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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 18-80176-CIV-BB

IRA KLEIMAN, ET AL.,	)	
	)	
PLAINTIFFS,	)	
	)	
-v-	)	
	)	
CRAIG WRIGHT,	)	
	)	
DEFENDANT.	)	West Palm Beach, Florida
	)	August 26, 2019
_____	)	

TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS  
BEFORE THE HONORABLE BRUCE E. REINHART  
UNITED STATES MAGISTRATE JUDGE

Appearances:  
(On Page 2.)

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3  
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22 \* \* \* \* \*

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1 (Call to the order of the Court.)

2 THE COURT: Good afternoon, everyone. Have a seat,  
3 please.

4 We are here on case number 18-80176, Ira Kleiman, as  
5 Personal Representative of the Estate of David Kleiman and W&K  
6 Info Defense Research, LLC, versus Dr. Craig Wright.

7 Let me start by having counsel make their  
8 appearances, and I'll start with counsel for the plaintiff.

9 MR. FREEDMAN: Your Honor, Vel Freedman for the  
10 plaintiff.

11 THE COURT: Good afternoon, Mr. Freedman.

12 MR. ROCHE: Kyle Roche, plaintiff.

13 THE COURT: Good afternoon, Mr. Roche.

14 MR. BRENNER: Good afternoon. Andrew Brenner for  
15 the plaintiff.

16 THE COURT: Mr. Brenner, good afternoon.

17 And for the defense?

18 MS. MCGOVERN: Good afternoon, Your Honor. Amanda  
19 McGovern for defendant Dr. Craig Wright.

20 THE COURT: Ms. McGovern, good afternoon.

21 MR. RIVERO: Good afternoon, Your Honor. Andres  
22 Rivero for Dr. Wright, who is present, as the Court surely  
23 knows.

24 THE COURT: Mr. Rivero, Dr. Wright, welcome.

25 MR. KASS: Good afternoon. Zalman Kass for the

1 defendant, Dr. Craig Wright.

2 THE COURT: Mr. Kass, good afternoon.

3 MS. MARKOE: Good afternoon, Your Honor. Zaharah  
4 Markoe on behalf of Dr. Wright.

5 THE COURT: Ms. Markoe, good afternoon.

6 Okay. So since the last time we were all together,  
7 I have received the exhibits that were submitted -- I'm sorry,  
8 the deposition designations that were filed in the record, and  
9 I have reviewed those.

10 Was there any other evidence that either side had  
11 submitted into the record or wants to submit into the record  
12 at this time?

13 Mr. Freedman, Mr. Roche, Mr. Brenner, anything else?

14 MR. FREEDMAN: If you give me one minute, Your  
15 Honor.

16 THE COURT: Sure.

17 MR. FREEDMAN: No, Your Honor.

18 THE COURT: Okay. For the defense?

19 Well, plaintiff rests.

20 Defense, any other evidence?

21 MS. McGOVERN: No, Your Honor.

22 THE COURT: All right. So the evidence is now  
23 closed, and I will hear argument. I think Ms. McGovern, I --  
24 since it's Dr. Wright's burden as to the impossibility of  
25 compliance, but it's ultimately the plaintiffs' burden as to

1 the overall question of sanctions, but I will let Dr. Wright  
2 have the first and last word.

3 So Ms. McGovern, whenever you're ready.

4 MS. McGOVERN: May I stand at the podium, Your  
5 Honor?

6 THE COURT: You may.

7 Before you do that, I do have to take a brief  
8 recess -- a brief break for one second.

9 Mr. Freedman, I hope you have a healthy young one at  
10 home since we last saw you. Is everything okay?

11 MR. FREEDMAN: Yes, Your Honor, a young beautiful  
12 girl.

13 THE COURT: Congratulations; mazel tov.

14 MR. FREEDMAN: Thank you.

15 THE COURT: Counsel, I have nothing -- I'm not  
16 saying you should use it up, but I have nothing else scheduled  
17 this afternoon. So I want everyone to take as much time as  
18 they feel they need to make whatever arguments they want to  
19 make.

20 MR. FREEDMAN: Your Honor, actually, unrelated to  
21 this, just as a housekeeping matter before we start.

22 THE COURT: Yes.

23 MR. FREEDMAN: The Court signed the letter rogatory,  
24 but the Court signed a redacted version of the letter  
25 rogatory, and we've begun preparing those papers for

1 submissions to the UK courts, and our UK counsel has informed  
2 us we need an unredacted signed copy by the Court. I did  
3 bring a copy with me, but I mistakenly brought one that had  
4 Judge Bloom's signature line on it. So maybe if we could mail  
5 one to the Court or e-mail it.

6 THE COURT: How big is the packet?

7 MR. FREEDMAN: It's small. It's just the one letter  
8 rogatory. It's like a couple of pages.

9 THE COURT: You can -- yeah, assuming it's something  
10 that the other side has seen -- I understand they don't  
11 necessarily agree with my granting the letter rogatory. As  
12 long as they've seen it and approved it for form, you can just  
13 e-mail us a PDF, we'll print it out and I can sign it.

14 MR. FREEDMAN: Thank you.

15 THE COURT: It's my pleasure.

16 All right. Ms. McGovern, whenever you're ready.

17 MS. McGOVERN: Good afternoon, Your Honor.

18 THE COURT: Good afternoon.

19 MS. McGOVERN: Thank you very much.

20 Your Honor, the Court ordered Dr. Wright to produce  
21 a list of public addresses, or actually the Bitcoin that was  
22 held as of 12/31/2013. So the issue before this Court is  
23 whether Dr. Wright has demonstrated an inability to comply  
24 with this order. The decisions that are addressing this  
25 shifted burden explain that it's composed of the following:

1 An explanation as to why compliance is not possible; and a  
2 good faith effort to comply using all reasonable efforts  
3 possible.

4 In response to the Court's order, Dr. Wright has  
5 provided the first 70 of those public addresses. There are  
6 over 16,000. In addition, Dr. Wright has disclosed his full  
7 holdings of Bitcoin as of December 31st, 2013, and has stated  
8 under oath exactly how much Bitcoin he holds as of that date,  
9 and has confirmed under oath that that Bitcoin has not moved.

10 The explanation, the first part, Dr. Wright  
11 testified before Your Honor in a full-day evidentiary hearing  
12 under oath that the public addresses are contained in an  
13 encrypted file that cannot be accessed at this time. The  
14 testimony was unequivocal. When asked whether Dr. Wright  
15 specifically could provide a list of those public addresses,  
16 and, in fact, whether it was impossible for him to provide  
17 those public addresses at this time, he testified on page 22:  
18 Yes, it is.

19 In addition, when asked specifically if he could  
20 provide the remaining list of public addresses beyond the  
21 first 70 that he provided, that if he could do it, would he do  
22 it.

23 And he testified unequivocally: Yes, I would.

24 Beyond that, Your Honor, he explained why it makes  
25 no sense that he wouldn't. From a credibility perspective,

1 which is something that the plaintiffs have argued on this  
2 issue before this Court, this limited issue before this Court,  
3 the plaintiffs essentially have argued he cannot be believed.  
4 That's not evidence.

5           In explaining why he would provide the list of  
6 public addresses if he could -- and, in fact, it strains  
7 credulity as to why he wouldn't do that -- he went into  
8 detailed explanation as to how the process worked. He  
9 specifically explained that in 2011, he disassociated himself  
10 with the file with Dave Kleiman's help for a number of  
11 reasons, the first of which was that he did not want to be  
12 associated with the name Satoshi Nakamoto. And the reason for  
13 that was because the invention that he testified under oath he  
14 created was being misused in terrible ways: As heroin  
15 markets, pedophilia centers and other things.

16           So his testimony when asked, how is it possible that  
17 someone with that amount of Bitcoin wouldn't keep a file so  
18 that he could access the public addresses later, he explained  
19 he wanted total disassociation with it. It strains credulity,  
20 according to Dr. Wright, and it seems reasonable to believe  
21 him, that someone would want to be associated with that kind  
22 of an invention. So the rationale for disassociating himself  
23 with the file and the Bitcoin at that time is not incredulous.

24           In addition, the value of the Bitcoin in 2011 is not  
25 what it is today. Today the numbers are staggering, there's

1 no question about it. That wasn't the case then.

2           Additionally, Dr. Wright explained that this process  
3 in which he encrypted the file and the reason why he cannot  
4 access it, it is impossible to access, is because Dave Kleiman  
5 is dead. In addition, the information that could possibly  
6 help him decrypt the file now, apart from the fact that he  
7 can't speak to his good friend, Dave Kleiman, is the fact that  
8 the files, the electronic devices and the information that  
9 Dave Kleiman had at his house has been discarded, overwritten,  
10 and is encrypted.

11           Those are undisputed facts in this case.

12           Dr. Wright further testified under oath that it is  
13 very possible, based upon the manner in which the encrypted  
14 file was set up, that the information to decrypt the file,  
15 process the algorithm that would allow him to generate the  
16 public addresses and provide that information could be  
17 available in January 2020. Discovery has been ordered;  
18 discovery is not complete.

19           If, in fact, Dave Kleiman's devices are later  
20 decrypted and information becomes available when the forensic  
21 analyses are complete, and that information allows an earlier  
22 access, that may remedy the situation even earlier than  
23 January.

24           In addition, Dr. Wright produced testimony, or  
25 provided testimony and produced information in an effort to

1 demonstrate to this Court all reasonable efforts in good faith  
2 to comply with this Court's order. Dr. Wright instruction  
3 high-level staff at nChain to do everything that they could to  
4 provide what was a probabilistic list of the public addresses  
5 beyond the first 70 that were produced.

6           The plaintiffs criticized that process, arguing that  
7 the information and the criteria that was used was in the  
8 control of Dr. Wright. Of course, it was. It was, in fact,  
9 the information that Dr. Wright had that was utilized to try  
10 to generate a list of the probabilistic public addresses that  
11 would be available. That information was explained by Steve  
12 Shadders, who testified under oath as to the procedures that  
13 he followed, and that he provided that information at the  
14 instruction of Dr. Wright, who was attempting to comply with  
15 this Court's order.

16           The list of public addresses, a probabilistic list,  
17 was a attempt at a complete inclusive list of public addresses  
18 that Dr. Wright had beyond the first 70 produced. That list  
19 was provided to plaintiffs' counsel on June 28th at the close  
20 of the first evidentiary hearing. After the close of the  
21 evidentiary hearing, Your Honor, it was then produced to them  
22 in electronic file.

23           At the cross-examination of Steve Shadders on  
24 August 5th, the second day of this Court's evidentiary  
25 hearing, there was absolutely no evidence provided that any

1 analyses on that probabilistic list was done.

2 Steve Shadders also testified and provide --  
3 provided exclement (sic) explanation as to what the public  
4 address information would provide to the plaintiffs. We  
5 believe that's important, Your Honor, because the holdings  
6 that Dr. Wright had as of December 31st, 2013, have been  
7 provided, and the information regarding the public addresses,  
8 if, in fact, he had a list now that he could say, I've done  
9 everything I can to just remember the 16,000-and-some public  
10 addresses, wouldn't necessarily provide the plaintiffs with  
11 any additional information, because as Steve Shadders  
12 testified, as well as Dr. Wright testified, ownership cannot  
13 be determined by having a public address.

14 Further, whether somebody mined with another person,  
15 even if it were possible during the relevant time period,  
16 which it was not, cannot be determined by having the public  
17 address.

18 So the information that a public address can provide  
19 to the plaintiffs in this case should be considered by this  
20 Court in addressing the inability to provide that to  
21 plaintiffs at this juncture. It's our position, Your Honor,  
22 that the evidence shows, that the evidence demonstrates, that  
23 that information does not provide plaintiffs with information  
24 that merits the kind of allegations that are being made  
25 surrounding its, the plaintiffs', inability to obtain that

1 information now.

2 Plaintiffs have not produced any evidence in this  
3 evidentiary hearing that defeats impossibility, Your Honor.  
4 There's been no witness provided that rebuts Dr. Wright's  
5 unequivocal testimony that he cannot provide the public  
6 addresses at this time.

7 Plaintiffs' expert did not address that question.  
8 Instead, plaintiff spent most of the cross-examination of  
9 Dr. Wright on reviewing and reading verbatim lines in metadata  
10 with respect to e-mails and other documents. Apparently, the  
11 primary argument in response to impossibility or the inability  
12 to access the public addresses is something -- is simply or is  
13 nothing more than -- I'm not saying that it's -- should be  
14 taken lightly; credibility's important. The plaintiffs'  
15 entire theme on this issue before this Court is that  
16 Dr. Wright should not be believed. Supposition and belief is  
17 not evidence, and the rationale and the explanations that  
18 Dr. Wright has provided as to his inability, separate and  
19 apart from his unequivocal statements that he is unable to do  
20 it, makes sense.

21 When asked if Dr. Wright has already sustained or  
22 has already suffered certain consequences as a result of these  
23 contempt proceedings, his answer to this Court was: Yes.  
24 Can't speak to his mother; he's having difficulty talking to  
25 his wife. These are serious allegations the plaintiffs have

1 lodged in this case, and he's here today for that reason. He  
2 is being charged in this case in this -- on this issue before  
3 this Court with a willful violation of a federal court order,  
4 and he has testified and explained that he is taking that very  
5 seriously.

6 Your Honor, we understand there's been a delay, and  
7 Your Honor asked Dr. Wright about that delay on June 28th and  
8 specifically asked if you knew about -- or that you knew that  
9 you weren't able to access the encrypted file with the public  
10 addresses at the time they were requested, why didn't you just  
11 say that? Why was there a period from February, March and  
12 April, when we were discovering that and reaching a full  
13 understanding of what you're testifying under oath now?

14 And if we could go back, Your Honor, we would. If  
15 we could go back with a fuller understanding of what the  
16 issues are in this case, I'm sure the plaintiffs would. I  
17 don't think Ira would have wiped out the files with pictures  
18 of his children. Or perhaps there's something more. But at  
19 this stage, things have been done that wouldn't have been  
20 done, particularly in light of the fact that in 2014, when  
21 Dr. Wright contacted Dave Kleiman's father, he specifically  
22 said: There is important information in Dave Kleiman's  
23 devices, protect it, and the opposite was done.

24 So during the period of time in which the issue of  
25 the public addresses was being discovered, there were a lot of

1 other things happening, as well, in this case. There is a  
2 massive amount of discovery that has been conducted in good  
3 faith in this case.

4 We don't mean to suggest, Your Honor, that we don't  
5 understand the issue before you, and I'm certainly not trying  
6 to detract the Court's attention on what the issue is. We  
7 understand it, and we're very -- taking it very seriously.

8 But in terms of context and in terms of explanation,  
9 we think it's important to understand what that context is.  
10 So when you're unable to do something, and you're trying to  
11 understand exactly what the circumstances are about it,  
12 particularly in light of the fact that we have so many  
13 computers and so much data, and corporations and available  
14 resources, we wanted to make sure that, in fact, all of the  
15 information was put before the Court and it was accurate.

16 If Dr. Wright did not wish to allow the plaintiffs  
17 access to the public addresses, he explained under oath that  
18 the last thing he would have done is provide the first 70,  
19 because that, in fact, as he explained, identifies him as  
20 Satoshi Nakamoto. Producing the rest of the public addresses  
21 provide -- causes absolutely no concern.

22 And importantly, plaintiffs have offered no  
23 explanation as to why he wouldn't do it; why he would put  
24 himself, his credibility, the credibility of his counsel on  
25 the line if the public addresses don't do what the plaintiffs

1 are claiming it does; and if he's already tried to comply by  
2 providing the first 70, and if he's asked his staff to give a  
3 list of every single public address that could possibly be his  
4 based upon the criteria that he was able to narrow.

