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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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|--------------------------------|---|--------------------|
| IRA KLEIMAN, as the personal   | ) | CASE NO.:          |
| representative of the Estate   | ) |                    |
| of David Kleiman, and W&K Info | ) | 9:18-cv-8016-BB/BR |
| Defense Research, LLC          | ) |                    |
|                                | ) |                    |
| Plaintiffs,                    | ) |                    |
|                                | ) |                    |
| v.                             | ) |                    |
|                                | ) |                    |
| CRAIG WRIGHT                   | ) |                    |
|                                | ) |                    |
| Defendant.                     | ) |                    |
| _____                          | ) |                    |

VIDEOTAPED DEPOSITION OF DONALD JOSEPH LYNAM

ON: Thursday, April 2, 2020

AT: 9:01am (Australian Eastern Daylight Savings Time)

TAKEN AT: Epiq  
Level 4, 190 Queen Street  
Melbourne VIC 3000

COURT REPORTER: Karen Wilsmore

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**A-P-P-E-A-R-A-N-C-E-S**

**ON BEHALF OF THE PLAINTIFFS:**

BOIES SCHILLER FLEXNER LLP  
100 SE 2ND STREET, SUITE 2800  
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BY: MR. ANDREW S. BRENNER

**ON BEHALF OF THE DEFENDANT:**

RIVERO MESTRE LLP  
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MIAMI, FLORIDA 33134  
+1 305 445-2500

BY: MS. AMANDA McGOVERN

**ALSO PRESENT:**

(IN AUSTRALIA)  
Mr Wayne Matthews, Videographer  
Mr Patrick Sexton (Solicitor) Piper Alderman

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**WITNESS INDEX**

| Deponent            | Examined by         | Page |
|---------------------|---------------------|------|
| Donald Joseph Lynam | Ms. Amanda McGovern | 5    |
|                     | Mr. Andrew Brenner  | 40   |

9:01:00 1 THE VIDEOGRAPHER: This is videotape number 1 in  
9:01:03 2 the deposition of Don Lynam in the matter of Ira Kleiman,  
9:01:08 3 as the personal representative of the estate of David  
9:01:12 4 Kleiman, and W&K Info Defense Research LLC versus Craig  
9:01:17 5 Wright, in the United States District Court Southern  
9:01:21 6 District of Florida and the case number is 18-cv-80176.  
9:01:29 7 Today's date is the 2nd of April 2020 and the time on the  
9:01:33 8 video monitor is 9:01 a.m.

9:01:40 9 This deposition is taking place at level 4,  
9:01:42 10 190 Queen Street in Melbourne, Australia. The  
9:01:46 11 videographer today is Wayne Matthews, from Epiq. Would  
9:01:50 12 counsel please identify yourselves and state whom you  
9:01:53 13 represent.

9:01:54 14 MS. McGOVERN: Good morning. My name is Amanda  
9:01:57 15 McGovern, with the law firm of Rivero Mestre, and we  
9:02:01 16 represent Dr. Craig Steven Wright.

9:02:03 17 MR. BRENNER: Good morning. My name is Andrew  
9:02:07 18 Brenner from the law firm of Boies Schiller Flexner and I  
9:02:10 19 represent the plaintiffs.

9:02:10 20 THE VIDEOGRAPHER: Also in the room in Australia?

9:02:13 21 MR. SEXTON: Patrick Sexton, from Piper Alderman.

9:02:16 22 THE VIDEOGRAPHER: The court reporter today is  
9:02:17 23 Karen Wilsmore, from the firm of Epiq. Would the court  
9:02:22 24 reporter please swear in the witness.

9:02:24 25 MR. BRENNER: Before you swear in the witness, the

9:02:28 1 gentleman that is there in Australia, are you counsel for  
9:02:31 2 the witness or local counsel for the defendant?

9:02:34 3 MR. SEXTON: Local counsel for the defendant.

9:02:38 4 MR. BRENNER: Thank you, sir.

9:02:44 5 <DONALD JOSEPH LYNAM,  
6 having been duly sworn  
9:03:04 7 testified as follows:

9:03:04 8 THE VIDEOGRAPHER: Proceed, ladies and gentlemen.

9 EXAMINATION BY MS. McGOVERN:

9:03:08 10 Q. Good morning, Mr. Lynam. As I've just stated  
9:03:10 11 on the record, my name is Amanda McGovern and I'm with  
9:03:17 12 the Miami law firm of Rivero Mestre. We represent  
9:03:23 13 Dr. Craig Steven Wright in this litigation. I'm going to  
9:03:25 14 be asking you questions and I ask that to facilitate this  
9:03:33 15 process, which appears to be very well facilitated with  
9:03:36 16 everyone there in the room, but to facilitate it, if you  
9:03:40 17 could please wait for my question to be completely  
9:03:42 18 finished, take a very brief pause to allow plaintiff's  
9:03:48 19 counsel to object if he wishes and then answer the  
9:03:51 20 question. Does that sound okay to you?

9:03:55 21 A. Yes.

9:03:58 22 Q. I would also ask, Mr. Lynam, if you could  
9:04:02 23 please answer the questions that I ask solely based upon  
9:04:08 24 your personal knowledge of the information I'm asking  
9:04:11 25 about and please don't speculate or guess.

9:04:18 1 A. Yes.

9:04:18 2 Q. Is that okay as well?

9:04:19 3 A. Yes, it is.

9:04:21 4 Q. Thank you. Mr. Lynam, have you been deposed  
9:04:26 5 before?

9:04:27 6 A. Never, no.

9:04:30 7 Q. So this is your first time being deposed, is  
8 that right?

9:04:34 9 A. That's true. I keep on the right side of the  
9:04:36 10 law.

9:04:40 11 Q. You've just been administered an oath to swear  
9:04:43 12 to tell the truth and I want to make sure that you  
9:04:48 13 understand that in this proceeding, that oath that you've  
9:04:52 14 taken is exactly the same oath as though you were  
9:04:56 15 standing in front of a jury in this case in the southern  
9:04:59 16 district of Florida to tell the truth. Do you understand  
9:05:03 17 that, Mr. Lynam?

9:05:05 18 A. Yes, I do.

9:05:08 19 Q. And the testimony that you're giving today by  
9:05:13 20 video conference, or video-taped conference, is going to  
9:05:18 21 be presented to a Miami jury as though you were sitting  
9:05:22 22 in the witness box looking at the Miami jury and  
9:05:25 23 answering the questions that I ask. Do you also  
9:05:29 24 understand that, Mr. Lynam?

9:05:31 25 A. Yes.

9:05:34 1 Q. Are you familiar with the litigation that is  
9:05:38 2 pending that has brought you here today against Dr. Craig  
9:05:46 3 Steven Wright by Ira Kleiman, are you familiar with the  
9:05:52 4 litigation?

9:05:53 5 A. I have a superficial understanding of it.

9:05:57 6 Q. And have you been compelled to come to give  
9:06:05 7 this deposition testimony that you're giving today in  
9:06:08 8 this case, has there been a compulsory process that has  
9:06:15 9 compelled you to come here today?

