the Republic of Seychelles, Antigua and the Republic of Singapore in support of the English proceedings.
- (9) In the event that the Applicants seek to have this order enforced and/or seeks a mirror freezing injunction in the Courts of the Commonwealth of Australia, the Republic of Seychelles, Antigua and the Republic of Singapore in support of the English proceedings, they will seek to ensure (and, insofar as necessary, cooperate with the Respondents to ensure) that the Respondents obtain the benefit of any relevant exceptions and protections which are substantially the same as those available to him under this order. In the event that it is not possible to obtain any such relevant exceptions and protections in any of the above foreign jurisdictions, the Applicants will refrain from taking any steps to obtain such relief in that foreign jurisdiction, without a further order from the English court permitting it to do so.