5           The explanation that the information may come in  
6 January 2020 is important in light of the fact that discovery  
7 is ongoing. But it's also important because we're not even  
8 done reviewing Dave's devices. We haven't gotten to the  
9 point, Your Honor, of even being able, from a defense  
10 perspective, to go beyond simply the identification of the  
11 files that were deleted. By court order, our forensic experts  
12 are reviewing that information, and we're not at the point  
13 where we can, as they say in today's parlance a lot, take a  
14 deep dive. But we're very anxious to do it, and we believe  
15 information, critical information, about this case is  
16 contained there.

17           To take a leap and claim and argue that Dr. Wright  
18 should be foreclosed from a defense, a robust defense in this  
19 case, on claims of an oral general partnership, a default  
20 judgment for half the Bitcoin, some sort of punitive sanction  
21 stated publicly about his intentions regarding this Court's or  
22 regarding the inability to comply with this Court's order is  
23 simply not proportionate to the facts and circumstances that  
24 have been presented and the evidence that's been presented on  
25 this issue.

1           Your Honor, I'd also like to say that this issue is  
2 not every issue in the case. We come before Your Honor and  
3 often hear the same mantra about things that aren't related to  
4 the issue before this Court. We believe it's very important,  
5 Your Honor, that the issue before this Court, which is a  
6 limited issue of a noncompliance of a discovery order, doesn't  
7 mean it's not important. Simply talking about the definition  
8 of what is before the Court not be conflated with other issues  
9 that have been presented to the Court on other facts and other  
10 allegations.

11           In other words, Dr. Wright doesn't lose his right to  
12 due process to a jury trial because there have been some sort  
13 of credibility determination vel non in this case that he's no  
14 longer entitled to those things.

15           In the absence of any evidence, Your Honor, that  
16 defeats impossibility, that's what we're left with.

17           Your Honor asked if the parties, counsel for the  
18 parties, could think about appropriate remedies in this case  
19 for what has transpired concerning the inability to provide  
20 the public addresses and the timing of that. And, Your Honor,  
21 we are very, very mindful of the importance of mitigating  
22 potential harm. Exxon is ringing in my ears. But we do  
23 believe that it is important to keep in mind here that it is  
24 not a willful noncompliance that we are looking at here. The  
25 intentions were not to hide and deceive. If that were the

1 case, common sense would dictate that you wouldn't say exactly  
2 how much Bitcoin you have as of 12/31/13, you wouldn't provide  
3 the first 70, and you wouldn't pull high-end staff away from  
4 other projects to provide a list, a probabilistic list, an  
5 all-inclusive list of the public addresses that they probably  
6 are in light of the fact that the admission under oath, which  
7 is not refuted, is that the Bitcoin hasn't moved.

8           So in terms of the remedy, Your Honor, we believe  
9 this Court should determine first and foremost, in light of  
10 the absence of evidence regarding a willful violation as to  
11 what information the plaintiffs have not received, and, in  
12 fact, the prejudice to the plaintiffs if they don't receive  
13 that information at this time. If, in fact, the Bitcoin  
14 hasn't moved, and in light of the fact that discovery is not  
15 over, and with the very high possibility that this information  
16 will ultimately be provided to plaintiffs before trial, we  
17 don't believe, even assuming that the Court were to impose a  
18 sanction, that anything beyond a sanction for the period of  
19 time that was taken in reaching a full understanding of this  
20 issue should be imposed. In other words, the plaintiffs'  
21 counsel engaged in efforts that perhaps were not necessary and  
22 could be determined to have been wasted had that information  
23 been provided sooner, and we understand that. The same is  
24 true, Your Honor, on our side.

25           And if that's the case, any remedy that the Court

1 should impose reasonably should be limited to that reasonable  
2 amount of time that the plaintiffs spent working towards that  
3 ultimate understanding. We don't believe, Your Honor, that it  
4 would be fair to include the evidentiary hearing on that  
5 issue, and here's why.

6           We highly doubt plaintiffs' counsel would have  
7 simply taken Dr. Wright's statement that the file is encrypted  
8 and he cannot access it without requesting an evidentiary  
9 showing. We believe, Your Honor, we would have needed that  
10 evidentiary showing, and we would have needed to engage in  
11 that process anyway. But for the period of time that Your  
12 Honor referenced on June 28th, where you specifically asked  
13 Dr. Wright about that time period, we believe any -- any  
14 sanction should be limited to that reasonable attorney's fee,  
15 which can be presented to Your Honor and addressed as to its  
16 reasonableness at a later time, and we do not believe, Your  
17 Honor, that that sanction should imply in any way a willful  
18 noncompliance with this Court's order, simply because the  
19 gravity with which that kind of finding carries would be  
20 unfair.

21           In an ideal world, Your Honor, in light of the fact  
22 that discovery has not been completed, and Dr. Wright has  
23 testified as to the very high possibility that he will receive  
24 that information in January, we ask that you -- that the Court  
25 refrain from imposing any sanction at all, including a

1 reasonable attorney's fee, until January 31st, 2020.

2 I know what you're going to hear next. It's going  
3 to be a request for the highest sanction possible: Default  
4 judgment, strike pleadings, essentially determine the case  
5 over and claim game over. The law is not designed to set a  
6 litigant up for failure. And without evidence -- and there is  
7 none -- that Dr. Wright has willfully failed to comply with  
8 this Court's order, we believe, Your Honor, that even the  
9 suggestion of that kind of a sanction cannot be reconciled  
10 with our court of justice and with our system.

11 We also recognize, Your Honor, that the Court has  
12 spent time, and the Court has put in effort in reaching a full  
13 understanding on this issue. I know Bitcoin's not new, but  
14 Shamir schemes, and Bitcoin, and protocol, and code, and all  
15 of those things wrapped together, and a deceased, the other  
16 main witness in this case who cannot speak and whose files are  
17 not available, because they're encrypted themselves or they've  
18 been erased, doesn't necessarily come up in one case all at  
19 the same time.

20 So we're working through it, and we're working  
21 through it in good faith, Your Honor. I can say -- and we  
22 just have to glance over there to the right real quick, that  
23 everybody on this side is honored to be in front of this  
24 Court. Dr. Wright has come from the UK for a day because --  
25 might not be the right word -- but in the form of an

1 allocation recognizes what this Court has done.

2           The mere fact that an explanation was provided in  
3 the manner in which provided is a testament to the kind of  
4 system that we have, which is a system of truth and arriving  
5 at it, and the ability to be able to explain things that are  
6 difficult to explain, even if they're not perhaps fully  
7 explained the first time because they're complicated.

8           Your Honor, with respect to the issue of the Court  
9 and the Court's time, Dr. Wright would like to address the  
10 Court very, very briefly.

11           THE COURT: Sure.

12           Dr. Wright, I'd be pleased to hear anything you'd  
13 like to say.

14           Good afternoon.

15           THE WITNESS: Good afternoon, Your Honor.

16           I'd like to start by saying I apologize sincerely.  
17 I quite often make comments to people and don't realize what  
18 they're missing. So I answer something, and they don't  
19 understand the full answer. I say I'm not able to do  
20 something, but I'm still working on it, and I don't explain  
21 that. And I even do it with my own attorneys, who are  
22 slightly learning how to deal with me.

23           I'm also working on everything I can. I believe  
24 I'll know the addresses by January. And on top of that, even  
25 if I don't have the private keys, I'm working on other things,

1 including legal aspects, et cetera.

2           Some of what I'm working on on my doctorate, where  
3 I've given up time to actually where I'm supposed to be  
4 attending is on the nature of things like worldwide freezing  
5 orders and other things, so that some of the things I've been  
6 talking about, like, like crimes and whatever else involving  
7 Bitcoin so that judges like yourself will be able to issue  
8 orders and have them enforced and have Bitcoin seized. And  
9 that will include mine if you rule against me.

10           By the time this case is over --

11           MR. FREEDMAN: Your Honor, can we just object?

12           THE WITNESS: -- I will be able to do that, and I  
13 will --

14           MR. FREEDMAN: The witness hasn't been sworn in, and  
15 I don't know if this is argument, or testimony, or evidence,  
16 or . . .

17           THE COURT: I'm considering it argument and not  
18 evidence, and I'm letting Dr. Wright -- he asked to speak.  
19 I'll hear what he has to say. But I'm not considering it as  
20 proof or evidence that will weigh on me whether burdens have  
21 been met in this case. But I think it's fair to allow  
22 Dr. Wright to speak if he'd like to.

23           Dr. Wright, you may condition.

24           THE WITNESS: If you need to swear me in on this, I  
25 will.

1 THE COURT: I'm good.

2 THE WITNESS: But by the time this case is over, I  
3 can tell you that there will be ways of recovering Bitcoin,  
4 whether people like to admit that or not. And if judges, in  
5 global orders, enforced with things like crimes or things that  
6 I'll comply with, which I will, want to seize Bitcoin or want  
7 to force it to be issued, then that will be possible. And in  
8 part, I'm working on that.

9 So no matter what happens in this case, I may not be  
10 able to give you those addresses now, but as soon as I can, I  
11 will get them to you. And so I just want to say I'm sorry I  
12 haven't been able to yet, Your Honor.

13 THE COURT: Thank you, Dr. Wright. I appreciate  
14 your time. Appreciate you being here; it's important. Thank  
15 you.

16 Ms. McGovern.

17 MS. McGOVERN: Thank you, Your Honor.

18 THE COURT: Ms. McGovern, you're an outstanding  
19 advocate. You've made an excellent presentation for  
20 Dr. Wright, and I take to heart everything you've said to me,  
21 but the last thing you mentioned is the importance of truth,  
22 so let me ask you: On April 18th, you filed a motion in which  
23 you represented that Dr. Wright was not the trustee of any  
24 trusts that held Bitcoin, and three weeks later, he swore an  
25 affidavit based on my order saying that he was. How is one of

1 those not willfully false?

2 MS. McGOVERN: Your Honor, I -- the issue concerning  
3 the holdings of the Bitcoin were not an -- were not a willful  
4 false statement. I think, Your Honor, this is a question of  
5 merely sitting down and having a full appreciation for what  
6 the situation was. The --

7 THE COURT: Well, no, no, no.

8 MS. McGOVERN: Perhaps the communication was wrong,  
9 but we -- I will say this, Your Honor. When we -- when we  
10 went to sit down with Dr. Wright to address the question, and  
11 after -- after that we -- we learned a lot of information that  
12 we -- we should have -- we should have more fully understood.  
13 But I will say, Your Honor, there also was the issue of  
14 timing. We were under such -- we were under such complete  
15 time pressure to be able to explain to the Court what exactly  
16 was the holdings of Bitcoin, and who held it, and how it was  
17 held. We were relying on documents that we had received.

18 All I can say in that regard, Your Honor, is is  
19 we -- we did not have a complete appreciation for the holdings  
20 of the Bitcoin, and how they were held, and all of the  
21 different terms and so forth concerning that at the time. We  
22 just didn't have a complete understanding.

23 THE COURT: At which time? At the time of the  
24 motion that you had two months to prepare, or the declaration  
25 that I let you fly to England to sit with your client to

1 prepare?

2 MS. McGOVERN: Your Honor, I mean, I understand your  
3 point. I mean, I understand your point. It's upsetting that  
4 we were incomplete in our information, I understand that.

5 I --

6 THE COURT: Well, you've argued to me that  
7 credibility's important. These are the things I have to look  
8 at.

9 I'd point you to another thing I'll give you an  
10 opportunity to explain to me. In a number of documents, in a  
11 number of pleadings, including in his declaration, Dr. Wright  
12 swore that there was Bitcoin in the trust, Bitcoin currency in  
13 the trust, and yet his testimony before me sitting right there  
14 under oath is: No, it isn't. The keys are there, not the  
15 currency.

16 Reconcile that for me.

17 MS. McGOVERN: Your Honor, I think -- I think that  
18 actually is, from what I -- from what I can understand, is  
19 there -- the trust -- the overlay of the trust and the legal  
20 ownership of the Bitcoin is different than the manner in which  
21 the keys are actually -- in which the coins are actually held.  
22 So there are really two structures. There's a legal  
23 structure, and then there is the technical structure.

24 So the coins are accessed with private keys. The  
25 ownership is arguably governed by the trust documents.

1 THE COURT: No, and I understand that. I understand  
2 there is a difference there. But the coins, the currency can  
3 be transferred.

4 MS. McGOVERN: Yes.

5 THE COURT: We've all talked about that.

6 And clearly the representations that were made in  
7 motions and in Dr. Wright's declaration is that the coins had  
8 been transferred into the trust. They were the corpus of the  
9 trust. That was his word under oath, having sat with his  
10 lawyers for two days, that the coin itself was in the blind  
11 trust, which, by the way, wasn't blind, because he's one of  
12 the trustees. We'll get to that in a second.

13 So how does it then morph to, oh, no, the coin  
14 itself is not in the trust; the coins never moved. What's in  
15 the trust are the keys.

16 Reconcile that for me. How does that not go to his  
17 credibility and the burden that I have to consider in this  
18 case?

19 MS. McGOVERN: I think it fails in terms of its  
20 explanation, Your Honor. I don't -- I don't want to mince  
21 words. I believe that there is a manner in which the trust  
22 ownership over the coins was explained that appears to not  
23 reconcile with the manner in which the coins are held.

24 For example, if there's a trust in the Seychelles  
25 that owns the coins, the coins -- the corpus of -- the coins

1 are the corpus of the trust. But the coins are actually held  
2 in a manner which can only be accessed by having the private  
3 keys. I think, unfortunately, it's an explanation where it's  
4 not a proper legal explanation as to the manner in which a  
5 corpus of a trust is held. The coins have never moved. The  
6 coins have always been mined, and I think Dr. Wright's  
7 explanation was that they were mined, and they've never moved.

8           Then after that, you're talking about the ownership  
9 structure in which the coins are owned. I think that's where  
10 the miscommunication came.

11           THE COURT: Okay. And explain to me how it's a  
12 blind trust if he's the trustee.

13           MS. McGOVERN: Your Honor, when we flew to London,  
14 we had received -- we wanted to gather as many documents as we  
15 could that would explain the structure of the trust, and we  
16 had received an organogram which ultimately didn't reconcile  
17 with the trust document. That's -- that's the explanation as  
18 to that.

19           I think also, the problem was in literally  
20 transcribing and getting before Your Honor during that two- or  
21 three-day window an explanation as to why -- what the  
22 circumstances were regarding the ownership of the trust. And  
23 I think the use of the word "blind," I was actually reading  
24 the paperwork after, you know, later, recently, of course, and  
25 I realized, you know, that's a very cryptic way of describing

1 ownership of these coins.

2 But, Your Honor, in terms of credibility on this  
3 issue, the ownership structure and the location of the  
4 coins -- so we have the location of the coins, or, rather, the  
5 existence of the coins, the holdings of the coins, whether  
6 they've moved, and the ownership structure. I think the  
7 confusion occurred in trying to explain an ownership  
8 structure. Looking back, if we could do this all over again,  
9 I think the answer should have been from the very, very  
10 beginning, had we fully understood it, you've asked for the  
11 public addresses for all Bitcoin held as of 12/31/13.

12 THE COURT: Actually, I never did.

13 MS. McGOVERN: Or --

14 THE COURT: I have never -- because I went back and  
15 looked. I have never ordered the production of public  
16 addresses. I have ordered a listing of his Bitcoin holdings.