9:06:16 10 A. Well, the subpoena says that I am compelled,  
9:06:19 11 but I came here quite willingly, hoping to be able to  
9:06:24 12 assist.

9:06:27 13 Q. If there's ever a question that I ask - and I  
9:06:31 14 promise I won't take any longer than I need to - please  
9:06:35 15 ask me to clarify the question, and I will, before you  
9:06:39 16 answer it. Is that also a fair --

9:06:46 17 A. Yes.

9:06:46 18 Q. -- arrangement for this question and answer?  
9:06:49 19 Thank you. Mr. Lynam, have you ever met me in person --

9:06:54 20 A. No.

9:06:58 21 Q. -- before today?

9:06:59 22 A. No.

9:06:59 23 Q. This is the first time we've met, is that  
24 right?

9:07:02 25 A. That is correct.

9:07:03 1 Q. And before today, have you ever seen me in a  
9:07:07 2 video conference of any type or is this the first time  
9:07:12 3 that you are seeing me?

9:07:14 4 A. This is the first time I've seen you.

9:07:18 5 Q. And have I given you - in connection with your  
9:07:23 6 deposition today, have I shared with you any documents  
9:07:28 7 and asked you to review them in connection with your  
9:07:31 8 deposition?

9:07:32 9 A. No.

9:07:37 10 Q. Mr. Lynam, where do you live?

9:07:41 11 A. I live in Pakenham, Victoria.

9:07:46 12 Q. Are you married?

9:07:47 13 A. Yes.

9:07:49 14 Q. How long have you been married?

9:07:56 15 A. 58 years.

9:07:59 16 Q. Congratulations. That is amazing.

9:08:03 17 A. Two life sentences.

9:08:06 18 Q. What is your relationship, if any, to Dr. Craig  
9:08:12 19 Steven Wright?

9:08:12 20 A. I am his uncle.

9:08:18 21 Q. Are you his mother's brother?

9:08:22 22 A. Yes.

9:08:23 23 Q. So you're a maternal uncle?

9:08:26 24 A. Yes.

9:08:26 25 Q. Are you older or younger than Dr. Wright's



9:08:29 1 mother?

9:08:29 2 A. I am the eldest of the family.

9:08:37 3 Q. I'd like to ask you a few questions, if I  
9:08:40 4 could, about your background and your personal history.  
9:08:44 5 Mr. Lynam, could you please tell us a little bit about  
9:08:48 6 your background, your professional background?

9:08:55 7 A. Originally I was in the Air Force. I served  
9:08:58 8 nearly 30 years in the Air Force. I left the Air Force  
9:09:01 9 as a wing commander in the engineer branch. I served in  
9:09:10 10 many positions in Australia, in South-East Asia and I did  
9:09:15 11 a tour of exchange in the United States Air Force, at  
9:09:21 12 Nellis Air Force Base in Las Vegas. When I --

9:09:26 13 Q. You referred to the Air Force - the Australian  
9:09:29 14 Air Force. Is that the Royal Australian Air Force,  
9:09:31 15 Mr. Lynam?

9:09:32 16 A. Yes, the Royal Australian Air Force.

9:09:35 17 Q. Did you begin your career with the Royal  
9:09:40 18 Australian Air Force as a wing commander or did you, as  
9:09:44 19 you say, work your way up?

9:09:46 20 A. I worked my way up.

21 Q. What was your original position?

9:09:48 22 A. I started in 1957. January '57 I joined.

9:09:56 23 Q. And when you joined, what was the original  
9:09:59 24 position that you assumed with the Royal Australian Air  
9:10:03 25 Force?

9:10:04 1 A. I was a trainee.

9:10:14 2 Q. And from a trainee to a wing commander, what  
9:10:17 3 does that entail? How do you become a wing commander,  
9:10:23 4 beginning as a trainee?

9:10:25 5 A. Doing more things right than you do wrong.

9:10:34 6 Q. Were you ever recognized in any official way  
9:10:38 7 for your work?

9:10:41 8 A. Yes. The primary award is the Order of  
9:10:47 9 Australia. I'm a member of the Order of Australia.

9:10:51 10 Q. Could you tell us what that is, please.

9:10:54 11 A. Well, that's - Australia has a series of  
9:11:01 12 awards. The highest awards are those within the Order of  
9:11:06 13 Australia and they are for doing something of conspicuous  
9:11:13 14 good to the community or the organization around you.

9:11:19 15 Q. Is there a particular focus of recognition in a  
9:11:24 16 particular field that you were awarded with the  
9:11:31 17 membership of the Order of Australia?

9:11:33 18 A. Yes. It was in recognition of original work  
9:11:39 19 that I did in information technology in the general area  
9:11:43 20 of logistics management.

9:11:51 21 Q. In the hierarchy of the Royal Australian Air  
9:11:55 22 Force, is a wing commander considered a high position?

9:11:59 23 A. It is a senior officer position. It's  
9:12:02 24 equivalent to lieutenant colonel in the American forces.

9:12:08 25 Q. Did your work in Australia involve - I believe

9:12:14 1 you said this, but to be specific, did your work in  
9:12:18 2 Australia involve service overseas?  
9:12:21 3 A. Yes.  
9:12:23 4 Q. Where?  
9:12:24 5 A. In South-East Asia and in the United States.  
9:12:33 6 Q. And with respect to your work in South-East  
9:12:37 7 Asia, what did you do?  
9:12:40 8 A. I was there as maintenance support for  
9:12:47 9 squadrons of aircraft, and that was in Singapore, Panang  
9:12:55 10 and Ubon in Thailand during the Vietnam War.  
9:13:01 11 Q. I believe you mentioned that you also worked  
9:13:03 12 with the United States Air Force, is that correct?  
9:13:05 13 A. Yes. I was on exchange for two and a half  
9:13:09 14 years.  
9:13:15 15 Q. And what did you do or what service did you  
9:13:18 16 perform in that capacity with the United States Air  
9:13:22 17 Force?  
9:13:24 18 A. I held a number of positions. Do you want me  
9:13:28 19 to go through a summary of the main ones?  
9:13:32 20 Q. I would very much, thank you.  
9:13:34 21 A. I started off as the officer in charge of the  
9:13:42 22 flight line unit of approximately 328 people, which did  
9:13:47 23 all the weapons and avionics maintenance and operational  
9:13:55 24 support for 92 F-111A aircraft. During that period I was  
9:14:05 25 elevated, for some period of months, into the maintenance

9:14:11 1 supervisor for the whole of the avionics and weapons  
9:14:17 2 group, so that meant I also was responsible for the  
9:14:22 3 workshop maintenance, and all of that then was a total of  
9:14:27 4 750 people who worked for me, and I also was responsible  
9:14:33 5 for the four flight simulators as well. I then - there  
9:14:40 6 was what was called Operation Ready Switch at that time  
9:14:44 7 and our F-111s went to Mountain Home in Idaho and F-111Fs  
9:14:56 8 went to England and from England, a wing of F-4Ds -  
9:15:00 9 that's the Phantom aircraft - came to Nellis. They had  
9:15:05 10 to be - people had to be trained to maintain them and  
9:15:08 11 they had - that wing had to be regenerated. I started  
9:15:13 12 off as officer in charge of component repair squadron,  
9:15:19 13 which was - looked after all the heavy equipment and  
9:15:23 14 ground support equipment, metal work, all the heavy  
9:15:29 15 tasks, the ones that would appear to be less technical.  
9:15:33 16 I then moved from that and I became the commander of the  
9:15:41 17 428th aircraft maintenance unit, under the then  
9:15:45 18 production-oriented maintenance programme, where I was  
9:15:50 19 given a squadron of 24 aircraft, so they sort of belonged  
9:15:56 20 to me and I hired them out to the flight crews and so I  
9:16:01 21 was responsible for the 24 F-4Ds and their operations and  
9:16:08 22 maintenance and approximately 250 maintenance people.

