

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

IRA KLEIMAN, as personal representative of  
the estate of David Kleiman, and W&K INFO  
DEFENSE RESEARCH, LLC

plaintiffs,

v.

Case No. 9:18-cv-80176 (BB/BR)

CRAIG WRIGHT,

defendant.

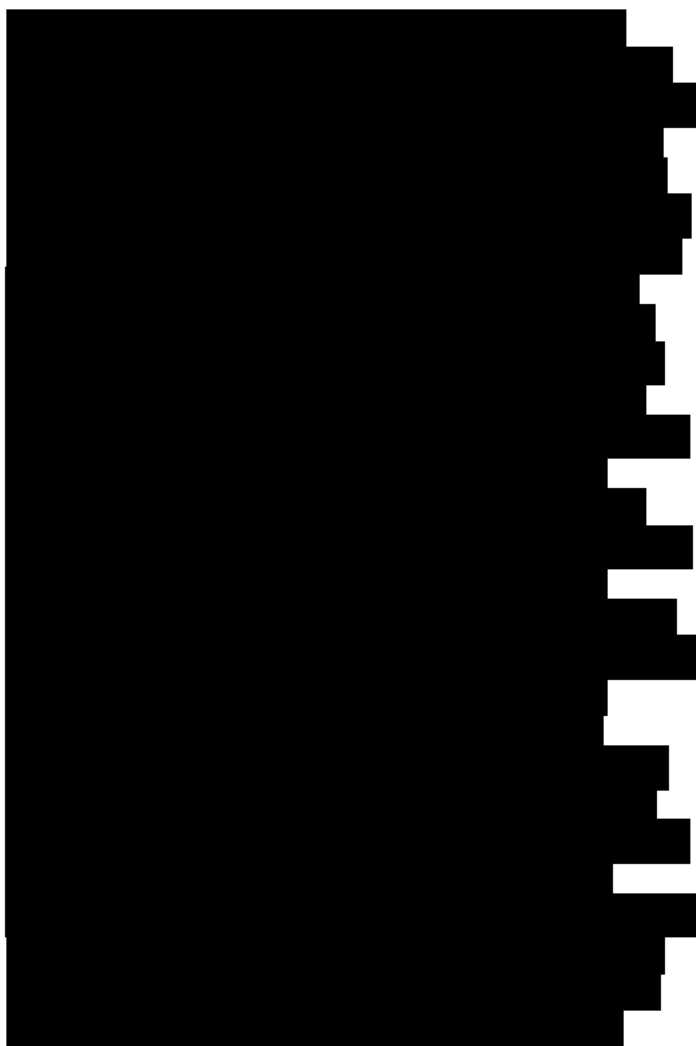
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**DR. CRAIG WRIGHT’S MOTION REGARDING PRODUCTION OF A LIST OF THE  
PUBLIC ADDRESSES OF HIS BITCOIN AS OF DECEMBER 31, 2013  
FILED UNDER SEAL**

The Court has ordered Dr. Wright to identify all public addresses that he owned as of December 31, 2013 or, if he cannot do so, explain why identification is unduly burdensome. Dr. Wright does not have a complete list of the public addresses that he owned as of any date. To create such a list would be unduly burdensome. A Bitcoin public address is an identifier of 26-35 alphanumeric characters. Such addresses are not intended to be memorized and remembered for a period of nearly a decade. However, Dr. Wright knows that he mined [REDACTED] blocks on the blockchain. Because the public addresses associated with blocks are publicly available, Dr. Wright is able to identify the public addresses associated with the [REDACTED] blocks on the blockchain and provides those public addresses below. [REDACTED] Dr. Wright did not keep track of which Bitcoin blocks he mined. Dr. Wright does not know any of the other Bitcoin public addresses.

In 2011, Dr. Wright transferred ownership of all of his Bitcoin into a blind trust.<sup>1</sup> Dr. Wright is not a trustee or a beneficiary of the blind trust. Nor does Dr. Wright know any of the public addresses which hold any of the bitcoin in the blind trust. Thus, Dr. Wright does not know and cannot provide any other public addresses.

First, as of December 31, 2013, all of Dr. Wright's bitcoin had been transferred to the blind trust, and therefore are owned by the trusts, not by Dr. Wright. The public addresses referenced above are as follows:



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<sup>1</sup> Notably, Dave Kleiman was alive at the time that Dr. Wright transferred his Bitcoin to trusts and did not make any allegation of theft or misappropriation of Bitcoin during the remainder of his life, for nearly two years.

[REDACTED]

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on April 18, 2019, I electronically filed this document with the Clerk of the Court using CM/ECF and the procedures for filing under seal. I also certify that this document is being served today on all counsel of record by electronic mail.

/s/ Andres Rivero  
Andres Rivero