17 MS. McGOVERN: Yes, yes.

18 THE COURT: I have never said --

19 MS. McGOVERN: Yes.

20 THE COURT: -- it is limited to the public  
21 addresses.

22 MS. McGOVERN: I agree.

23 THE COURT: So why did I hear for the very first  
24 time on June 28th that public addresses are meaningless, when  
25 we've been talking about them since March?

1 MS. McGOVERN: Your Honor, I -- what I was trying to  
2 say about in response to that issue, though, is in terms of  
3 the public addresses is you're absolutely right. You ordered  
4 holdings of Bitcoin. Because we were looking at this from the  
5 beginning of this case from a tracing perspective, and I  
6 remember specifically when they were specifically asking for  
7 this information, you said, I am not going to allow a tracing  
8 from present backwards. I'm -- I'm not going to allow that.  
9 That was the way this issue first came up.

10 THE COURT: Uh-huh.

11 MS. McGOVERN: But what I am going to allow, because  
12 I believe it's relevant, because their claim is Dr. Wright  
13 stole Dave's Bitcoin, is I'm going to allow from a certain  
14 point to a certain point. In other words, from the beginning  
15 through a certain point.

16 So it was all about the Bitcoin holdings. But in  
17 terms of identifying the holdings, a manner in which you can  
18 identify the -- in other words, you can confirm the holdings  
19 is by identifying a public address, because you look at the  
20 public address, you can see that there's coins there.

21 THE COURT: Right.

22 MS. McGOVERN: Right?

23 THE COURT: There's also wallets, and there's lots  
24 of ways to identify it.

25 MS. McGOVERN: Exactly, Your Honor.

1 THE COURT: In fact, if you go back and look at the  
2 transcript, when I first mentioned it, I said I assumed he can  
3 just produce as well of wallets. That was the term I've used.

4 MS. McGOVERN: Yes.

5 THE COURT: And I've always been very scrupulous to  
6 use the term "holdings," assuming that, as purporting to be  
7 the creator of Bitcoin, Dr. Wright would be in a very good  
8 position to tell me what data point I needed to know. And if  
9 I was at the wrong data point, he was going to tell me.

10 MS. McGOVERN: Right.

11 THE COURT: I didn't hear that until June 28th --

12 MS. McGOVERN: I understand.

13 THE COURT: -- that I had the wrong data point.

14 MS. McGOVERN: I understand, Your Honor. I  
15 understand.

16 THE COURT: So as I said, you're a very good  
17 advocate, Ms. McGovern. Your client has put you in a horrible  
18 position. You are doing everything you can to save him, and  
19 you're doing a great job of it.

20 But let me hear from Mr. Freedman. I'll give you  
21 the last word.

22 MS. McGOVERN: Thank you, Your Honor.

23 THE COURT: Thank you.

24 Mr. Freedman.

25 MR. FREEDMAN: Your Honor, if it's all right, can we

1 take a two-minute break?

2 THE COURT: Yes. I'll take a five-minute break.  
3 We'll be back at 2:20.

4 MR. FREEDMAN: Thank you.

5 (A recess was taken from 2:17 p.m. to 2:22 p.m., after  
6 which the following proceedings were had:)

7 THE COURT: Have a seat, please. All right. Let's  
8 see, everyone's back.

9 All right. Mr. Freedman, whenever you're ready you  
10 may proceed.

11 MR. FREEDMAN: Actually, Your Honor, before I start  
12 the actual closing, I don't know if this would help the Court,  
13 but if it would, Mr. Roche and I were discussing that it might  
14 be beneficial to the Court if the parties submitted proposed  
15 findings of fact, conclusions of law?

16 THE COURT: I don't think that's necessary.

17 MR. FREEDMAN: Okay. Your Honor, the circumstances  
18 of this case are unique, which is something I know you've  
19 heard me say before. The -- our client is deceased, and the  
20 technology at issue in this case is designed to keep secrets.  
21 And based on admissions by Dr. Wright, including a written  
22 e-mail from Dr. Wright to Ira that Dave owns 300,000 Bitcoin  
23 in the trust, our client sued Dr. Wright for his share of the  
24 Bitcoin they mined together as Satoshi Nakamoto.

25 Now, knowing that the information in this case is

1 mostly flowing one way, plaintiffs' position is that  
2 Dr. Wright has perjured, forged and deceived his way through  
3 the discovery process, culminating in the misrepresentations  
4 and forgeries provided to this Court in response to its order  
5 to produce a listing of his Bitcoin holdings.

6 And there are so many misrepresentations, Your  
7 Honor, that I can't possibly focus on them today, and I don't  
8 think the Court wants to hear about them all today. Today, I  
9 want to focus only on the Court's order that Dr. Wright  
10 produce a list of his Bitcoin holdings as of December 31st,  
11 2013. And to really focus on that and the gravity of the  
12 fraud that was attempted to be perpetrated on this Court by  
13 Dr. Wright, I'd like to take a moment to go through how we got  
14 here.

15 Now, given the lack of information, plaintiffs  
16 needed a starting point, and there was an initial request for  
17 all of Dr. Wright's Bitcoin holdings. Plaintiffs wanted to  
18 trace them backward. Dr. Wright's counsel objected, and as  
19 this Court told plaintiffs "no." But as a compromise, the  
20 Court said it would let the plaintiffs pick a relevant time  
21 and trace the Bitcoin forward.

22 After multiple hearings in March of 2019, the Court  
23 ordered Dr. Wright to produce the list before his deposition  
24 or object. During those hearings, the Court found that what  
25 Bitcoin that existed as of December 31st, 2013, and where it's

1 gone since then is relevant to plaintiffs' claim that Craig  
2 converted, Dr. Wright converted the Satoshi Nakamoto  
3 partnership's Bitcoin, and that plaintiffs are entitled to  
4 work forward, to sit in a deposition with Dr. Wright, go  
5 through the list of his Bitcoin, and ask him which were Dave's  
6 and which were his. And at no time during these proceedings  
7 did the defendant ever claim that it was impossible for him to  
8 produce this list.

9 April 4th, 2019, Dr. Wright sits for his deposition.  
10 He never filed his motion. At his deposition he makes the  
11 following statements under oath:

12 First on page 293: Dave has no rights to the trust,  
13 no ownership of the trust, no knowledge of the setup of the  
14 trust.

15 Going to skip down a little bit: Dave was asked  
16 simply to hold a part of some documents and keys that were  
17 split using Shamir's Secret Sharing Scheme so that he did not  
18 even know what he was actually holding.

19 And then on page 294, he answered this to the  
20 following questions:

21 "Did you put Bitcoin into the trust in 2011?

22 "No.

23 "Did you put Bitcoin into the trust in 2012?

24 "No.

25 "Did you ever put Bitcoin into the trust?

1 "No.

2 "Did anyone ever put Bitcoin into the trust?

3 "No.

4 "Did the Tulip Trust ever come to hold private keys  
5 to Bitcoin wallets?

6 "No.

7 "Did it ever come to own or possess private keys to  
8 Bitcoin addresses?

9 "No.

10 "What is the relationship between the Tulip Trust  
11 and Bitcoin?

12 "Answer: What the hell does that question even  
13 mean?"

14 So plaintiffs walked out of Dr. Wright's first  
15 deposition thinking that Dave knew nothing about the setup of  
16 the Tulip Trust, of the trust, and that the trust never  
17 controlled any Bitcoin.

18 Shortly after the deposition, the Craig extend --  
19 the Court extends Dr. Wright's deadline to file his motion for  
20 protective order, and we see the first pivot from Dr. Wright.  
21 He realizes that he must provide the Court with a reason he  
22 can't comply with its order. And so in complete conflict with  
23 his deposition testimony he puts into a motion: In 2011,  
24 Dr. Wright transferred all of his Bitcoin into a blind trust.  
25 Therefore, Dr. Wright cannot give the list the Court -- give

1 the list that the Court is asking for.

2           There's some motion practice, and then on March 3rd  
3 the Court issues an order. The Court recognizes -- denies  
4 Dr. Wright's motion for protective order, recognizes that it's  
5 not an undue burden defense, it's an impossibility defense,  
6 and the Court discredits the impossibility argument, stating  
7 that Craig, Dr. Wright, can get the information from the  
8 trustees.

9           The Court orders him to provide a sworn declaration  
10 identifying the name or location of the blind trust, the  
11 trustees, the beneficiaries, and to produce and swear to the  
12 authenticity of all documents relating to the formation,  
13 administration and operation of the trust and all  
14 transactional records of the blind trust, including records  
15 reflecting transfer of the Bitcoin into the blind trust.

16           Three days later, Dr. Wright's counsel moves for an  
17 extension of time. The Court sets a hearing, and at that  
18 hearing, Dr. Wright's counsel clearly states why they need  
19 more time. I'm quoting here from page 5 of the transcript:  
20 "In order to have a fulsome understanding, a full  
21 understanding of these trusts, and really just being able to  
22 explain them in a straightforward manner and have the  
23 information sworn to, we want to make sure it is absolutely,  
24 unequivocally not confusing and accurate."

25           And then on page 6: "As you know, there are issues

1 regarding, well, I guess allegations of lies and things like  
2 that in this case. We're being very hypersensitive to it."

3           Just skip a couple words: "In fact, actually,  
4 Zaharah and I are flying to London in a couple hours, and the  
5 purpose for the extra time was really just to make sure that  
6 we've got it 100 percent right."

7           The Court grants the extension but notes twice that  
8 it's facially not credible someone would transfer that much  
9 Bitcoin to someone with no record of it. And plaintiffs leave  
10 the hearing believing that whenever the documents finally do  
11 get submitted, they're finally going to have an understanding  
12 of what exactly went on.

13           Now, I want to be clear about something. I am not  
14 making any allegations about the integrity of Rivero Mestre  
15 here at all. I raise these quotes, because I know that there  
16 are very good lawyers on the other side of this case, and  
17 those lawyers went to London and sat down with their client  
18 and instructed him that they needed to be absolutely,  
19 unequivocally not confusing and accurate and 100 percent true.

20           So Dr. Wright's lawyers fly to London, and two days  
21 later Dr. Wright files a sworn statement based on personal  
22 knowledge without any caveats, stating that in 2011 he took  
23 steps to consolidate Bitcoin. That in October of 2012, a  
24 formal trust document was executed creating a corpus of mined  
25 Bitcoin called Tulip Trust I. That the trustees are a UK

1 company called Coin LTD, UK, Uyen Nguyen, Craig Wright, David  
2 Kleiman, Panopticopt, Savannah, and the holder of various PGP  
3 key I.D.s, which he identifies as himself, Satoshi Nakamoto,  
4 Craig Wright. He identifies the beneficiaries as Wright  
5 International Investments and Tulip Trading. And at the end,  
6 he puts in that the access to the encrypted file with the  
7 public and private keys to Bitcoin he mined requires, and I  
8 quote: Myself and a combination of trustees referenced in  
9 Tulip Trust I to unlock based on a Shamir scheme.

10 Five days later, Dr. Wright files another sworn  
11 statement attaching copies of the documents he's been order to  
12 produce. He swears to their authenticity without any caveats,  
13 thus authenticated the Dave Kleiman trust documents that are  
14 plaintiffs' exhibit 1, the Tulip Trust I document, which is  
15 plaintiffs' exhibit 9, and the HIGHSECURED invoice, which is  
16 plaintiffs' exhibit 23.

17 And I want to pause here for a minute, Your Honor,  
18 because this was egregious. Dr. Wright knew he was in  
19 trouble, but instead of coming clean, he willfully and  
20 purposefully submitted evidence he forged to the Court and  
21 swore to its authenticity. And I know that later he says it  
22 wasn't him, and I'll address that dishonesty later.

23 When nothing more comes from Dr. Wright and the list  
24 doesn't appear, plaintiffs move to compel again. The Court  
25 grants the motion to compel, but makes an important

1 observation. And here we see Dr. Wright's misrepresentations  
2 developing. The Court points out that Dr. Wright's  
3 declaration indicates that he knows who has the keys, they are  
4 his trustees, and he hasn't explained why he hasn't obtained  
5 the keys from these trustees. So now Dr. Wright realizes that  
6 the Court has seen through his charade, and that he's going to  
7 have to make up more misrepresentations if he's going to get  
8 through this. So he shows up the morning of June 28th, and he  
9 sits at a deposition, and he states under oath that he paid  
10 for Tulip Trading before 2012, which plaintiffs later show to  
11 be untrue. He bought an aged shelf company in 2014.

12           And he swears under oath that Dave Kleiman wrote  
13 that e-mail on June 24th, 2011, and he remembers it --  
14 receiving it then, which plaintiffs again showed to be untrue.

15           And then he sits for the hearing, and on  
16 cross-examination, plaintiffs prove that the Dave Kleiman  
17 e-mail is a forgery. It was sent from Craig's e-mail account,  
18 from a computer named for Craig's initials that was located in  
19 Australia. Its "from" field has been edited. Its "date"  
20 field has been edited. It's been sent from and created by  
21 software that didn't exist in 2011. It's actually a  
22 modification of an e-mail that was sent in October 17th, 2014.  
23 Plaintiffs proved that based on a document I.D., the metadata  
24 showing Thursday, when it was really a Friday, the fact that  
25 they actually -- we actually have the October 17th, 2014,

1 e-mail, sent the same day Dr. Wright bought Tulip Trading from  
2 Denis Myakka, at Abacus Offshore.

3 In fact, Dr. Edman testified that other documents  
4 produced were also created from this same forged document.  
5 And as testified by Dr. Edman, the cryptographic signature it  
6 includes in the Dave Kleiman trust documents that purports to  
7 be Dave Kleiman was actually used by someone well after Dave  
8 died, thus demonstrating that Dave was not the one in sole  
9 possession of that key.

10 Plaintiffs then proved that 2012 Tulip Trust I  
11 document was a forgery also. It contains five embedded font  
12 files copyrighted by and digitally signed by Microsoft in  
13 2015.

14 It names Tulip Trading as a beneficiary, which is an  
15 aged shelf company we proved Craig didn't even purchase until  
16 2014. And the HIGHSECURED invoice submitted by Dr. Wright as  
17 proof of transaction history is a forgery, too. It's been  
18 heavily modified using the same techniques as some of those  
19 other forgeries. In fact, Your Honor, Dr. Wright admits these  
20 documents are forgeries, but his defense is that he was hacked  
21 and set up.

22 Well, first, he's provided no proof of that, no  
23 evidence of that. He gave no testimony on that on redirect.  
24 He provided no other witness to talk about this, only the  
25 blatant, bald assertion that, I was hacked.

1           Second, if this Court's to believe that it wasn't  
2 Dr. Wright based on his mere statement that it wasn't him,  
3 that's an issue of credibility, and as best summed up by Judge  
4 Bloom, this witness has none.

5           Third, it came from his e-mail, his computer in  
6 Australia on the same day he bought Tulip Trading.

7           Your Honor, Dr. Wright is dishonest, and he doesn't  
8 hesitate to make misrepresentations about documents that he  
9 has forged while sitting right there before this Court.

10           On cross-examination, Dr. Wright was presented with  
11 Bitmessages that he produced that are purportedly between him  
12 and Dave Kleiman but are dated November 6, 2012, and some  
13 dated earlier. Now, putting aside for a moment that the  
14 purported message between him and Dave conflicts and  
15 contradicts the amount of key slices that he claims he needs  
16 to access the coins, he testified that he remembered receiving  
17 it around November 6, 2012. He then expressly denied that it  
18 was a forgery when he was asked. But he knows it's a forgery,  
19 because as testified to by the creator of Bitmessage himself,  
20 it's a forgery, and Bitmessage wasn't even available until  
21 November 19th, 2012. And yet Dr. Wright has produced multiple  
22 pages of Bitmessages that predate its release. He is a serial  
23 forger.