9:16:19 23 Q. When you completed your work with United States  
9:16:24 24 Air Force, did you go back to Australia?

9:16:29 25 A. Yes.

9:16:33 1 Q. And what did you do when you went back to  
9:16:36 2 Australia? Did you stay in the military at that time?

9:16:42 3 A. I went into headquarters unit in Melbourne, in  
9:16:49 4 what is called support command. I went through a few  
9:16:54 5 positions there, but it was all focused on development of  
9:17:00 6 management systems and training other people. The  
9:17:07 7 primary area, and the area in which I earned the Order of  
9:17:11 8 Australia, was when I headed a group called the  
9:17:14 9 development of management systems and we developed some  
9:17:19 10 very good things that got the recognition, and that was a  
9:17:23 11 system for configuration management of all weapon systems  
9:17:32 12 in the Air Force and it also gave the capability for  
9:17:39 13 programme budgeting, which, as I understand, was then a  
9:17:46 14 world first and a two star general came out and spent  
9:17:50 15 some time looking at that, because the United States Air  
9:17:54 16 Force was very interested in that too. And I also  
9:17:59 17 developed a case tool, a computer-aided software  
9:18:05 18 engineering tool, which we called Menagerie, which was a  
9:18:10 19 mix-up of some of the initials of the people who were in  
9:18:15 20 that. I was the creative author of that and the other  
9:18:23 21 support staff supported me and did a lot of the running  
9:18:29 22 and one man, Nicholas Jones, he was my code cutter, and  
9:18:35 23 he was absolutely marvellous. He was a fellow very much  
9:18:40 24 like Craig Wright, with a brain that is incredible, very  
9:18:44 25 few social skills, but he had a magic memory and an

9:18:52 1 incredible brain.

9:18:57 2 Q. Did your work experience with computers  
9:19:06 3 continue after that?

9:19:09 4 A. Yes. I left the Air Force for no particular  
9:19:20 5 good reason - in fact, it got me into a lot of trouble  
9:19:23 6 with my wife - but I was going to be posted to Canberra,  
9:19:27 7 to the Department of Defence in Canberra, and I felt I  
9:19:32 8 didn't want to go, so I joined the Defence Credit Union  
9:19:39 9 as the national business development manager and I was  
9:19:43 10 there until I got offered a position at the State  
9:19:47 11 Electricity Commission and there I went into software  
9:19:50 12 development again and I headed a development team of 23  
9:20:01 13 designers and code cutters, so I managed all the State  
9:20:11 14 Electricity Commissions and we developed - we rebuilt the  
9:20:14 15 whole thing, for logistics, supply and transport.

9:20:22 16 Q. During this period of time in your career,  
9:20:32 17 where you went from the Royal Australian Air Force to the  
9:20:38 18 United States Air Force, to South-East Asia, to the State  
9:20:43 19 Electricity Commission in Victoria, did Dr. Craig Wright  
9:20:47 20 know about your work?

9:20:51 21 A. Yes, he did. I was given the impression that  
9:20:59 22 he held me up as a little bit of a model for his life; he  
9:21:08 23 admired me. That was very flattering, but for no  
9:21:16 24 particular reason that I knew, he just held me up as a  
9:21:21 25 little bit of an image for him to emulate, but he's a lot

9:21:27 1 smarter than I am.

9:21:31 2 Q. Did he, in some ways, do you believe, or is it  
9:21:35 3 your understanding, followed you as a role model?

9:21:44 4 A. He certainly has said to me a number of times  
9:21:46 5 that I was a role model for him and he did go in and join  
9:21:53 6 the Air Force and I believe he applied as well to go into  
9:21:56 7 the academy and certainly he had all the mental acuity  
9:22:07 8 and education that was necessary, but he didn't get into  
9:22:12 9 the academy and I understand - and, of course, I haven't  
9:22:17 10 seen any documents, I don't know, it's hearsay - I  
9:22:21 11 understand that he didn't succeed on the basis of his  
9:22:29 12 personality and I think we all know that Craig is not  
9:22:36 13 known for his people skills.

9:22:44 14 Q. Mr. Lynam, I'd like to ask you about  
9:22:49 15 Dr. Wright's relationship with his grandfather and the  
9:22:56 16 family influences on Dr. Wright.

9:22:59 17 A. Okay.

9:23:00 18 Q. Do you believe or is it your understanding that  
9:23:05 19 you have a close relationship and have always had a close  
9:23:09 20 relationship with Dr. Wright?

9:23:11 21 A. Your voice faded there. Did I have a close  
9:23:14 22 relationship with Craig?

9:23:16 23 Q. Yes.

9:23:19 24 A. It wasn't terribly close, it wasn't really much  
9:23:24 25 closer than you would expect of an uncle, I don't think.

9:23:29 1 He was very close to my father, his grandfather, from  
9:23:34 2 when he was a very small boy and he used to be cared for  
9:23:41 3 by my parents with day care some of the time during  
9:23:49 4 school holidays and he used to spend time with my father  
9:23:55 5 in his hamshack. Do you know what that is?

9:24:00 6 Q. No, I don't.

9:24:04 7 A. Amateur radio.

9:24:06 8 Q. What is a hamshack?

9:24:08 9 A. Amateur radio. My father was a radio engineer  
9:24:11 10 and so he had a whole lot of technical paraphernalia  
9:24:15 11 there, which Craig found absolutely intriguing, and he  
9:24:22 12 spent all the time he could with my grandfather. Later  
9:24:28 13 on, though, Craig, especially when the internet started,  
9:24:36 14 in about the early 90s, Craig started to contact me and  
9:24:43 15 my son much more often, but Craig had been down and had  
9:24:50 16 stayed with us - yes, I'm sorry, go ahead.

9:24:53 17 MR. BRENNER: I hate to interrupt - technology -  
9:24:55 18 you said when something started, something like  
9:24:58 19 "intimate", "inimit". I didn't know what that word was.  
9:25:00 20 I apologize.

9:25:01 21 MS. McGOVERN: "Internet".

9:25:02 22 MR. BRENNER: "Internet"?

9:25:04 23 THE DEPONENT: Yes.