24           Plaintiffs' examination showed that almost every one  
25 of the Tulip I trustees are under Dr. Wright's control, thus

1 challenging his inability to open the file.

2           Number one, Coin LTD, UK. There are public UK  
3 records showing Dr. Wright was a director.

4           Uyen Nguyen, plaintiffs have shown in other  
5 proceedings before the district court that she was a  
6 mouthpiece for Dr. Wright.

7           Craig Wright obviously controls himself.

8           Dave Kleiman.

9           Panopticopt. Dr. Wright said his wife controls it.  
10 His blog post says he controls it.

11           Savanah. Dr. Wright's e-mails and communications  
12 show that he controls Savanah.

13           And the PGP key I.D., as he admits, are controlled  
14 by him.

15           So he controls six out of the seven trustees that he  
16 swore in his affidavit: Myself and a combination of trustees  
17 referenced in Tulip Trust I to unlock based on a Shamir scheme  
18 can open the files.

19           So Dr. Wright shifts again. He now claims the trust  
20 documents are meaningless legal wrappers, and that he couldn't  
21 access the Bitcoin, because, in complete conflict with his  
22 testimony earlier at his first deposition, that Dave Kleiman  
23 knew nothing about the setup of the trust, and that Dave did  
24 not even know what he had. He testifies now that it was Dave  
25 who convinced him not to destroy the Bitcoin, Dave who was in

1 charge of the key slices, and Dave who set up the entire  
2 system for returning the slices to Craig, all done in a way  
3 where Dr. Wright can't know who has the keys to billions of  
4 dollars worth of Bitcoin he stole from his deceased partner.

5 Now, Your Honor, the problem with not telling the  
6 truth is that it gets hard to keep track of what story you've  
7 told, and there are numerous documents and statements from  
8 Dr. Wright reflecting how many key slices are necessary to  
9 access the purported encrypted file: Eight of 15, 12 of 15, 3  
10 of 5. And, of course, it's well known that he already signed  
11 with block 9 for Gavin Andresen.

12 So to explain these discrepancies, Dr. Wright  
13 fabricates a new lie, a Genesis block file, a seed file, a 1  
14 of 10 file, 1 through 10 file. Of course, none of these  
15 statements are included in his sworn declaration that was  
16 supposed to be hypersensitive and 100 percent accurate. In  
17 fact, Your Honor, no one has seen this mysterious file. It  
18 has not been produced to the plaintiffs in litigation, in  
19 discovery. It has not been produced to our expert. No expert  
20 from Dr. Wright has testified about this file. Even  
21 Mr. Shadders himself, who came here to reconstruct it,  
22 admitted that he has not seen this mysterious file.

23 And, Your Honor, I want to take a minute to talk  
24 about Mr. Shadders' list. It's only something like 60 percent  
25 accurate, which makes it useless. It's based on 12 hours of

1 work, it's based on research that was conducted years earlier,  
2 and it's missing well-known Satoshi addresses.

3 THE COURT: Well, when you say it's only 60 percent  
4 accurate, what do you mean? You mean -- are you saying he  
5 didn't accurately apply the criteria that he said he was going  
6 to apply, or --

7 MR. FREEDMAN: No. Mr. Shadders said that it has  
8 a -- an inaccuracy rate of -- because it's overinclusive. It  
9 has something like 1600 -- how many -- do you remember how  
10 many addresses are --

11 THE COURT: 27,000.

12 MR. FREEDMAN: 27,000, and I am not good at math,  
13 Your Honor, but it should be 800 -- 800,000 divided by 50 or  
14 so.

15 THE COURT: Well, I think the testimony was that it  
16 over -- that it was overinclusive by approximately 500,000  
17 Bitcoin. That doesn't make it inaccurate, it just makes it  
18 overinclusive.

19 MR. FREEDMAN: Well, but then it makes it useless  
20 for the plaintiffs, because at any address, Dr. Wright can  
21 just say, oh, that's one of the inaccurate ones.

22 THE COURT: Okay. I just wanted to make sure if I  
23 was missing some data that said something Mr. Shadders had  
24 done incorrectly.

25 MR. FREEDMAN: No. Well --

1 THE COURT: You're saying he applied the -- you  
2 don't contest that he applied the criteria that he testified  
3 he applied and he got the outcome he got, you just say the  
4 outcome is not helpful.

5 MR. FREEDMAN: With the exception of what he  
6 admitted on the stand that he had misapplied, that's right,  
7 yeah.

8 THE COURT: Okay.

9 MR. FREEDMAN: Correct.

10 THE COURT: I just wanted to make sure. I'm sorry  
11 to interrupt your argument. Go ahead, please.

12 MR. FREEDMAN: Your Honor, the evidence demonstrated  
13 that Dr. Wright has willfully, and in bad faith, refused to  
14 comply with this Court's order. His story changes by the day,  
15 and when ordered to produce documents to back up his  
16 deceptions, he brazenly submits forgeries to this Court to  
17 substantiate his claims that the Bitcoin he took were locked  
18 in trust, but they aren't. Dr. Wright is willfully refusing  
19 to comply with this Court's order, and this Court should see  
20 through his deceptions and forgeries.

21 Now, with that background in place, Your Honor, I'd  
22 like to transition to remedies and the standards to be  
23 applied, and specifically to a case I found very helpful,  
24 which was Costa versus Datapro. It's -- the cite is 2011  
25 Westlaw 7318760, and it's a report and recommendation authored

1 by Judge Goodman that was adopted by Judge Graham.

2           And this case has a lot of parallels to ours. There  
3 is a defendant that failed to produce documents per a court  
4 order; a defendant that committed perjury. There was no due  
5 diligence conducted. There was the fact that the defendant --  
6 the Court mentions, why would you fight to produce these --  
7 these documents if you -- if they don't exist -- and the  
8 defendant ended up claiming that they didn't exist. If they  
9 don't exist, why would you fight so hard not to produce them?  
10 There were shifting positions. The defendant shifted his  
11 position back and forth. And there was the failure to state  
12 that he simply didn't have the documents for many months.

13           And there were parallels in what the Court did. The  
14 Court issued several orders, just like this Court. The Court  
15 ordered a redeposition, just like this Court. They were  
16 warned about potential sanctions, just like this Court. And  
17 the extension of the discovery -- the discovery period was  
18 extended there, as well.

19           And in that case, Judge Goodman recommended that the  
20 pleadings be stricken where the defendant misrepresented  
21 several key facts at deposition and violated the Court order.

22           But first is the burden, and this Court mentioned it  
23 before. Once the moving party, which is us in this case,  
24 makes a prima facie showing of a discovery violation, the  
25 nonmovant, which is Dr. Wright, must show that it was

1 impossible to comply with the relevant court order to avoid  
2 sanction.

3           And there are generally three requirements before a  
4 court will impose severe sanctions under Rule 37 for willful  
5 discovery violations: The party's failure to comply is  
6 willful or in bad faith; the failure is prejudicial; and a  
7 lesser sanction would fail to adequately punish and ensure  
8 compliance with the Court's order.

9           And here, we are not confronted with an act of  
10 negligence in failing to comply with the Court orders. The  
11 record demonstrates that Dr. Wright's noncompliance is an  
12 intentional, contrived pattern of behavior.

13           And, Your Honor, the Costa case that I've just cited  
14 makes it clear that past conduct is relevant for the bad faith  
15 analysis to show that it was in bad faith the noncompliance,  
16 to show that a lesser sanction -- you know, past conduct is  
17 also relevant to show that a lesser sanction just won't do.  
18 And past behavior is also relevant to show credibility; that  
19 Dr. Wright is the only one who says that it is impossible for  
20 him, and he should not be trusted.

21           Your Honor, Dr. Wright is not a first-time offender  
22 in this case. In fact, it came to the plaintiffs' attention  
23 this morning that Dr. Wright has been sanctioned by a court in  
24 Australia that we've just found out for refusal to comply with  
25 orders, and we just haven't had time to gather that evidence

1 yet.

2 THE COURT: I'm not going to consider that. That's  
3 not in the record before me.

4 MR. FREEDMAN: Your Honor, the first time he tried  
5 to commit a fraud on this Court is in his first motion to  
6 dismiss, when he swore he had nothing to do with W&K.  
7 Plaintiffs thought that after they exposed that, that would be  
8 the end of it, but they were wrong. He tried to do it again  
9 in a second motion to dismiss, when he swore that all the  
10 Australian tax documents were in Australia in supported of his  
11 forum non conveniens motion and later withdrew that in  
12 discovery saying he didn't have to go to Australia because he  
13 had all the documents.

14 He did it again, when, at his deposition and under  
15 oath, he claimed that he couldn't answer certain questions  
16 pursuant to United States national security, only withdrawing  
17 it when this Court told him to go get the United States to  
18 join his objection, and then the -- then the objection  
19 transformed into a Craig Wright personal security objection.

20 And then in April, Dr. Wright filed a motion for  
21 judgment on the pleadings and supported the motion with two  
22 forgeries that needed to be withdrawn by his own attorneys  
23 because, to their credit, after the public had exposed them as  
24 forgeries, they needed to acknowledge to this Court that they  
25 could not substantiate the authenticity of those two exhibits.

1           Your Honor, Judge bloom said it best when she denied  
2 Dr. Wright's motion and quoted Sir Walter Scott's 19th-century  
3 novel Marmion: "Oh! What a tangled web we weave when first  
4 we practice to deceive." In fact, Judge bloom went even  
5 further, finding that, quote: "Unfortunately, the record is  
6 replete with instances in which the defendant has proffered  
7 conflicting sworn testimony before this Court. In weighing  
8 the evidence, the Court simply does not find the defendant's  
9 testimony to be credible."

10           Your Honor, I go through all of the above, because  
11 we believe this Court should impose a severe sanction and  
12 strike Dr. Wright's pleadings. There is no doubt that this is  
13 a drastic sanction, and before it's imposed, the Court has to  
14 consider whether lesser sanctions can adequately address the  
15 defendant's conduct. And as this Court is aware, the  
16 administration of justice in our system requires that parties  
17 comply with certain basic norms. They must produce documents  
18 relevant to the dispute; they must testify truthfully; they  
19 must not -- they must not manipulate or otherwise forge  
20 documents. If these safeguards are violated, the ability of  
21 our system to deliver justice is gone.

22           As stated by Judge Cone (sic) before he entered  
23 default for perjury in the Sprint Sols case in 83 F.Supp.3d  
24 1290: "Our legal system is dependent upon the willingness of  
25 the litigants to allow an honest and true airing of the real

1 facts."

2 Dr. Wright has told this Court repeatedly through  
3 his conduct that he has no intention of playing by the rules.  
4 He has submitted false affidavits; he has submitted fraudulent  
5 documents; he has testified one way, only to later take  
6 positions that are 100 percent at odds with that sworn  
7 testimony.

8 And what has he done in response to our orders  
9 regarding his Bitcoin holdings list? He relied on obviously  
10 forged documents, changed his story repeatedly as new  
11 circumstances developed and otherwise concocted a story that,  
12 quite frankly, Your Honor, makes no sense.

13 Now, I expect that Dr. Wright will tell this Court  
14 that the strikings of his pleading is too drastic a remedy;  
15 that something less will do. But it won't. Many courts in  
16 the Southern District of Florida have recognized that and  
17 entered default in the face of forged evidence. To quote the  
18 Eleventh Circuit on this issue, there is, quote: "No sanction  
19 short of striking of the answer to adequately address the  
20 issue of fabricated evidence." That's the Forsberg case at  
21 634 F.App'x, at 680.

22 That's because, Your Honor, as Judge Ryskamp held in  
23 the Vargas case, which had very similar facts to ours, in that  
24 in Vargas, the plaintiff had alleged that the defendant had  
25 sexually harassed her, and that he had given her a pair of

1 undergarments and a picture and said to her, I want you to  
2 pose in these undergarments like this picture. And at the  
3 deposition, the plaintiff pulled these undergarments out of  
4 her purse, and she said these were the undergarments he gave.

5 And a subsequent investigation into these  
6 undergarments revealed that they were not manufactured until  
7 after the time that the plaintiff alleged this had occurred,  
8 just like the software in the case simply didn't exist at the  
9 time when Dr. Wright claims these messages were actually sent.

10 And in Vargas, Your Honor, Judge Ryskamp held: "If  
11 manufactured evidence is merely excluded while the lawsuit  
12 continues, litigants would infer that they have everything to  
13 gain and nothing to lose by continuing to falsify evidence.  
14 Indeed, allowing a defendant" -- and this is going back to  
15 Sprint, with Judge Cone (sic).

16 THE COURT: Cohn.

17 MR. FREEDMAN: Cohn, thank you.

18 Allowing a defendant who has demonstrated comfort  
19 with fabricating testimony to continue to offend against a  
20 claim, quote, would only provide such defendant with further  
21 opportunities to subvert the integrity of the judicial  
22 process. No less drastic sanction will remedy the situation.  
23 Dr. Wright's pleadings should be stricken. He will not play  
24 by the rules. He will continue to fabricate and lie and  
25 provide evidence before this Court and put plaintiffs in a

1 position where they simply cannot prosecute this case.

2 That said, the Court asked us to be prepared to  
3 discuss other remedies, so I will do that. But I just want to  
4 be clear for the record that plaintiffs' position is that  
5 Dr. Wright's pleadings should be stricken is not only  
6 justified, it is necessary to bring this case to a fair and  
7 just resolution.

8 THE COURT: Okay. Before you leave that, however --  
9 because your position in your written document was that the  
10 proper remedy was to declare that the 1,100,000 Bitcoin is  
11 joint property belonging equally to Dr. Wright and Dave  
12 Kleiman. So you're -- you are asking for a more severe remedy  
13 than that at this time.

14 MR. FREEDMAN: Your Honor, that request was made  
15 before the evidence of all the forgeries were submitted to the  
16 Court, before we were aware of the full extended of the fraud  
17 being perpetrated by the defendant.

18 THE COURT: Okay. I just wanted to clarify that you  
19 were asking for a more severe sanction. I just wanted to be  
20 clear.

21 MR. FREEDMAN: Yes, Your Honor.

22 THE COURT: Okay.

23 MR. FREEDMAN: We've had a long discussion about  
24 this, and we just don't know how to move forward at this  
25 point, because nothing -- we can't trust anything that's been

1 handed to us, and the defendant has no integrity.

2 THE COURT: Okay. So you were starting to say there  
3 were other --

4 MR. FREEDMAN: Your Honor, you asked us for  
5 different --

6 THE COURT: No, I mean, you can ask for whatever  
7 remedy you want to ask for. You don't have to ask for less  
8 than you want. It doesn't mean you're going to get it, but  
9 you don't have to ask for less than you want.

10 MR. FREEDMAN: I will -- if the Court allows me, I  
11 will discuss an alternative remedy.

12 THE COURT: Sure.

13 MR. FREEDMAN: Rule 37 allows the Court to consider  
14 remedies short of striking the pleadings, and I want to focus  
15 on two of those specifically, 37(b)(2)(A)(i) and  
16 37(b)(2)(A)(ii). And they allow for the following remedies  
17 for the violation of a court order, which is: Directing that  
18 the matters embraced in the order or other designated facts be  
19 taken as established for purposes of the action as the  
20 prevailing party claims, and prohibiting the disobedient party  
21 from supporting or opposing designated claims or defenses or  
22 from introducing designated matters in evidence.

23 Each of these remedies, Your Honor, seeks to achieve  
24 this same goal, which is that a party cannot use its own  
25 violation of a court order as a sword in support of its own

1 prosecution or defense in a case. Here, the Court's orders  
2 and the discovery that is the subject of those orders goes to  
3 the heart of plaintiffs' case. As this Court is aware, much  
4 of plaintiffs' claim revolves around the allegation that Dave  
5 Kleiman and Craig Wright jointly mined and held Bitcoin  
6 together. And although there are different numbers contained  
7 in different documents, Dr. Wright himself has admitted that  
8 he was holding 300,000 Bitcoin in trust for Dave at the time  
9 of his death. That's exhibit 14 to the second amended  
10 complaint.

11           And while Dr. Wright testified exactly the opposite  
12 at this hearing, plaintiffs have shown this Court an e-mail  
13 that Dr. Wright sent to Ira before the lawsuit, where  
14 Dr. Wright writes that it was Dave who held Bitcoin in  
15 50-Bitcoin-sized addresses and Craig who held his Bitcoin in  
16 large addresses. Inexplicably, Dr. Wright is now claiming  
17 that he kept his Bitcoin in 50-Bitcoin-size addresses and is  
18 refusing to tell plaintiffs which addresses those are.

19           Dr. Wright now denies that he and Dave mined any  
20 Bitcoin together, and he is also denying that he is holding  
21 any Bitcoin for Dave in trust or anywhere else. In other  
22 words, the location, which in Bitcoin terms is the public  
23 addresses of these Bitcoin, is a central issue in this case,  
24 and to prove our claims, plaintiff sought the public addresses  
25 of Dr. Wright's Bitcoin, or a listing in order to identify

1 them.

2           And as Dr. Wright himself has stated, Bitcoin's  
3 public ledger tracking the movement of every Bitcoin in  
4 existence is an immutable evidence trail. The parties have  
5 already litigated the relevance of this information, and this  
6 Court has unequivocally ruled that it is highly relevant to  
7 plaintiffs' claims.

8           Dr. Wright claims that he hasn't moved the Bitcoin,  
9 but we have no one to believe for that, other than his own  
10 word, which can't be trusted. And he has specifically said  
11 the opposite in e-mails to Ira Kleiman, where he said that he  
12 had his Bitcoin in large addresses.

13           Your Honor, the 70 addresses provide by Dr. Wright  
14 is really nothing new. He claimed to be Satoshi Nakamoto.  
15 Everyone knows Satoshi Nakamoto mined the first 70 or so  
16 addresses.

17           Dr. Wright has refused to give up this information,  
18 even though the overwhelming evidence shows that it is readily  
19 accessible to him. His claim that he cannot comply with the  
20 Court's order is not credible, and he has decided he will not  
21 give up the keys to billions of dollars in Bitcoin. The  
22 reason for that can only be explained by the conclusion that  
23 providing this information will show that Dr. Wright has taken  
24 billions of dollars in Bitcoin from Dave.

25           If Dr. Wright's not telling the truth and the

1 Bitcoin have in fact moved, it would be extraordinarily  
2 relevant to plaintiffs' claims. That's how we would drill  
3 down on where they are, where they went, who has them, who  
4 else knows about them.

5           Since Dr. Wright is depriving plaintiffs of their  
6 ability to prove key components of their claims, any remedy  
7 must correct that. And, therefore, plaintiffs are requesting  
8 in the alternative if this Court won't strike Dr. Wright's  
9 pleadings the following:

10           Pursuant to Rule 37(b) (A) (i) (sic), the Court should  
11 order that the allegations in plaintiffs' second amended  
12 complaint regarding ownership of the Bitcoin at issue be  
13 deemed admitted. Specifically, plaintiffs request the  
14 following paragraphs of the second amended complaint be  
15 established for purposes of the case.

16           I have a copy of the second amended complaint if it  
17 would help the Court, or I can just give you the --

18           THE COURT: I have it here electronically, but if  
19 you want to tell me the paragraphs you're asking.

20           MR. FREEDMAN: It's -- and I don't -- unless the  
21 Courts wants, I don't need to go through them. It's just  
22 65 --

23           THE COURT: No. Make your record, please.

24           MR. FREEDMAN: Sixty-five, 88, 92, 93, 94, 95, 111,  
25 112 and 116.

1           An order deeming these matters admitted is the  
2 minimal remedy necessary to address Dr. Wright's willful  
3 violation of this Court's orders, the result of which is  
4 serious damage to plaintiffs' ability to prove critical  
5 elements of their case that relate to the joint Bitcoin  
6 holdings.

7           Similar to the above, and pursuant to 37(a) -- I  
8 have lost -- (b) (2) (A) (ii), plaintiffs additionally request  
9 that this Court preclude Dr. Wright from offering any evidence  
10 or otherwise seeking to deny that any of the factual  
11 allegations plaintiffs seek to admit through the paragraphs we  
12 just went through.

13           Now, plaintiffs are mindful that the sanctions we  
14 are requesting are severe, but Dr. Wright's intentional  
15 conduct and the damage it has done to plaintiffs' ability to  
16 prove this case warrants them.

17           And just because the Court has asked for us to be  
18 open-minded about remedies, at a minimum, plaintiffs would  
19 request that the Court enter a sanction under  
20 Rule 37(b) (2) (A) (i) that the following single designated fact  
21 be taken as established for the purposes of this action: Dave  
22 Kleiman owns some of the Bitcoin held in the Tulip Trust, and  
23 leave it to the jury to determine how much that is.

24           Again, Your Honor, I just want to stress that it is  
25 our position that his pleadings should be stricken, because we

1 cannot prosecute this case in this manner. But should the  
2 Court not be willing to do so, these remedies, in addition to  
3 the remedies we requested in our motion, are what plaintiffs  
4 are asking this Court to do.

5 THE COURT: I assume you want your attorney's fees,  
6 too.

7 MR. FREEDMAN: That'd be great, Your Honor.

8 THE COURT: I thought so. Okay.

9 MR. FREEDMAN: But I -- one thing I do want to point  
10 out, Your Honor. The case is -- has a value of many billions  
11 of dollars, and plaintiffs -- while plaintiffs want attorney's  
12 fees, it's not an attorney's -- the attorney fees is not  
13 enough in this case. It's simply not enough. Because if you  
14 steal billions of dollars, and you pay even a million dollars  
15 in attorney's fees, it's just not a deterrent, and it's a  
16 great deal, Your Honor. It's the best sale ever invented.

17 THE COURT: I understand.

18 But let me ask you, address if you would,  
19 Ms. McGovern makes the good argument, right? Why would he  
20 risk it? If he really can turn all this information over,  
21 they've got other defenses. They've got defenses that Dave  
22 Kleiman gave his shares in Bitcoin to Dr. Wright in return for  
23 corporate shares. They've got other -- they've got res  
24 judicata defenses. They've got statute of limitations.  
25 They've got lots of other defenses. What's the motivation

1 here? Why wouldn't he? He's taking a big risk.

2 MR. FREEDMAN: Because all those defenses, Your  
3 Honor, are paper walls. The contract that purportedly  
4 evidences that Dave Kleiman signed his shares away is a fake  
5 signature from a computer-generated font that has no proof  
6 that Dave Kleiman ever signed it.

7 Dr. Wright has admitted via e-mail to Craig -- to  
8 Ira that at least 300,000 Bitcoin held in the trust belong to  
9 Dave. The -- he has told the Australian tax office in  
10 transcripts that some of the Bitcoin held in trust belong to  
11 Dave Kleiman. He's going to face a severe uphill battle. And  
12 if he adds on top of that the list of Bitcoins -- he's told --  
13 he's told Ira before litigation that Dave was the one who held  
14 his Bitcoin in 50-Bitcoin-sized wallets, and he was the one  
15 who had large Bitcoin wallets, and now he's completely  
16 flipped, and he's saying that list of 50-Bitcoin-sized  
17 wallets, it's mine. And if the jury sees that list, they're  
18 going to award it to Dave Kleiman's estate.

19 THE COURT: Okay.

20 MR. FREEDMAN: And he doesn't want that to happen.

21 THE COURT: Okay.

22 MR. FREEDMAN: And he came here, and he submitted  
23 forged evidence, and he gave perjurious testimony in an attempt  
24 to persuade the Court, hoping -- because he's done this for a  
25 long time, Your Honor -- that somebody wouldn't see through

1 it. And thankfully we have people on our team, like Dr. Edman  
2 and others, who are able to digitally analyze these documents  
3 and expose them for the forgeries they are.

4 THE COURT: All right. Thank you, Mr. Freedman.  
5 Anything further?

6 MR. FREEDMAN: No, Your Honor.

7 THE COURT: All right. Thank you.  
8 Ms. McGovern?

9 MS. MCGOVERN: Yes, Your Honor.

10 THE COURT: Please.

11 He argued exactly what you said he was going to  
12 argue. As I said, you're a very good lawyer.

13 MS. MCGOVERN: All right. I have a lot of notes  
14 here.

15 THE COURT: Go. Take as much time as you need.

16 MS. MCGOVERN: Thank you, Your Honor.

17 THE COURT: Sure.

18 MS. MCGOVERN: Game over is not fair. It's just not  
19 fair. We have a solid defense in this case, Your Honor, which  
20 is: You can't mine together during the relevant time period,  
21 and we're going to prove it.

22 We also have a solid defense that there are no  
23 documents that any reasonable man -- and I say that in the  
24 universal context -- would reach the conclusion that Dave  
25 Kleiman and Craig Wright had a 50/50 partnership deal where

1 everything that Craig Wright invented from the time he was 18  
2 years old, as a fairly eccentric, awkward kid in Australia, is  
3 now Dave Kleiman's. That just didn't happen, and we're going  
4 to prove it.

5 Most importantly, Craig Wright has the right in our  
6 system of justice to prove his defense.

7 There have been a lot of allegations that have been  
8 made today about perjury in this case on this issue before  
9 this Court. I was there both days, and it was very clear that  
10 there was no testimony about intent to defraud with the PDFs  
11 that were presented to the Court by Dr. Edman. He just didn't  
12 have the basis to reach that conclusion.

13 THE COURT: Oh, I wouldn't let him.

14 MS. McGOVERN: And you wouldn't let him.

15 So perjury? That didn't happen in this case on this  
16 issue before this Court.

17 With respect to the past conduct, which is -- which  
18 is a big gloss, that's a really wide shot across the bow.

19 And Mr. Freedman raised the issue of the motion to  
20 dismiss, and we understand that in challenging the Court's  
21 subject matter jurisdiction, the Court found what it found.  
22 But there have not been, in this case, on this issue before  
23 this Court, there have not been conclusions or proof that  
24 Dr. Wright is a fraudster, is a perjurer and has willfully  
25 failed to comply with this Court's order.

1           There is so much argument, that sometimes it's hard  
2 to distinguish between plaintiffs' enthusiasm for their very  
3 large case and the evidence that's been presented in front of  
4 this Court. But to that point I would say this: We're not  
5 done yet. There's still three months left, three and a half  
6 months left of discovery, and the Judge has allowed plaintiffs  
7 that additional time to discover this case. And whereas we  
8 opposed it initially, it's a good thing, because discovery is  
9 bringing in new information every single day.

10           We have not approached discovery in this case like a  
11 surgeon performing a delicate heart surgery. We haven't,  
12 because we can't, and we talked to the Court about that from  
13 the very beginning. There are a lot of corporations, there  
14 have been so many documents, and we did not discriminate in  
15 forensically imaging those and getting our production as close  
16 to done as possible before that first discovery deadline. We  
17 turned over things, and I believe Your Honor recognized, some  
18 good, some bad. We didn't discriminate. We just produced it  
19 in good faith if it was requested.

20           I hesitate to even touch upon in referring to this  
21 miscommunication and perhaps misunderstanding with respect to  
22 this issue, but when I refer to discovery coming in every day  
23 and new discovery coming in every day, I'm really not kidding.  
24 I mean, we -- we've received information in discovery, which  
25 we are vetting now much more carefully. We're not -- as

1 everybody keeps telling us, it's a marathon, not a sprint,  
2 even if sometimes you feel like it's a sprint.

3 And some of that information that's come in, we  
4 don't know exactly how it's going to come in, but it includes  
5 Dave's public addresses. I'm surprised plaintiffs haven't  
6 mentioned that.

7 MR. FREEDMAN: Objection, Your Honor. This is not  
8 in the record.

9 THE COURT: It's not in the record.

10 MS. McGOVERN: I only raise discovery is ongoing,  
11 because I believe the remedies that have been requested here  
12 are beyond reasonable in our American court system. I don't  
13 think what has happened here should result in a windfall to  
14 plaintiffs.

15 The paragraphs that they would like to be declared  
16 adjudicated, the facts in those paragraphs they ask this Court  
17 to take away from our federal jury system are beyond  
18 incredible and frightening if, in fact, under these facts and  
19 this record they believe that's justified. It includes  
20 allegations of a general partnership, joint mining, ownership.  
21 It's the whole kit and caboodle. It is: We asked for  
22 discovery; we win.

23 Your Honor, the arguments that were made before you  
24 just now are almost as though discovery were closed and trial  
25 is very, very soon, and the prejudice is absolute, but I

1 didn't hear what the prejudice with respect to the failure to  
2 provide the public addresses actually was. And if that  
3 information is provided, and even under our belief it wouldn't  
4 be by December 3rd, but it would be by January 31st, does that  
5 mean that those requested sanctions by plaintiffs' counsel are  
6 justified? What happens then? What happens if the discovery  
7 that is not complete, and by all accounts, and I think any  
8 lawyer that practices this type of litigation would say, a lot  
9 can be done in three and a half months.

10 We haven't even taken a deposition. We haven't  
11 taken one merits deposition. We haven't even deposed Ira  
12 Kleiman about Dave's devices, and we haven't had the ability  
13 to fully inquire over why those devices, when litigation was  
14 imminent, were wiped out. We haven't even had an opportunity  
15 to do that, and yet plaintiffs have just asked the Court to  
16 determine that they've won the case.

17 Let the plaintiffs present all of that argument to  
18 the jury. If they feel so strongly about those things, they  
19 should feel very good about their case. But that doesn't mean  
20 we don't or we lose ours. Let the process complete itself.  
21 Let discovery close, and let the opportunity for the  
22 information by the end of January to play out before these  
23 types of rulings or considerations regarding plaintiffs'  
24 request, even if they were warranted, be even considered in  
25 light of the gravity and the message they carry.

1           There was, Your Honor, not a determination with  
2 plaintiffs' expert on August 5th that Dr. Wright forged any  
3 documents. And the June 2011 e-mail, if you recall the  
4 diagram with the red line and the electronic file, they didn't  
5 prove that was forged. I think specifically it was -- the  
6 question was: You can't get there from here, can you?

7           THE COURT: Well, I think your argument was you  
8 can't tell whether it was a 2014 document that was modified to  
9 look like a 2011 document, or a 2011 document that was  
10 modified to look like a 2014 document.

11           MS. McGOVERN: Yes.

12           THE COURT: And Dr. Edman agreed with you.

13           MS. McGOVERN: And he agreed. PDFs change every  
14 time you save them.

15           To reach conclusions in this technical kind of a  
16 case without a full record before the Court is premature and  
17 dangerous and unnecessary. There's time to sort this out, and  
18 I do not believe -- I think there is a very loose referral to  
19 past conduct as a way to justify the kind of sanctions that  
20 they've requested here, and I think the reason for that  
21 reliance is because of the absence of evidence regarding the  
22 willful noncompliance.