9:25:04 24 MR. BRENNER: Thank you. I apologize.

9:25:06 25 THE DEPONENT: The internet really started up in



9:25:11 1 the early 1990s. It was running before that, but it  
9:25:16 2 became - started to become really capable then. Also,  
9:25:22 3 Craig and my son were of the age to be deeply involved in  
9:25:27 4 that sort of technology and they were also deeply  
9:25:31 5 involved in terms of socializing on the internet as well.  
9:25:38 6 So they communicated quite a bit and Craig also  
9:25:42 7 communicated regularly with me - not so much on the  
9:25:48 8 internet; he would telephone me and send me emails. As  
9:25:53 9 he went along in his life, he would call me up and talk  
9:25:57 10 about what he was doing, he would send me papers that he  
9:26:04 11 was preparing and writing and he would send them usually  
9:26:10 12 in an early form and then in the finished form. I never  
9:26:15 13 really knew whether he wanted me to work as a wordsmith  
9:26:19 14 for him and go through and correct his expression and  
9:26:28 15 layout, but I was always happy that, by the end time he  
9:26:34 16 actually submitted the papers, he got the papers well  
9:26:38 17 presented or somebody helped him straighten them out and  
9:26:48 18 get the presentation as good as the content. His  
9:26:54 19 continued --

20 BY MS. McGOVERN:

9:26:56 21 Q. Mr. Lynam, if I could interrupt you for a  
9:26:59 22 second and go back to the grandfather.

9:27:01 23 A. Yes.

9:27:02 24 Q. I believe you testified that Dr. Wright was  
9:27:04 25 very close to his grandfather, is that right?

9:27:09 1 A. That's certainly correct, and --

9:27:12 2 Q. In your opinion, based upon your involvement  
9:27:18 3 with Dr. Wright and, of course, your relationship with  
9:27:23 4 your own father, do you believe that Dr. Wright's  
9:27:28 5 grandfather was an important influence on Dr. Wright's  
9:27:32 6 life and work?

9:27:34 7 A. I think that my father, Craig's grandfather,  
9:27:40 8 had a great influence on him. As I said, as a child he  
9:27:44 9 used to go to my parents' house and stay there for child  
9:27:50 10 care during school holidays and so on, but my father, he  
9:27:56 11 was a radio engineer, he was one of the earliest senior  
9:28:08 12 radio engineers in Australia, radio and electronic  
9:28:12 13 engineers, and indeed, he was first in a lot of  
9:28:17 14 achievements. He went into the - this is getting to the  
9:28:24 15 influence - he went into the Australian Army at the  
9:28:30 16 beginning of World War II and he went into the signals  
9:28:35 17 division and although he continued to wear the signals  
9:28:44 18 badges, he actually belonged to a small intelligence  
9:28:49 19 group and they were made up of very few people from  
9:28:55 20 British intelligence, United States intelligence and  
9:28:59 21 Australian intelligence. My father also did electronics  
9:29:09 22 work during some of the same time and he wrote a thesis  
9:29:13 23 which was top secret, and I still never succeeded in  
9:29:20 24 getting it released so I could have it, and I think Craig  
9:29:24 25 attempted to get it too, but it's all locked up for some

9:29:29 1 reason, for the early warning radar along the Queensland  
9:29:36 2 coast during the war. A little - my father went with  
9:29:46 3 General McArthur, he was actually on General --

9:29:49 4 Q. Mr. Lynam, was your - in cryptology?

9:29:54 5 A. Yes, he was an expert in cryptology, spoke  
9:29:58 6 multiple languages and he did interrogate high-value  
9:30:09 7 prisoners of war - that was in Australia - even though  
9:30:19 8 officially at the time those people never came into  
9:30:22 9 Australia, but they actually did, into an area called  
9:30:26 10 Indooroopilly. He - as I said, he was on General  
9:30:34 11 McArthur's staff and he reported to General McArthur's  
9:30:40 12 number 2, and I forget his name. I think he was a four  
9:30:46 13 star general. But when McArthur went back to the  
9:30:53 14 Philippines, when he returned to the Philippines, my  
9:30:58 15 father went as part of that headquarters core group and  
9:31:03 16 he was also involved in the code breaking for the - in  
9:31:12 17 the Coral Sea battle, which was - and that code breaking,  
9:31:16 18 a lot of that was instrumental in winning the battle  
9:31:20 19 against - the Coral Sea battle against the Japanese.

9:31:28 20 Q. Is that the Enigma code, Mr. Lynam? Are you  
9:31:32 21 referring to the Enigma code?

9:31:35 22 A. Now, I don't know what code the Japanese did.  
9:31:38 23 However, it was - he had the connections as well with  
9:31:45 24 Bletchley Park in the United Kingdom and they had the  
9:31:49 25 code-breaking machine that was so famous a movie has been

9:31:55 1 brought about it, and I can't remember if that was the  
9:31:58 2 Enigma code or not, but anyway, the Japanese codes were  
9:32:06 3 broken by them and so that gave the allied side, the  
9:32:10 4 Australians and the Americans - mostly Americans. We  
9:32:18 5 didn't have that many ships - but gave them a great  
9:32:22 6 advantage to win the war in the Coral Sea. Now --

9:32:29 7 Q. Mr. Lynam, did your father bring to his home  
9:32:34 8 Japanese influences that Craig - that Dr. Wright would  
9:32:42 9 have witnessed or experienced while he was growing up?

9:32:48 10 A. Absolutely. Throughout the time there were  
9:32:53 11 paintings that my father did in the Philippines, he did  
9:32:58 12 some oil paintings, and they were displayed in the house  
9:33:01 13 and Craig always admired them because they were done by  
9:33:05 14 his grandfather. Also, down in that hamshack my father  
9:33:11 15 kept some of his old souvenirs and one of the things that  
9:33:18 16 was there was a carton, a reasonable-sized carton, of  
9:33:25 17 occupation money, which he brought back from the  
9:33:30 18 Philippines - this is Japanese occupation money for -  
9:33:36 19 intended for when they occupied Australia. Fortunately,  
9:33:40 20 they didn't make it, but my father made it back with some  
9:33:43 21 of their money, a great deal of the money. So Craig was  
9:33:49 22 able to play with that --

9:33:51 23 Q. Did Dr. --

9:33:53 24 MR. BRENNER: Hold on. I think he's in the middle  
9:33:56 25 of an answer.

9:33:58 1 THE DEPONENT: Yes.

2 BY MS. McGOVERN:

3 Q. Go ahead. Sorry.

9:33:58 4 A. Craig was able to play with that, as well as  
9:34:00 5 some other odds and ends that my father had down there in  
9:34:05 6 his shack.

9:34:09 7 Q. Mr. Lynam, did Dr. Wright show an interest in  
9:34:12 8 the Japanese culture?

9:34:16 9 MR. BRENNER: Object to the form.

9:34:17 10 THE DEPONENT: He certainly did. That interest  
9:34:21 11 developed with my father talking about the Japanese and  
9:34:25 12 their culture, but after 1975, when the Secrets Act  
9:34:34 13 allowed my father to talk, because he had a complete  
9:34:40 14 security close in on him for 30 years after the war and,  
9:34:47 15 in fact, he used to have surveillance, right up until  
9:34:53 16 1975, outside my parents' house. There would often be -  
9:34:59 17 very often be a car out there with two people just  
9:35:04 18 observing, to make sure that the wrong people were not  
9:35:09 19 coming in and going out. I have no idea what they  
9:35:13 20 feared, but nevertheless, he was tightly contained.  
9:35:18 21 After that, he talked a lot more freely with Craig and he  
9:35:22 22 talked a lot more freely about cryptology and all his  
9:35:28 23 mathematics and so on and he actually did introduce Craig  
9:35:35 24 to a - who became a professor of mathematics in the  
9:35:44 25 United Kingdom, and he was one of the people at

9:35:48 1 Bletchley Park who developed that code breaking and my  
9:35:53 2 father had kept the contact all those years. Craig was  
9:36:00 3 thrilled to be able to contact and speak to this  
9:36:05 4 professor and he was thrilled when he said, "Yeah, I  
9:36:10 5 absolutely know Ronald Lynam and we did great work  
9:36:19 6 together." So that influenced him --

9:36:20 7 Q. Do you recall the professor's name, Mr. Lynam,  
9:36:24 8 do you recall the professor's name?

9:36:26 9 A. I certainly don't, but if you were to ask Craig  
9:36:28 10 that, I'm sure he probably would, because he was very  
9:36:33 11 impressed by the man.

9:36:36 12 Q. Would you describe Dr. Wright as having the  
9:36:41 13 intellectual capability of speaking on an equal level  
9:36:45 14 with his grandfather about these types of things, like  
9:36:49 15 mathematics and cryptology?

9:36:52 16 A. Yes. In fact, my father had trouble - he was a  
9:36:57 17 little bit like Craig, actually, and very - he wasn't  
9:37:06 18 forward socially at all, he was very, very much almost a  
9:37:12 19 machine himself, with his brain ticking over with all of  
9:37:18 20 his plans and the things he wanted to build and do and so  
9:37:22 21 on, but with Craig, he could sit down and they would open  
9:37:29 22 up and talk to one another for hours, and this also was  
9:37:36 23 after Craig was an adult, and Craig, I think, was greatly  
9:37:43 24 enthralled by all the discussion about security, spy-type  
9:37:52 25 work, cryptology and all of that that happens behind the

9:38:04 1 scenes, but it wasn't until 1975 that my father could  
9:38:09 2 talk about it and he really didn't tell me anything about  
9:38:11 3 it either, except I would remember at times he would  
9:38:17 4 point out the surveillance he was having. I remember  
9:38:24 5 even going to a hotel and having a couple of beers at the  
9:38:28 6 bar and he'd point out, "That guy there, he is keeping an  
9:38:33 7 eye on us", and so on. But the training my father had  
9:38:37 8 was absolutely incredible, he could do marvellous things,  
9:38:41 9 and this greatly impressed Craig and they enjoyed talking  
9:38:48 10 about it, often to the great annoyance of my mother, who  
9:38:56 11 had great resistance to talking about anything that had  
9:39:01 12 connections to the Japanese or talking about topics -  
9:39:08 13 highly technical topics that she had no understanding of  
9:39:12 14 whatsoever. So she used to express her disapproval very  
9:39:17 15 often.

9:39:20 16 Q. And did Dr. Wright, to your knowledge and  
9:39:24 17 understanding, in fact pursue his interest in  
9:39:35 18 mathematics, cryptology and security, internet security  
9:39:48 19 related fields of interest?

9:39:50 20 A. Well, yes, it seems to me that he became quite  
9:39:55 21 obsessed down that path. Cryptology was a core part of  
9:39:59 22 it and, of course, in order to do that, you've got to  
9:40:04 23 learn an awful lot about some of the disciplines of  
9:40:07 24 security and a very, very deep level of quite esoteric  
9:40:13 25 mathematics. But Craig got many, many cryptology

9:40:26 1 recognitions and qualifications, to the extent that I  
9:40:35 2 believe he was one of the top three in the world and that  
9:40:43 3 was in an organization, a global organization, and I just  
9:40:48 4 cannot remember what it was called, but it had several  
9:40:52 5 initials by which it was generally known, and Craig  
9:40:58 6 became the CEO of all the Oceania area of the world for  
9:41:12 7 that organization. He went - he trained defense forces,  
9:41:22 8 he trained the police, including the New South Wales  
9:41:25 9 police in New South Wales - yes, in New South Wales, in  
9:41:36 10 security, internet security and cryptography, I believe.

9:41:43 11 Q. Mr. Lynam, are you familiar with anything that  
9:41:46 12 Dr. Wright developed involving token systems?

9:41:53 13 A. With tokens?

9:41:54 14 MR. BRENNER: "Token systems" did you say?

9:42:00 15 MS. McGOVERN: Token systems.

9:42:03 16 THE DEPONENT: Yes, yes. He did work --

17 BY MS. McGOVERN:

9:42:09 18 Q. Can you tell us about that, please?

9:42:10 19 A. Yes. He did work for organizations like - I  
9:42:15 20 think Centrebet it was called, but I think that was  
9:42:18 21 security rather than tokens, but for Lasseters Casino he  
9:42:27 22 did develop what I understand to be the world's first  
9:42:33 23 token system enabling global gambling, internet gambling,  
9:42:44 24 using all Fiat currencies, all international currencies,  
9:42:52 25 so basically doing the same type of thing as Bitcoin, a



9:42:56 1 universal token system which Lasseters Casino could use,  
9:43:05 2 so that people from anywhere in the world could come in,  
9:43:09 3 buy their tokens and gamble and it was directly  
9:43:13 4 translatable back into any other Fiat currency. So that,  
9:43:21 5 I believe, was the precursor of Bitcoin.

9:43:25 6 Q. Do you recall when that was? Do you recall the  
9:43:27 7 year that Dr. Wright created this first system --

9:43:44 8 A. I think --

9:43:44 9 MR. BRENNER: Before you start, I'll object to that  
9:43:46 10 question, to the form of that last question, to the  
9:43:49 11 extent that's what he's answering. I think you should  
9:43:53 12 probably ask another question so we get a clear record.

9:43:56 13 MS. McGOVERN: Yep.

9:44:00 14 BY MS. McGOVERN:

9:44:05 15 Q. Dr. Lynam, do you recall the year in which  
9:44:08 16 Dr. Wright invented the first token system enabling the  
9:44:17 17 multi-currency casino gambling that you've just testified  
9:44:22 18 about, do you recall when that --

9:44:25 19 MR. BRENNER: Object to the form.

9:44:27 20 THE DEPONENT: To the best of my recollection, that  
9:44:29 21 is 2007.