23           Your Honor, we appreciate your time.

24           THE COURT: Thank you very much, Ms. McGovern.

25           All right. Counsel, it's 3:10. I'm going to take a

1 recess until 3:30, and then I'll be back. So we'll be in  
2 recess 'til 3:30.

3 (A recess was taken from 3:12 p.m. to 3:29 p.m., after  
4 which the following proceedings were had:)

5 THE COURT: All right. Good afternoon, everyone.  
6 Please have a seat.

7 All right. So the matter is before the Court today  
8 on the plaintiffs' motion to compel at docket entry 210 and  
9 the Court's order dated June 14th at docket entry 217.

10 I have considered the totality of all the docketed  
11 filings in this case, including the pleadings and transcripts  
12 of the prior -- relating to the prior hearings in this case.  
13 And as the judicial officer who presided at those proceedings,  
14 I retain a current and independent recollection of the events.

15 I have also reviewed all the exhibits introduced  
16 into the record at the hearing, including the deposition  
17 excerpts that were filed in the record.

18 And I've carefully considered the very fine  
19 arguments this afternoon of all counsel. I'm fully advised,  
20 and I'm ready to make a decision.

21 Two preliminary points:

22 First, I am not required to decide, and I do not  
23 decide, whether Dr. Wright is Satoshi Nakamoto. I also am not  
24 required to decide, and I do not decide, the amount of  
25 Bitcoin, if any, that Dr. Wright controls today. For purposes

1 of this proceeding, I accept Dr. Wright's representation that  
2 he controlled, directly or indirectly, some Bitcoin on  
3 December 31st, 2013, and that he continues to control some  
4 today.

5           This case arises from a dispute over the ownership  
6 of Bitcoin and Bitcoin-related intellectual property. The  
7 second amended complaint alleges that Dr. Wright and David  
8 Kleiman were partners in the creation of Bitcoin cyber  
9 currency, and that they mined, or, that is, acquired a  
10 substantial amount of that currency together. Dr. Wright  
11 denies that a partnership existed with David Kleiman, and he  
12 further denies that David Kleiman has any ownership interest  
13 in any Bitcoin that was mined by Dr. Wright.

14           Alternatively, Dr. Wright asserts that David Kleiman  
15 transferred any interest he had in that Bitcoin and  
16 intellectual property to Dr. Wright in exchange for equity in  
17 a company that ultimately failed.

18           David Kleiman died in 2013.

19           As early as July of 2018, the plaintiffs in this  
20 case sought discovery to identify the amount of Bitcoin that  
21 Dr. Wright owns and controls, starting with Ira Kleiman's  
22 first set of interrogatories in July of 2018, as well as the  
23 plaintiffs' first request for production. Dr. Wright  
24 interposed legal objections because those requests asked not  
25 just for a listing of the coin, but also for other documents

1 and materials well beyond the scope of simply a list of  
2 Bitcoin.

3           As was discussed earlier today, we had a number of  
4 discovery hearings, and on March 14th, I ruled that Dr. Wright  
5 was required to provide, quote, a listing of all Bitcoin that  
6 was owned by him -- I'm sorry. I ruled that Dr. Wright should  
7 provide a listing of his Bitcoin, and I asked: How difficult  
8 would it be to come up with this information? I assume it's  
9 just a list of Bitcoin wallets from December 2013, end quote.

10           Admittedly, Dr. Wright's counsel probably wasn't  
11 prepared for that question, hadn't had a chance to talk to  
12 their client, but the answer was: Well, it's a list -- it  
13 would be a list of public addresses, but it would identify  
14 Craig Wright as being the owner of these addresses, end quote.

15           So I ruled, although it wasn't reduced to writing,  
16 that Dr. Wright should provide a listing of his Bitcoin  
17 holdings. My ruling was not limited to a list of public  
18 addresses. I did not set a deadline for the filing of the  
19 motion, nor did I set a date for the production.

20           On April 4th, Dr. Wright was deposed. During his  
21 deposition an issue came up relating to testimony and  
22 questions relating to his Bitcoin holdings. The parties got  
23 me on the phone, as I -- we had agreed would be the procedure.  
24 I think as I recall -- I haven't had a chance to review that  
25 particular transcript, but as I recall, there was some

1 misunderstanding, perhaps, about when Dr. Wright would be  
2 filing his motion for protective order. I believe Ms. Markoe  
3 testified or said on the call that there had -- she understood  
4 there had been an agreement with counsel for -- that it  
5 wouldn't be filed before the deposition, and so I deferred  
6 ruling on that. No harm, no foul. I deferred ruling, and I  
7 said that Dr. Wright could file a motion for protective order.

8           At a subsequent discovery hearing on April 11th, I  
9 set a deadline of April 19th for any motions relating to  
10 Dr. Wright's Bitcoin holdings in my March 14th order.

11           On March 18th, Dr. Wright's counsel filed a sealed  
12 motion regarding production of a list of public addresses of  
13 Bitcoin, which we've talked about today. It was in that  
14 motion that it was represented to the Court and to opposing  
15 counsel that, quote: In 2011, Dr. Wright transferred  
16 ownership of all of his Bitcoin into a blind trust.  
17 Dr. Wright is not a trustee or a beneficiary of the blind  
18 trust, end quote.

19           The defendants -- I'm sorry, the plaintiffs filed  
20 their response to that motion and asked me to order Dr. Wright  
21 to comply with my March 14th order, which I did. And I noted  
22 in my order that, quote: The argument that Dr. Wright is  
23 incapable of providing an accurate listing of his current or  
24 historical Bitcoin holdings was never presented in any of the  
25 prior hearings before this Court. Once again, I did not order

1 him to produce a list of public addresses, I ordered a listing  
2 of his Bitcoin holdings. And I set some deadlines for the  
3 production of materials relating to the trust, including a  
4 sworn declaration from Dr. Wright as to the identity of the  
5 trustees and other things.

6 At defense counsel's request, I gave an extension of  
7 time for them to go to London so that they could meet in  
8 person with Dr. Wright to make sure that whatever was filed  
9 was fully accurate. Dr. Wright provided a sworn declaration  
10 on May 8th, swearing that he'd met with counsel on May 7th  
11 and 8th, and representing that he was a trustee of the Tulip  
12 Trust, which was inconsistent with the motion that had been  
13 filed three weeks earlier, and for the first time stating that  
14 there was an encrypted file that contained the public  
15 addresses and their associate private keys, and that that  
16 could only be accessed by a -- keys obtained by Dr. Wright and  
17 a combination of the trustees under a Shamir scheme.

18 Plaintiffs then filed a motion to compel, which is  
19 the motion that brings us here today, asking for sanctions  
20 under Rule 37. And I noted after we had oral argument on that  
21 and Ms. McGovern, rightly so, requested that Dr. Wright be  
22 given an opportunity to testify and explain, since he was the  
23 person most knowledgeable, I set a hearing so that Dr. Wright  
24 could testify, and that was the hearing that we held on June  
25 the 28th.

1           So that's what brings us here today. I heard the  
2 testimony on June 28th, the testimony of Dr. Wright,  
3 Mr. Shadders, Dr. Edman, and the additional deposition  
4 transcripts that were offered outside of the hearing.

5           So before the Court are a couple of legal  
6 principles. One is Rule 37 of the Federal Rules of Civil  
7 Procedure, which authorizes the Court to award attorney's fees  
8 against a party and/or the party's counsel as a sanction for  
9 certain discovery-related conduct. The sanction can be  
10 attorney's fees. They can also be what I will call  
11 substantive sanctions, such as Mr. Freedman discussed in his  
12 remarks, deeming facts to be proven, prohibiting certain  
13 defenses, striking pleadings, and everything up to and  
14 including a default judgment.

15           The burden of proof under Rule 37 is a preponderance  
16 of the evidence, meaning more likely than not. The purpose of  
17 Rule 37 sanctions is to compensate the Court and other parties  
18 for the added expense caused by discovery abuses, to compel  
19 the discovery, to deter others from engaging in similar  
20 conduct, and to penalize the offending party. There's wide  
21 discretion in the district court to impose sanctions.

22           The most severe sanctions are usually only imposed  
23 upon a finding that a party's failure to comply with a order  
24 was willful or the result of bad faith, that the paper seeking  
25 sanctions was prejudiced, and that a lesser sanction would

1 fail to adequately punish and be inadequate to ensure  
2 compliance with court orders.

3           In a situation like the one we have here, that a  
4 party asserts they are unable to comply with a court order,  
5 the person seeking sanctions has an initial burden to show  
6 prima facie that the other party has failed to comply with the  
7 order. Once that showing is made, the party then who is  
8 claiming impossibility bears the burden by a preponderance of  
9 the evidence to show that compliance is impossible and that  
10 they will -- and that they have employed the most utmost  
11 diligence in discharging their responsibilities under the  
12 order; that they have, in good faith, undertaken all  
13 reasonable efforts to comply.

14           I also have before me a request or at least  
15 consideration of contempt. Whereas here the parties have not  
16 consented to have me preside over this case, I cannot hold  
17 someone in civil contempt or indirect criminal contempt.  
18 Instead, if the person's conduct in my opinion constitutes an  
19 indirect criminal contempt or a civil contempt, I must  
20 forthwith certify those facts to the district judge for  
21 further proceedings. The sanction of civil contempt may be  
22 employed for either of two purposes: To coerce the defendant  
23 into compliance, and/or to compensate the complainant for  
24 losses.

25           A finding of civil contempt must be supported by

1 clear and convincing evidence; that is, evidence that the  
2 alleged person violated the order -- I'm sorry, that the order  
3 that was violated was valid and lawful, clear and unambiguous,  
4 that the person had the ability to comply.

5           And clear and convincing evidence is evidence that  
6 places in the mind of the ultimate fact-finder an abiding  
7 conviction that the truth of the factual contention is highly  
8 probable.

9           As compared to civil contempt, criminal contempt is  
10 punitive. So an alleged criminal contempt occurring outside  
11 the presence of the Court, which would be an indirect criminal  
12 contempt, must be proven beyond a reasonable doubt.

13           So that's the framework of where we are. I make the  
14 following findings, each of which I will explain more fully:

15           First, I find that Dr. Wright has not met his burden  
16 of proving by a preponderance of the evidence that he's unable  
17 to comply with my orders.

18           Second, the evidence in the record before me does  
19 not rise to the level of proof beyond a reasonable doubt  
20 necessary for criminal contempt, and for that reason I do not  
21 certify criminal contempt to Judge Bloom. Although I find  
22 clear and convincing evidence that could support a civil  
23 contempt, the sanctions available under Rule 37 are  
24 sufficient, so I exercise my discretion. I do not certify  
25 facts to Judge Bloom for civil contempt proceedings.

1           Third, an award of attorney's fees is warranted  
2 against Dr. Wright, but not against his counsel.

3           And, fourth, I impose substantive sanctions under  
4 Rule 37, which I'll discuss later.

5           So the factual issue for decision before me is  
6 whether a preponderance of the evidence proves that Dr. Wright  
7 is incapable of complying with the Court's orders, and  
8 specifically, did Dr. Wright prove that the evidence necessary  
9 to identify his Bitcoin holdings on December 31st, 2013, is  
10 encrypted in a file that is in a blind trust and for which  
11 Dr. Wright does not have and cannot presently get the  
12 decryption keys. The evidence offered in support of this  
13 hypothesis was the testimony of Dr. Wright and the testimony  
14 of Steven Kaufman, also known as Steve Shadders.

15           Now, as the finder of fact, I must consider a number  
16 of questions in assessing the witness' credibility:

17           First, did the witness impress me as one who was  
18 telling the truth?

19           Second, did the witness have any particular reason  
20 not to tell the truth?

21           Third, did the witness have a personal interest in  
22 the outcome of the case?

23           Fourth, did the witness seem to have a good memory?

24           Fifth, did the witness have the opportunity and  
25 ability to accurately observe the things he or she testified

1 about?

2 Sixth, did the witness appear to understand the  
3 questions clearly and answer them directly?

4 And, seventh, did the witness' testimony differ from  
5 other testimony or other evidence?

6 That is the Eleventh Circuit pattern jury  
7 instruction on witness credibility.

8 As will be discussed more fully in a minute, the  
9 evidence in the record demonstrated that Dr. Wright, either  
10 directly or through counsel, made inconsistent statements  
11 about material matters. And in considering that evidence, I  
12 am mindful, quote: That a simple mistake doesn't mean a  
13 witness isn't telling the truth as he or she remembers it.  
14 People naturally tend to forget some things or remember them  
15 inaccurately. So if a witness misstated something, I must  
16 decide whether it was because of an innocent lapse in memory  
17 or an intentional deception. And the significance of that may  
18 depend on whether the misstatement is about an important fact  
19 or an unimportant detail. That's the Eleventh Circuit pattern  
20 jury instruction on~-- also on witness credibility and  
21 inconsistent statements.

22 A party's disbelieved testimony can be used to  
23 sustain the opposing party's burden of proof.

24 Let me turn for a second to Mr. Shadders.

25 Mr. Shadders testified that he was asked by Dr. Wright to try

1 to reconstruct Dr. Wright's Bitcoin holdings by applying six  
2 data filters to the public Bitcoin block chain. Mr. Shadders  
3 is the chief technology officer at nChain, Limited, a Bitcoin  
4 technology company in London, where Dr. Wright is the chief  
5 scientist. Dr. Wright provide the six-filter criteria.  
6 Mr. Shadders wrote computer code to apply it and devoted  
7 approximately 12 to 16 hours to the project. His analysis  
8 identified approximately 27,000 Bitcoin public addresses that  
9 met all six criteria.

10 Because one of the criteria was that the Bitcoin  
11 address correspond to a newly mined Bitcoin block, each public  
12 address represents 50 Bitcoin. Therefore, Mr. Shadders'  
13 analysis identified approximately 1,350,000 Bitcoin. These  
14 could not be further distilled to identify Bitcoin controlled  
15 by Dr. Wright.

16 I found Mr. Shadders' testimony about his effort to  
17 apply these filter criteria to be credible and worthy of  
18 belief. I understand the inference that Dr. Wright would not  
19 have wasted Mr. Shadders' time if Dr. Wright were capable of  
20 complying with the Court's order. I also accept that  
21 Mr. Shadders' efforts demonstrate a good-faith attempt by  
22 Dr. Wright to comply. Nevertheless, for the reasons I will  
23 talk about in a moment, I give limited weight to these two  
24 inferences.

25 Let me turn now to Dr. Wright's testimony.

1           Apparently, dead men tell no tales, but perhaps they  
2 send bonded couriers. I completely reject Dr. Wright's  
3 testimony about the alleged Tulip Trust, the alleged encrypted  
4 file and his alleged inability to identify his Bitcoin  
5 holdings. Quite simply, Dr. Wright's story not only was not  
6 supported by other evidence in the record, it defies common  
7 sense and real life experience.

8           Consider the claims.

9           Dr. Wright says he designed Bitcoin to be an  
10 anonymous digital cash system with an evidentiary trail. He  
11 mined approximately 1 million Bitcoin. There is no accessible  
12 evidentiary trail for the vast majority of them.

13           He portrays himself as a latter day  
14 Dr. Frankenstein, whose creature turned evil when hijacked by  
15 drug dealers, human traffickers and other criminals. So to  
16 save himself, he engaged David Kleiman to remove all traces of  
17 his involvement with Bitcoin from the public record. As part  
18 of his efforts to disassociate from Bitcoin and, quote, so  
19 that I wouldn't be in trouble, end quote, he put all his  
20 Bitcoin and/or the keys to it, because the story changed, into  
21 a computer file that is encrypted with a hierarchical Shamir  
22 encryption protocol.