9:44:30 22 BY MS. McGOVERN:

9:44:36 23 Q. Dr. Lynam, up until 2007, when Dr. Wright  
9:44:43 24 invented this token system that you just referred to and  
9:44:47 25 throughout what you've described as his development in

9:44:50 1 his life, did you ever hear Dr. Wright refer to an  
9:44:55 2 individual named David Kleiman?

9:44:59 3 MR. BRENNER: Object to the form.

9:45:00 4 THE DEPONENT: No, I did not.

9:45:06 5 BY MS. McGOVERN:

9:45:06 6 Q. Are you familiar with a paper that has been -  
9:45:15 7 has become known as the white paper?

9:45:20 8 A. The Bitcoin white paper?

9:45:23 9 Q. Yes. Are you familiar with the Bitcoin white  
9:45:28 10 paper, Mr. Lynam?

9:45:29 11 A. Yes, I am. I received the advance and pretty  
9:45:37 12 rough copy of it in 2008. I think it was probably  
9:45:47 13 mid-2008. Craig sent me a copy for my review, but it was  
9:45:55 14 far too technical for me and also was poorly written, but  
9:46:01 15 I didn't want to offend him by saying I'd go in and start  
9:46:05 16 correcting his structure in English, but I probably would  
9:46:10 17 have because sometimes I'm cheeky enough to do that, but  
9:46:14 18 it was way above me technically with a lot of what was in  
9:46:19 19 it.

9:46:23 20 Q. When Dr. Wright provided you with the - what I  
9:46:27 21 believe you referred to as sort of a rough draft of the  
9:46:31 22 Bitcoin white paper --

9:46:32 23 A. Yes.

9:46:34 24 Q. -- what was your understanding of what the  
9:46:36 25 Bitcoin white paper was about?

9:46:40 1 A. Well, it wasn't called the Bitcoin white paper  
9:46:43 2 then, I'm pretty certain it did not have such a heading,  
9:46:51 3 and I think the determination of the actual name was  
9:46:57 4 still floating at the point I got the white paper, but it  
9:47:04 5 was clearly to be a digital monetary system and it is  
9:47:15 6 very difficult for me to remember back that far as to  
9:47:20 7 what was postulated as possible names for the coin, but I  
9:47:28 8 don't think the paper was headed "Bitcoin". But I have  
9:47:38 9 no doubt in my mind that that was the precursor because  
9:47:41 10 it had the same content as the paper that came out, or  
9:47:45 11 very similar content.

9:47:48 12 Q. What was - with respect to the digital currency  
9:47:57 13 that you just testified to --

9:48:01 14 A. Yes.

9:48:02 15 Q. -- was it your understanding that Dr. Wright  
9:48:04 16 created the digital currency system that you just  
9:48:09 17 testified to?

9:48:10 18 MR. BRENNER: Object to the form.

9:48:12 19 THE DEPONENT: Yes. I thought it was a natural  
9:48:16 20 flow-on from some of the work that he'd been doing over  
9:48:21 21 the years, the mathematics and the cryptography, and he  
9:48:27 22 had been playing around with other digital currency  
9:48:31 23 systems which existed earlier than that and the fact he  
9:48:37 24 was working with banks and large accounting firms and so  
9:48:42 25 on as well I think also prompted him to think down those

9:48:46 1 same lines, and then it flowed on directly from the  
9:48:54 2 Lasseters token system, but I never saw any documentation  
9:48:59 3 on the Lasseters token system, he just wrote to me about  
9:49:04 4 it or told me about it and I took the flow-on from that  
9:49:09 5 directly to the - what we now call the Bitcoin paper, to  
9:49:16 6 be a direct flow-on, and there wasn't a big gap in time,  
9:49:22 7 anyway, a terribly big gap in time.

9:49:25 8 Q. That was my next question, Mr. Lynam. When you  
9:49:27 9 received the white paper in rough form and when  
9:49:33 10 Dr. Wright - you testified your understanding was that  
9:49:37 11 Dr. Wright had created a digital currency system?

9:49:41 12 A. Yes.

9:49:42 13 Q. Was this something that surprised you about  
9:49:44 14 Dr. Wright? Did it appear to sort of come out of the  
9:49:48 15 blue?

9:49:49 16 MR. BRENNER: Object to the form.

9:49:53 17 BY MS. McGOVERN:

9:49:53 18 Q. You can answer.

9:49:54 19 A. You're talking about the fact that the paper  
9:49:58 20 arrived there? No, I wasn't terribly surprised because  
9:50:06 21 it seemed to me to be just simply a continuation of his  
9:50:12 22 interest in that topic that led from the Lasseters token  
9:50:17 23 system. What --

9:50:20 24 Q. Mr. Lynam --

9:50:25 25 A. Yes - I'm sorry.

9:50:25 1 Q. I'm sorry, go ahead.

9:50:26 2 A. What did surprise me was later on, when it came  
9:50:30 3 to the point he said he was planning actually to do it,  
9:50:34 4 to create the Bitcoin and he was going to then publish it  
9:50:47 5 as - with a pseudonym. I thought, "Well, that's an odd  
9:50:53 6 thing to do" and I asked him why are you going to do it,  
9:50:57 7 instead of getting the credit for yourself, and he said  
9:51:03 8 well, he felt it was - since it was a monetary system, it  
9:51:07 9 was important - and he didn't know exactly where it would  
9:51:12 10 go, it was important to protect the privacy of himself  
9:51:16 11 and his family, but then he said "Satoshi Nakamoto".

9:51:27 12 That was a bit of a surprise but it didn't amaze me  
9:51:31 13 because of his attachment to all things Japanese and the  
9:51:37 14 fact that in his bedroom he had a katana, a Japanese  
9:51:42 15 sword, there, as well as all sorts of other Japanese  
9:51:48 16 things. He had these little devices that - I don't know  
9:51:52 17 where they came from, where he could buy them, but things  
9:51:57 18 that ninjas, in historic times, used to throw. These  
9:52:02 19 would have been toys, of course, but the sword was real.  
9:52:08 20 So being Satoshi Nakamoto was a surprise but not a shock.  
9:52:15 21 I asked him how did he come up with that name and he told  
9:52:20 22 me that he named it - I understood he was telling me it  
9:52:29 23 was two philosophers. One was of the ilk of Adam Smith,  
9:52:36 24 of whom you're probably familiar. He was a Scottish  
9:52:42 25 philosopher economist and he wrote the book The Wealth of

9:52:48 1 Nations and one of the big projections in that book was  
9:52:53 2 the power of incentive and reward. Now, the other one  
9:53:05 3 was - I thought it was a separate Japanese philosopher,  
9:53:11 4 but he spoke about moral and ethical conduct. Now, with  
9:53:17 5 Bitcoin, Craig was pushing that this can be a legal  
9:53:26 6 system of exchange and transaction and also the fact that  
9:53:34 7 you pay every step along the way, even though minuscule  
9:53:42 8 payments. What is presented through the Bitcoin block  
9:53:47 9 chain channels is all motivated by incentives and rewards  
9:53:52 10 and thus Adam Smith, or a Japanese style of Adam Smith,  
9:53:59 11 was what convinced him to go that way, and so that  
9:54:05 12 convinced me. It sounded logical and it sounded Craig.

9:54:12 13 Q. Mr. Lynam, did Dr. Wright ever give you any  
9:54:18 14 impression that he was not the sole creator of the block  
9:54:32 15 chain?

9:54:45 16 MR. BRENNER: Object to the form. You can answer,  
9:54:57 17 sir.

9:54:57 18 THE DEPONENT: Can I explain in several words, to  
9:55:01 19 explain a concept, also from my own experience?

20 BY MS. McGOVERN:

9:55:06 21 Q. Of course.

9:55:09 22 MR. BRENNER: The same objection.

9:55:10 23 THE DEPONENT: When I created the case tool that I  
9:55:16 24 spoke to you about, the computer aided software  
9:55:20 25 engineering tool, I had a small cell of people who were

9:55:24 1 expert at doing certain things and some of them were  
9:55:29 2 basically just gofers as well, getting information for  
9:55:33 3 me, but for the code cutting, I was never a code cutter,  
9:55:39 4 never competent at it, whereas Nicholas A. Jones was just  
9:55:45 5 incredible. He didn't come up with any of the creative  
9:55:48 6 ideas whatsoever, I did that, but he was able to act as a  
9:55:57 7 direct reference into the COD manual on relational  
9:56:03 8 databases and he could encode with such incredible skill  
9:56:09 9 that there was no point competing with him. Now, I was  
9:56:14 10 definitely the creative author of that, there was never  
9:56:17 11 any doubt about that, but people helped me, they were  
9:56:23 12 part of the team and we put the whole package together.  
9:56:27 13 Commonsense tells me that Craig had people help him and I  
9:56:37 14 know there is a person, who Craig would not reveal to me  
9:56:49 15 because Craig worked for - with him, I should say, in a  
9:56:56 16 different security-related field, which is something I  
9:57:01 17 just cannot talk about. He - if I can step forward a  
9:57:11 18 bit. A fellow joined the team out of the blue and  
9:57:18 19 actually did quite a bit of coding, I think, and his name  
9:57:22 20 was Hal Finney - I'm almost certain it was Hal Finney -  
9:57:31 21 because Hal Finney, after the Bitcoin went live, and it  
9:57:38 22 was open-source software, you'll recall, and he found  
9:57:45 23 faults in it. He was setting up a node to do mining, one  
9:57:51 24 of many people doing that, and so he contacted Craig - or  
9:57:56 25 he believed he was contacting Satoshi Nakamoto - and

9:58:01 1 said, "I've found this problem. I believe I can fix it.  
9:58:06 2 Can I sort of become involved with you and do these  
9:58:10 3 things?" And so I think Hal Finney did quite a bit, but  
9:58:18 4 I don't know of anybody else by name who did major  
9:58:27 5 contributions to any of the work.

9:58:29 6 BY MS. McGOVERN:

9:58:32 7 Q. Did Dr. Wright ever mention to you that in the  
9:58:35 8 creation of the block chain, he was working with an  
9:58:39 9 individual in West Palm Beach, Florida named David  
9:58:45 10 Kleiman?

9:58:46 11 A. No, he did not.

9:58:47 12 MR. BRENNER: Object to the form.

9:58:49 13 THE DEPONENT: However - although it wasn't until  
9:58:53 14 recently, that I recall - because when this came up, I  
9:58:58 15 started doing a little research to try to refresh my  
9:59:02 16 mind. I had heard of, but never discussed with Craig,  
9:59:12 17 Dave Kleiman because at one stage he published a number  
9:59:18 18 of books - Craig produced books or training guides for  
9:59:28 19 people like the police forces and so on - and I noticed,  
9:59:36 20 when looking at the book covers, lo and behold there was  
9:59:42 21 Dave Kleiman/Craig Wright as co-authors and one of the  
9:59:48 22 books actually had Dave Kleiman as an author, with Craig  
9:59:55 23 as contributor. But had Craig ever spoken to me about  
0:00:06 24 David Kleiman? Absolutely not. And as for involvement  
0:00:09 25 with Bitcoin, never ever did he mention it in that



0:00:17 1 context.

0:00:18 2 BY MS. McGOVERN:

0:00:21 3 Q. And with respect to the books that you're  
0:00:24 4 referring to, you became familiar with the books they  
0:00:29 5 co-authored on your own, this was not - if I understand  
0:00:33 6 your testimony correctly --

0:00:34 7 A. No.

0:00:34 8 Q. -- this was not Dr. Wright speaking to you  
0:00:37 9 about David Kleiman, is that right?

0:00:41 10 A. Back in the time when Craig was doing a lot of  
0:00:48 11 cryptography work, he sent me papers, he sent me - via  
0:00:55 12 the internet he sent the papers - he sent me images of  
0:01:00 13 cards and he also sent me image of some of the books, so  
0:01:06 14 I had actually seen those back in the - I think around  
0:01:14 15 the mid-2000s.

0:01:20 16 Q. Mr. Lynam, those books don't have anything to  
0:01:25 17 do with the block chain, correct?

0:01:27 18 A. Nothing whatsoever, but I had never noted Dave  
0:01:36 19 Kleiman, Craig didn't talk to me in particular about him,  
0:01:38 20 he just showed the books, and I had completely forgotten  
0:01:44 21 the name until I went back researching and found images  
0:01:49 22 of the books on the internet and then I said, "Bang,  
0:01:53 23 there's Dave Kleiman on the books." So I just want to  
0:01:58 24 come out absolutely clear with that. No, Craig didn't  
0:02:01 25 discuss with me, it had nothing - I had no knowledge of

0:02:04 1 Dave Kleiman actually, but I did see his name as a  
0:02:10 2 co-author with Craig in the mid-2000s.

0:02:17 3 Q. But just to be clear with respect to your  
0:02:19 4 testimony, the books that you're referring to were not  
0:02:23 5 books concerning cryptology or the Bitcoin block chain,  
6 correct?

0:02:28 7 A. They did cover security in cryptology but they  
0:02:32 8 did not in any way talk about block chain or Bitcoin,  
0:02:40 9 completely separate. They were training books for  
0:02:44 10 security forces and that certainly had nothing to do with  
0:02:49 11 any form of digital money or block chain. The target of  
0:02:54 12 the books was totally different.

0:02:59 13 Q. Mr. Lynam, did there come a point in time when  
0:03:04 14 Dr. Wright needed an extensive network of computers, that  
0:03:10 15 you became aware of?

0:03:11 16 A. Yes. As soon as he went live with Bitcoin,  
0:03:18 17 which was in the beginning of 2009 - part of the  
0:03:25 18 operating principle of Bitcoin is that there is as big as  
0:03:31 19 possible, I understand, network of computers hooked up to  
0:03:36 20 run nodes and to do mining and this is what creates the  
0:03:43 21 proof of work and the verification of all the  
0:03:49 22 transactions, so he wanted as big - he wanted millions,  
0:03:56 23 if he could get them, to sign up and do it.

0:04:01 24 Q. Mr. Lynam, did you offer to run a node on his  
0:04:05 25 behalf?