23           He then put the encrypted file into a blind trust,  
24 of which he is the trustee, and gave away a controlling number  
25 of the key slices to the now deceased Dave Kleiman, and so

1 therefore he cannot now encrypt the file that controls access  
2 to the Bitcoin. His only hope is that a bonded courier  
3 arrives in 2020 with the decryption keys. If the courier does  
4 not appear, Dr. Wright will lose the ability to access  
5 billions of dollars-worth of Bitcoin, and he says he doesn't  
6 care. That's completely inconceivable.

7           Turning to the factors that the Eleventh Circuit  
8 says I must consider.

9           Dr. Wright's demeanor did not impress me as someone  
10 who was telling the truth. When it was favorable to him,  
11 Dr. Wright appeared to have an excellent memory and a  
12 scrupulous attention to detail. Otherwise, he was belligerent  
13 and evasive. He did not directly and clearly respond to  
14 questions. He quibbled about irrelevant technicalities. When  
15 confronted with evidence indicating that certain documents had  
16 been fabricated or altered he became defensive, tried to  
17 sidestep questioning, and ultimately made vague comments about  
18 systems being hacked and others having access to his  
19 computers. None of these excuses were corroborated by any  
20 other evidence.

21           Dr. Wright has a substantial stake in the outcome of  
22 this case. If the plaintiffs succeed on their claims, he  
23 stands to lose billions of dollars in Bitcoin. That gives him  
24 a powerful motive not to identify his Bitcoin. As long as the  
25 relevant Bitcoin addresses remain secret, he can transfer the

1 Bitcoin without the plaintiffs ever being able to find them.  
2 Because after all, Bitcoin is an anonymous cyber currency.

3           In addition, Dr. Wright had very good motives not to  
4 tell the truth. Most notably, he might want to prevent the  
5 plaintiffs or others from finding his trove of Bitcoin.  
6 Alternatively, there was evidence that relevant documents were  
7 altered in or about 2014 when the Australian tax office  
8 investigation was actively -- I'm sorry, when the Australian  
9 tax office was actively investigating one of Dr. Wright's  
10 companies. Perhaps Dr. Wright's testimony here is motivated  
11 by certain legal and factual positions he took in the  
12 Australian tax office investigation and from which he cannot  
13 now recede.

14           At the end of the day, his motivation doesn't  
15 matter. His testimony is not credible on its face.

16           As Judge Bloom recently noted, Dr. Wright has taken  
17 directly conflicting factual positions at different times  
18 throughout this litigation, and that behavior continued before  
19 me.

20           There was substantial credible evidence that  
21 documents produced by Dr. Wright to support his position in  
22 this litigation are fraudulent and forged. There was credible  
23 and compelling evidence that documents had been altered.  
24 Other documents are directly contradicted by Dr. Wright's  
25 testimony or his sworn declaration of May 8th. While it is

1 true that there was no direct evidence that Dr. Wright was  
2 responsible for the alterations or fabrications of documents,  
3 there is no evidence before the Court that anyone else had a  
4 motive to falsify them. And although Dr. Edman was not  
5 permitted to testify that he believed they were fraudulent, as  
6 the finder of fact, I find them to be fraudulent, and  
7 willfully so. There is a strong and un rebutted circumstantial  
8 inference that Dr. Wright willfully created fraudulent  
9 documents.

10           One example is the Deed of Trust document for the  
11 Tulip Trust. Among the trust assets identified in this  
12 purported Deed of Trust, dated October 23rd, 2012, are all  
13 Bitcoin and associated ledger assets transferred into Tulip  
14 Trading, Limited by David Kleiman on February 10th, 2011.  
15 Notably absent from the list of trust assets is any encrypted  
16 file, any software or any public or private keys.

17           The Deed of Trust states that the parties forming  
18 the Tulip Trust are Wright International Investments, Limited  
19 and Tulip Trading, Limited. There was credible and  
20 conclusively probative evidence that Dr. Wright did not  
21 control Tulip Trading, Limited until 2014, which would have  
22 been two years after the trust allegedly was formed. There  
23 was other forensic evidence indicating that the Deed of Trust  
24 document itself is fraudulent.

25           So the totality of the evidence in the record does

1 not substantiate -- I'm sorry. I find that the totality of  
2 the evidence in the record does not substantiate that the  
3 Tulip Trust even exists, and I find that Dr. Wright's  
4 testimony that this trust exists was intentionally false. And  
5 although I am only required to make this finding by a  
6 preponderance of the evidence, if required to do so, I would  
7 find clear and convincing evidence to support it.

8 Dr. Wright's false testimony about the Tulip Trust  
9 was part of a sustained and concerted effort to impede  
10 discovery in this case. I start with his deceptive and  
11 incomplete discovery pleadings. He testified at the  
12 evidentiary hearing that at least as early as December 2018,  
13 he knew he could not provide a listing of his Bitcoin  
14 holdings, yet the Court was not told this quote-unquote fact  
15 until April 18th, 2019.

16 I give Dr. Wright the benefit of the doubt that  
17 prior to May 14th, the plaintiffs were seeking information  
18 that went beyond merely a list of his Bitcoin holdings on  
19 December 31st, 2013. Nevertheless, after the May 14th  
20 hearing, it was well and clear that the Court expected  
21 Dr. Wright to provide plaintiffs with sufficient information  
22 so the Bitcoin holdings could be traced.

23 After May 14th, having lost on legal grounds,  
24 Dr. Wright changed course and started making affirmative  
25 misleading factual statements to the Court. His April 18th

1 motion argued for the first time that he had transferred all  
2 of his Bitcoin into a blind trust, and that he was not a  
3 trustee or beneficiary of that trust, nor did he know any of  
4 the public addresses which hold any of the Bitcoin in the  
5 blind trust. This pleading was intended to communicate the  
6 false impression that Dr. Wright had no remaining connection  
7 to the Bitcoin, and it was also intended to create the  
8 impression that the Bitcoin themselves had been transferred  
9 into the trust.

10 Now, this was a pleading. It was not verified; it  
11 was signed by counsel. And by signing the document, counsel  
12 certified that the pleading had evidentiary support. The only  
13 source of information that could have provided the information  
14 was Dr. Wright. So I find that counsel reasonably relied upon  
15 Dr. Wright as the source of that information, and that  
16 Dr. Wright is personally responsible for the  
17 misrepresentations made in the pleading on April 18th.

18 As I noted earlier in discussing with Ms. McGovern,  
19 three weeks later, Dr. Wright submitted a sworn statement that  
20 contradicted the April 18th motion in which he admitted he was  
21 one of the trustees of the trust. So, clearly, his  
22 represent -- one of those representations cannot be true.

23 He also gave inconsistent sworn testimony about what  
24 is in the alleged trust. His April 18th motion states that  
25 Bitcoin had been transferred to the trust. His May 8th

1 declaration swears that Bitcoin had been transferred to the  
2 trust. But at his deposition and at the evidentiary hearing,  
3 he changed his story and testified that what had been  
4 transferred were the keys to Bitcoin, not the Bitcoin itself.

5 All of this evidence cannot be reconciled;  
6 particularly, the April 18th motion and the May 8th  
7 declaration. One of them is intentionally false. The Court  
8 gave Dr. Wright an extension of time to draft and file the  
9 declaration so he could meet in person with counsel. He swore  
10 they had met, and that he had provided counsel, quote: With  
11 additional details and clarity regarding trusts that I settled  
12 that hold or held Bitcoin that I mined or acquired on or  
13 before December 31st, 2013. He further -- end quote.

14 He further swore, quote: In June 2011, I took steps  
15 to consolidate the Bitcoin I mined with Bitcoin that I  
16 acquired and other assets.

17 In October 2012, a formal trust document was  
18 executed, creating a trust whose corpus included the Bitcoin  
19 that I mined, acquired, and would acquire in the future. The  
20 name of that trust is Tulip Trust. It was formed in the  
21 Seychelles, end quote.

22 During his testimony at the evidentiary hearing,  
23 Dr. Wright made a point of being precise in his use of terms,  
24 including at one point contesting whether a document was an  
25 e-mail or a PDF of an e-mail. It is not credible that given

1 his claim to have an intimate understanding of Bitcoin, he  
2 would have mistaken the currency for the keys that control the  
3 ability to transfer the currency. I find, instead, that he  
4 belatedly realized that any transactions transferring Bitcoin  
5 into the Tulip Trust would be reflected on the master block  
6 chain. That he would then be required to identify those  
7 transactions, which would allow plaintiffs to trace. So to  
8 avoid that, he changed his story again.

9 His story also changed at the evidentiary hearing,  
10 where he argued for the first time that a list of public  
11 addresses was meaningless. As I've noted, the Court never  
12 ordered him to produce a list of public addresses. I ordered  
13 him to produce a list of his Bitcoin holdings.

14 His position that public addresses are meaningless  
15 or have no evidentiary value is particularly disturbing,  
16 because it was his counsel who first injected the idea of  
17 public addresses as a discovery matter. Now, admittedly,  
18 counsel answered the Court's question without consulting  
19 Dr. Wright and without time to fully research the situation,  
20 so I do not fault counsel. But if, as Dr. Wright now asserts,  
21 his counsel was wrong, Dr. Wright, the self-proclaimed creator  
22 of Bitcoin, and therefore a person who claims to have intimate  
23 knowledge of how Bitcoin works, should have corrected the  
24 record long before the evidentiary hearing on June 28th.

25 Instead, in his April 18th motion, Dr. Wright

1 explained he could not produce a list of public addresses. He  
2 never said that public addresses lack evidentiary value. This  
3 behavior continued in his May 8th declaration, where he again  
4 talked about public addresses, but never argued that they were  
5 meaningless.

6           Although Dr. Wright may not have an obligation to  
7 correct an opposing party if its discovery request is  
8 imprecise, the Court is different, particularly where, as  
9 here, the Court's intent was unmistakable. It was clear that  
10 the Court was ordering Dr. Wright to produce evidence to  
11 document the existence and extent of his Bitcoin holdings so  
12 that plaintiffs could attempt to trace them through the master  
13 block chain. If, as Dr. Wright now claims, the public  
14 addresses are not the proper data point to identify the  
15 Bitcoin he held on December 31st, 2013, he had an obligation  
16 to tell the Court.

17           His delay in doing so is deceptive and intentionally  
18 misleading.

19           All this information is more than sufficient to  
20 warrant sanctions that I've discussed. However, there is also  
21 the alleged file that Dr. Wright claims is being held by the  
22 Tulip Trust which contains the information necessary to  
23 reconstruct his Bitcoin holdings. I find that file does not  
24 exist based on the evidence before me. Dr. Wright testified  
25 it is an encrypted compressed file containing multiple

1 subfiles. He explained, quote, each of these files has a  
2 differently calculated encryption key. It's a hierarchical  
3 system, where, based on a combination of the file hash and the  
4 original encryption key, there are a variety of those, there  
5 are multiple Shamir schemes. So, in essence, he testified  
6 it's like a Russian nesting doll.

7           The Shamir scheme divides a single encryption key  
8 into multiple key slices, and some subset of those key slices  
9 is needed to decrypt a file. Dr. Wright testified that 15 key  
10 slices existed for the outermost file, but only eight key  
11 slices were needed to decrypt that file, but he only has  
12 seven, or can only access seven.

13           After observing his demeanor and considering a lack  
14 of any other credible evidence in the record that this file  
15 exists, I find that a preponderance of the evidence exists  
16 that no -- I'm sorry, I find that a preponderance of the  
17 evidence establishes that no such file exists, and that  
18 Dr. Wright's testimony to the contrary was perjurious.

19           I also note as a side note that Dr. Wright testified  
20 that the key slices for the encryption of the outermost layer  
21 had to be applied in a particular order. That is not what  
22 Dr. Shamir's paper says. According to Dr. Shamir's paper, a  
23 Shamir scheme is decrypted by inserting each key slice into  
24 the same polynomial to create a series of linear equations,  
25 which are then solved simultaneously, not sequentially. There

1 is no ordering or indexing of the key slices.

2 Now, that being said, I do not exclude the  
3 possibility that Dr. Wright could have employed a modified  
4 Shamir scheme, so I do not consider this testimony as to the  
5 ordering of the key slices in making my overall findings, but  
6 I do note it is inconsistent with Dr. Shamir's paper.

7 Now, Dr. Wright argues quite forcefully that he would  
8 never risk going to jail for contempt or having sanctions  
9 imposed against him if he could produce a list of his Bitcoin  
10 holdings. He argues that it would not be credible that anyone  
11 would make that choice.

12 Equally, if not more incredible, is the idea that  
13 someone who controlled almost a million Bitcoin would encrypt  
14 it in a way he could not access it and then wouldn't care if  
15 he lost it all.

16 Additionally, as discussed above, there are many  
17 reasons a person in Dr. Wright's situation would take the  
18 risk.

19 In sum, after days of testimony, multiple discovery  
20 hearings and lengthy pleadings, the sole evidence supporting  
21 Dr. Wright's claim that he cannot comply with my order is his  
22 uncorroborated, incredible testimony. That is simply  
23 insufficient to meet his evidentiary burden of proving by a  
24 preponderance of the evidence that he is unable to comply.  
25 Moreover, the totality of the evidence, including the negative

1 inference that I draw from Dr. Wright's not credible testimony  
2 is more than sufficient to meet the plaintiffs' burden.

3           Now, Dr. Wright's counsel has also made a very  
4 forceful argument that sanctions in this case ought to be  
5 tempered by the idea that we should let the process play out.  
6 There shouldn't be a windfall to the plaintiff for a discovery  
7 violation, and I'm mindful of that. But I also must say there  
8 is nothing, nothing more prejudicial or inimical to the  
9 American judicial system than perjury and false testimony,  
10 which I have found occurred in this case.

11           So I now turn to the question of a proper remedy.

12           I begin with something I hope is obvious here. I do  
13 not find any basis, any basis for sanctions against  
14 Dr. Wright's counsel. Although several rules of civil  
15 procedure authorize the Court to consider sanctions and  
16 attorney's fees against counsel, there is no basis for that in  
17 this record. I have conducted numerous hearings, and I have  
18 been able to closely observe counsel's conduct. Counsel has  
19 zealously and ethically advocated for their client. Counsel  
20 has unfailingly been candid with this Court, even when  
21 Dr. Wright's conduct and conflicting statements have created  
22 incredibly awkward situations for counsel. I find that  
23 counsel reasonably relied on Dr. Wright as a source of  
24 information. I find that Dr. Wright alone is fully  
25 responsible for any evasion, incomplete or false

1 representations to the Court or noncompliance with the Court's  
2 orders. To that end, I commend his counsel for their  
3 outstanding work in this matter.

4           So to this day, Dr. Wright has still not complied  
5 with my order compelling discovery. Rather, as described  
6 already, a preponderance of the evidence establishes a  
7 continuing pattern of obstructive behavior, including  
8 incomplete or deceptive pleadings, filing a false declaration,  
9 knowingly producing a fraudulent trust document and giving  
10 perjurious testimony. His conduct has wasted substantial  
11 amounts of the Court's time and the plaintiffs' time and  
12 resources, which could have been saved. His behavior has  
13 unnecessarily protracted this litigation.

14           I find there is clear and convincing evidence that  
15 Dr. Wright's noncompliance is willful and in bad faith, that  
16 plaintiffs have been prejudiced in the amount of time and  
17 money and diversion that has been occasioned upon them, and  
18 particularly given the extended pattern of noncompliance and  
19 its egregiousness, a lesser sanction is not adequate to punish  
20 or ensure future compliance with the Court's order.

21           Therefore, I will impose sanctions under Rule 37(b)  
22 in addition to attorney's fees.

23           I start with the fact that Dr. Wright's conduct has  
24 prevented the plaintiffs from obtaining evidence that I found  
25 relevant to their claims to a partnership between Dr. Wright

1 and David Kleiman related to the development of Bitcoin  
2 technology and the mining of Bitcoin. Plaintiffs have been  
3 prejudiced by not being able to try to pursue this theory by  
4 tracing the Bitcoin that was mined.

5 Therefore, as a remedial measure pursuant to Federal  
6 Rule of Civil Procedure 37(b)(2)(A)(i), the Court deems the  
7 following facts to be established for purposes of this action:

8 And, by the way, I find that no lesser sanction is  
9 sufficient than what I'm about to announce.

10 One, Dr. Wright and David Kleiman entered into a  
11 50 percent 50/50 partnership to develop Bitcoin intellectual  
12 property and to mine Bitcoin.

13 Second, it is deemed proven that all Bitcoin mined  
14 by Dr. Wright prior to December 31st, 2013, was joint property  
15 of Dr. Wright and David Kleiman at the time it was mined.  
16 Because Dr. Wright's 10th affirmative defense relating to the  
17 statute of frauds challenges the existence of a partnership,  
18 it is inconsistent with these findings and these facts, so it  
19 is stricken.

20 As a further punitive sanction, I deem the following  
21 facts:

22 One, any Bitcoin-related intellectual property  
23 developed by Dr. Wright prior to David Kleiman's death is  
24 jointly and equally owned by Dr. Wright and by the plaintiffs.

25 And, two, any Bitcoin mined by Dr. Wright prior to

1 David Kleiman's death and any assets traceable to those  
2 Bitcoin is presently jointly and equally owned by the  
3 plaintiffs and Dr. Wright.

4 Dr. Wright's third, fourth, fifth, sixth, seventh,  
5 eighth, second seventh affirmative defenses assert that David  
6 Kleiman surrendered has legal rights in return for shares in a  
7 corporation. These affirmative defenses are inconsistent with  
8 the facts as I have deemed them, so they are stricken.

9 I do not strike Dr. Wright's first, second, I think  
10 ninth, or 11th and 12th affirmative defenses. So I do not --  
11 I do not strike all of his pleadings. I do not enter a  
12 default judgment. I leave in place the affirmative defenses  
13 relating to statute of limitations, latches, res judicata and  
14 the one I can't remember.

15 In addition, Dr. Wright's April 18th motion which  
16 was in substance a motion for protective order was denied, the  
17 plaintiffs' June 3rd motion to compel was granted, and the  
18 current motion is also granted. Therefore, I will order that  
19 the plaintiffs are entitled to receive reasonable attorney's  
20 fees and expenses related to each of those motions.

21 I will enter a written order summarizing these  
22 findings more fully.

23 And with that, is there anything further that we  
24 need to take up this afternoon, Mr. Freedman?

25 MR. FREEDMAN: No, Your Honor.

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THE COURT: Ms. McGovern?

MS. McGOVERN: No, Your Honor.

THE COURT: All right. Thank you all very much.  
We'll be in recess.

(Proceedings concluded.)

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I N D E X

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\* \* \* \* \*

E X H I B I T S

(None.)

\* \* \* \* \*

CERTIFICATE

I, Stephen W. Franklin, Registered Merit Reporter, and Certified Realtime Reporter, certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Dated this 27th day of AUGUST, 2019.

/s/Stephen W. Franklin

\_\_\_\_\_  
Stephen W. Franklin, RMR, CRR

<p><b>MR. BRENNER:</b> [1] 3/14  <b>MR. FREEDMAN:</b> [40] 3/9 4/14 4/17 5/11 5/14 5/20 5/23 6/7 6/14 21/11 21/14 29/25 30/4 30/11 30/17 42/7 42/12 42/19 42/25 43/5 43/9 43/12 46/4 49/17 50/14 50/21 50/23 51/4 51/10 51/13 54/20 54/24 56/7 56/9 57/2 57/20 57/22 58/6 61/7 89/25  <b>MR. KASS:</b> [1] 3/25  <b>MR. RIVERO:</b> [1] 3/21  <b>MR. ROCHE:</b> [1] 3/12  <b>MS. MARKOE:</b> [1] 4/3  <b>MS. McGOVERN:</b> [35] 3/18 4/21 5/4 6/17 6/19 22/17 23/2 23/8 24/2 24/17 25/4 25/19 26/13 27/13 27/17 27/19 27/22 28/1 28/11 28/22 28/25 29/4 29/10 29/12 29/14 29/22 58/9 58/13 58/16 58/18 59/14 61/10 63/11 63/13 90/2  <b>THE COURT:</b> [82] 3/2 3/11 3/13 3/16 3/20 3/24 4/2 4/5 4/16 4/18 4/22 5/6 5/13 5/15 5/22 6/6 6/9 6/15 6/18 20/11 21/17 22/1 22/13 22/18 23/7 23/23 24/6 25/1 25/5 26/11 27/12 27/14 27/18 27/20 27/23 28/10 28/21 28/23 29/1 29/5 29/11 29/13 29/16 29/23 30/2 30/7 30/16 42/3 42/11 42/15 42/22 43/1 43/8 43/10 46/2 49/16 50/8 50/18 50/22 51/2 51/6 51/12 54/18 54/23 56/5 56/8 56/17 57/19 57/21 58/4 58/7 58/10 58/15 58/17 59/13 61/9 63/7 63/12 63/24 64/5 90/1 90/3  <b>THE WITNESS:</b> [4] 20/15 21/12 21/24 22/2</p>	<p><b>1,350,000</b> [1] 74/13  <b>10</b> [2] 41/14 41/14  <b>100</b> [2] 2/3 2/6  <b>100 percent</b> [4] 35/6 35/19 41/16 48/6  <b>1000</b> [4] 2/12 2/15 2/18 2/21  <b>10504</b> [1] 2/9  <b>10th</b> [2] 78/14 88/16  <b>111</b> [1] 54/24  <b>112</b> [1] 54/25  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79/12  <b>2019</b> [5] 1/8 31/22 32/9 79/15 91/17  <b>2020</b> [4] 9/17 15/6 19/1 76/3  <b>210</b> [1] 64/8  <b>217</b> [1] 64/9  <b>22</b> [1] 7/17  <b>23</b> [1] 36/16  <b>23rd</b> [1] 78/12  <b>24th</b> [1] 37/13  <b>2500</b> [1] 2/20  <b>2525</b> [3] 2/11 2/14 2/17</p>	<p><b>26</b> [1] 1/8  <b>27,000</b> [3] 42/11 42/12 74/8  <b>27th</b> [1] 91/17  <b>2800</b> [2] 2/3 2/6  <b>28th</b> [9] 10/19 13/7 18/12 27/24 29/11 37/8 68/25 69/2 82/24  <b>293</b> [1] 32/12  <b>294</b> [1] 32/19  <b>2:17</b> [1] 30/5  <b>2:20</b> [1] 30/3  <b>2:22</b> [1] 30/5  <b>2nd</b> [2] 2/3 2/6</p> <hr/> <p><b>3</b>  <b>30</b> [1] 91/5  <b>300,000</b> [3] 30/22 52/8 57/8  <b>31st</b> [12] 7/7 11/6 19/1 31/10 31/25 62/4 65/3 72/9 79/19 81/13 83/15 88/14  <b>33131</b> [2] 2/4 2/7  <b>33134</b> [4] 2/12 2/15 2/18 2/21  <b>333</b> [1] 2/9  <b>33401</b> [1] 1/18  <b>37</b> [15] 45/4 51/13 51/15 51/16 54/10 55/7 55/20 68/20 69/6 69/15 69/17 71/23 72/4 87/21 88/6  <b>3768</b> [1] 1/17  <b>3:10</b> [1] 63/25  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 <b>93</b> [1] 54/24  <b>94</b> [1] 54/24  <b>95</b> [1] 54/24</p> <hr/> <p><b>A</b>  <b>Abacus</b> [1] 38/2  <b>abiding</b> [1] 71/6  <b>ability</b> [10] 20/5 47/20 54/6 55/4 55/15 62/12 71/4 72/25 76/4 82/3  <b>able</b> [15] 13/9 15/4 15/9 20/5 20/19 21/7 21/12 22/10 22/12 23/15 34/21 58/2 77/1 86/18 88/3  <b>above</b> [4] 47/10 55/7 85/16 91/16  <b>above-entitled</b> [1] 91/16  <b>absence</b> [3] 16/15 17/10 63/21  <b>absent</b> [1] 78/15  <b>absolute</b> [1] 61/25  <b>absolutely</b> [5] 10/25 14/21 28/3 34/23 35/18  <b>abuses</b> [1] 69/18  <b>accept</b> [2] 65/1 74/20  <b>access</b> [17] 8/18 9/4 9/4 9/22 12/12 13/9 14/17 18/8 36/6 39/16 40/21 41/9 76/1 76/4 76/18 84/12 85/14  <b>accessed</b> [4] 7/13 24/24 26/2 68/16  <b>accessible</b> [2] 53/19 75/11  <b>according</b> [2] 8/20 84/22  <b>account</b> [1] 37/17  <b>accounts</b> [1] 62/7  <b>accurate</b> [8] 14/15 34/24 35/19 41/16 41/25 42/4 67/23 68/9  <b>accurately</b> [2] 42/5 72/25  <b>achieve</b> [1] 51/23  <b>acknowledge</b> [1] 46/24  <b>acquire</b> [1] 81/19  <b>acquired</b> [4] 65/9 81/12 81/16 81/19  <b>across</b> [1] 59/18  <b>act</b> [1] 45/9  <b>action</b> [3] 51/19 55/21</p>	<p>88/7  <b>actively</b> [2] 77/8 77/9  <b>actual</b> [1] 30/12  <b>actually</b> [18] 5/20 6/21 21/3 24/18 24/21 24/21 26/1 26/23 27/12 30/11 32/18 35/3 37/21 37/25 37/25 38/7 49/9 62/2  <b>added</b> [1] 69/18  <b>addition</b> [9] 7/6 7/19 8/24 9/5 9/24 56/2 77/3 87/22 89/15  <b>additional</b> [4] 11/11 60/7 69/3 81/11  <b>additionally</b> [3] 9/2 55/8 85/16  <b>address</b> [18] 11/4 11/13 11/17 11/18 12/7 15/3 20/9 23/10 28/19 28/20 36/22 42/20 47/14 48/19 55/2 56/18 74/11 74/12  <b>addressed</b> [1] 18/15  <b>addresses</b> [62] 6/21 7/5 7/12 7/15 7/17 7/20 8/6 8/18 9/16 10/4 10/10 10/16 10/17 11/7 11/10 12/6 12/12 13/10 13/25 14/17 14/20 14/25 16/20 17/5 20/24 22/10 27/11 27/16 27/21 27/24 28/3 33/8 42/2 42/10 52/15 52/16 52/17 52/18 52/23 52/24 53/12 53/13 53/16 61/5 62/2 66/13 66/14 66/18 67/12 68/1 68/15 74/8 76/25 80/4 82/11 82/12 82/14 82/17 83/1 83/2 83/4 83/14  <b>addressing</b> [2] 6/24 11/20  <b>adds</b> [1] 57/12  <b>adequate</b> [1] 87/19  <b>adequately</b> [4] 45/7 47/14 48/19 70/1  <b>adjudicated</b> [1] 61/16  <b>administration</b> [2] 34/13 47/16  <b>admission</b> [1] 17/6  <b>admissions</b> [1] 30/21  <b>admit</b> [2] 22/4 55/11  <b>admits</b> [2] 38/19 40/13  <b>admitted</b> [7] 41/22 43/6 52/7 54/13 55/1 57/7 80/20  <b>admittedly</b> [2] 66/10 82/17  <b>adopted</b> [1] 44/1  <b>advised</b> [1] 64/19  <b>advocate</b> [2] 22/19 29/17  <b>advocated</b> [1] 86/19  <b>affidavit</b> [2] 22/25 40/16  <b>affidavits</b> [1] 48/4  <b>affirmative</b> [6] 79/24 88/16 89/5 89/7 89/10 89/12</p>
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<p><b>A</b></p> <p><b>after</b> [20] 10/20 23/11 23/11 26/8 26/24 30/5 31/22 33/18 38/7 46/7 46/23 49/7 64/3 68/20 77/2 78/22 79/19 79/23 84/13 85/19</p> <p><b>afternoon</b> [20] 3/2 3/11 3/13 3/14 3/16 3/18 3/20 3/21 3/25 4/2 4/3 4/5 5/17 6/17 6/18 20/14 20/15 64/5 64/19 89/24</p> <p><b>again</b> [10] 27/8 36/24 37/14 40/19 46/8 46/14 55/24 67/25 82/8 83/3</p> <p><b>against</b> [8] 21/9 49/19 69/8 72/2 72/2 85/9 86/13 86/16</p> <p><b>aged</b> [2] 37/11 38/15</p> <p><b>agree</b> [2] 6/11 27/22</p> <p><b>agreed</b> [3] 63/12 63/13 66/23</p> <p><b>agreement</b> [1] 67/4</p> <p><b>ahead</b> [1] 43/11</p> <p><b>airing</b> [1] 47/25</p> <p><b>AL</b> [1] 1/3</p> <p><b>algorithm</b> [1] 9/15</p> <p><b>all-inclusive</b> [1] 17/5</p> <p><b>allegation</b> [1] 52/4</p> <p><b>allegations</b> [9] 11/24 12/25 16/10 35/1 35/14 54/11 55/11 59/7 61/20</p> <p><b>alleged</b> [9] 48/24 49/7 71/2 71/10 75/3 75/3 75/4 80/24 83/21</p> <p><b>allegedly</b> [1] 78/22</p> <p><b>alleges</b> [1] 65/7</p> <p><b>allocation</b> [1] 20/1</p> <p><b>allow</b> [10] 9/15 14/16 21/21 28/7 28/8 28/11 28/13 47/25 51/16 82/7</p> <p><b>allowed</b> [1] 60/6</p> <p><b>allowing</b> [2] 49/14 49/18</p> <p><b>allows</b> [3] 9/21 51/10 51/13</p> <p><b>almost</b> [3] 39/24 61/24 85/13</p> <p><b>alone</b> [1] 86/24</p> <p><b>already</b> [6] 12/21 12/22 15/1 41/10 53/5 87/6</p> <p><b>also</b> [30] 11/2 15/7 16/1 19/11 20/23 23/13 26/19 28/23 38/4 38/11 45/17 45/18 52/20 58/22 64/15 64/23 65/25 69/10 70/14 72/14 73/20 74/20 80/7 80/23 82/9 83/20 84/19 86/3 86/7 89/18</p> <p><b>alterations</b> [1] 78/2</p> <p><b>altered</b> [3] 76/16 77/7 77/23</p> <p><b>alternative</b> [2] 51/11 54/8</p> <p><b>Alternatively</b> [2] 65/14 77/6</p> <p><b>although</b> [7] 52/6 66/15</p>	<p>71/21 78/4 79/5 83/6 86/14</p> <p><b>always</b> [2] 26/6 29/5</p> <p><b>am</b> [8] 28/7 28/11 35/13 42/12 64/22 64/23 73/12 79/5</p> <p><b>Amanda</b> [2] 2/10 3/18</p> <p><b>amended</b> [5] 52/9 54/11 54/14 54/16 65/7</p> <p><b>American</b> 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