0:04:05 1 A. Yes. When Craig was telling me about it - he  
0:04:08 2 didn't call me to ask about it, but he told me he's going  
0:04:13 3 live, to let me know, and ran through a little bit of  
0:04:19 4 what he needed and I said, "Well, look, I've got an  
0:04:25 5 almost brand new Dell XPS computer that's pretty hot.  
0:04:31 6 How about I run one of these nodes for you?" And he  
0:04:35 7 said, "You'd do that?" And I said, "Yeah. Great." So I  
0:04:41 8 did that and I think I'm glad I did it, I think I - I  
0:04:51 9 hope it was beneficial for him, but he sent me software,  
0:04:56 10 I think via FTP, with the instructions on how to put it  
0:05:03 11 in there and set it up and my role from then on was just  
0:05:08 12 simply to keep it going 24/7 and my computer was  
0:05:15 13 excellent in that that particular computer had a little  
0:05:19 14 video screen on the box, so I could monitor the task  
0:05:25 15 manager and see that it was processing, how much  
0:05:27 16 processing load there was, and that it was always  
0:05:31 17 running, even with the screen, and all that sort of  
0:05:35 18 thing, turned off. So that was great. I had to upgrade  
0:05:39 19 the computer, though, even though it was a hot computer,  
0:05:44 20 because it actually did become hot, there seemed to be  
0:05:47 21 such a computing load that it ran hot, and so I upgraded  
0:05:57 22 the power supply. The box, I think, came - the 450 watt  
0:06:04 23 power supply. I upgraded it to a 750 watt. I put in a  
0:06:09 24 fan in the front of the box. It was well designed to be  
0:06:14 25 able to take a fan there. So my lovely quiet, fancy

0:06:19 1 desktop, that was whisper quiet, from then on, was a  
0:06:24 2 noisy machine going 24 hours a day, and I think probably  
0:06:28 3 added to my electricity bill, but anyway. So it - so I  
0:06:34 4 kept that running and that kept running, with very few  
0:06:40 5 interruptions. It had interruptions only because I did  
0:06:43 6 things like upgrading it. I upgraded it to have a pair  
0:06:48 7 of RAID disks, running as RAID 1, to give it better  
0:06:52 8 robustness, and also I believe I upgraded the RAM - I  
0:07:04 9 think then the computer only took 16 gig - upgraded the  
0:07:11 10 RAM and did anything else I could to make it more robust  
0:07:17 11 and reliable.

0:07:20 12 Q. Mr. Lynam, have you received any compensation  
0:07:24 13 from Dr. Wright in connection with the running of the  
0:07:27 14 node during that period of time?

0:07:32 15 A. No, not at all. There was nothing I was  
0:07:36 16 supposed to do, except run it, and then it was in his  
0:07:45 17 hands. He did contact me again, not very long after --

18 MR. BRENNER: Who's talking?

0:07:47 19 THE DEONENT: He did contact me again, not long  
0:07:50 20 after the initial kickoff, to replace the software  
0:08:03 21 because the original software was defective in some way  
0:08:07 22 and that's when I first heard of this fellow Hal Finney,  
0:08:12 23 because apparently Hal Finney had something to do with  
0:08:15 24 highlighting a problem and contributing some work on the  
0:08:23 25 open-source software to fix it. So I got a new version

0:08:27 1 of the software to install and I installed that and then  
0:08:36 2 it just ran until, I think, early in 2011, when, not  
0:08:45 3 hearing anything from Craig, and also the load on the  
0:08:56 4 system wound right down, so obviously my machine was no  
0:08:59 5 longer contributing, probably because a lot more machines  
0:09:04 6 were out there, and a lot more powerful machines, so then  
0:09:09 7 I turned it off, in 2011.

8 BY MS. McGOVERN:

0:09:16 9 Q. Mr. Lynam, based upon your relationship with  
0:09:19 10 Dr. Wright and your interactions with Dr. Wright over  
0:09:24 11 this period of time that we're talking about, which has  
0:09:29 12 brought us to 2011, do you have any reason to believe  
0:09:35 13 that Dr. Wright is not the sole author of the Bitcoin: A  
0:09:55 14 Peer-to-Peer Electronic Cash System white paper?

0:10:01 15 MR. BRENNER: Object to the form.

0:10:05 16 THE DEPONENT: No. I had no doubts in my mind  
0:10:10 17 whatsoever that he was the sole creative author. That is  
0:10:18 18 not saying that other people don't contribute to  
0:10:21 19 open-source software, they do, that's the nature of it,  
0:10:25 20 but he's the sole creative author and I still have not  
0:10:31 21 seen anything of substance - I hear lots of questions and  
0:10:37 22 lots of doubts, but I have not seen anything of substance  
0:10:41 23 to shake me in that belief, he just went through those  
0:10:46 24 years and it just seemed to flow and I had nothing to  
0:10:53 25 point me in any other direction.

1 BY MS. McGOVERN:

0:10:58 2 Q. Mr. Lynam, do you have anything that would  
0:11:06 3 cause you to believe that Dr. Wright was working in a  
0:11:15 4 partnership or a joint venture with David Kleiman in  
0:11:24 5 connection with the Bitcoin block chain?

0:11:29 6 MR. BRENNER: Object to the form.

0:11:31 7 THE DEPONENT: No, I don't, and I have absolutely  
0:11:36 8 no knowledge of it and since Craig never mentioned  
0:11:41 9 Dave Kleiman and any such relationship to me, there was  
0:11:46 10 nothing to trigger me to think that that might be so. I  
0:11:51 11 could speculate in my mind and wonder why would it be so,  
0:11:55 12 but no, nothing was ever mentioned to me and I had no  
0:11:59 13 knowledge of any such thing.

0:12:02 14 THE VIDEOGRAPHER: This is the videographer. I  
0:12:04 15 have five minutes of tape.

0:12:06 16 MS. McGOVERN: I'm going to finish my questions in  
0:12:13 17 those five minutes.

0:12:15 18 BY MS. McGOVERN:

0:12:26 19 Q. Mr. Lynam, do you have any coins?

0:12:31 20 A. Do I have any coins?

0:12:33 21 Q. Yes.

0:12:34 22 A. No, none, none whatsoever. I bought two --

0:12:41 23 Q. And has Dr. - I apologize. Go ahead.

0:12:43 24 A. I bought two, I think, in 2010 because I just  
0:12:47 25 wanted to see how that worked. I was a bit scared of it

0:12:52 1 all, so I kept it to a purchase of less than \$5 and I got  
0:12:58 2 two Bitcoin for less than \$5, but I've completely -  
0:13:02 3 didn't pay much attention to it and I've completely lost  
0:13:06 4 the keys, so I've lost my \$5.

0:13:11 5 Q. And has Dr. Wright, or anybody else, provided  
0:13:16 6 you any compensation in connection with your testimony  
0:13:19 7 today?

0:13:21 8 A. None whatsoever, except a nice fuzzy - warm  
0:13:25 9 fuzzy feeling that I'm helping.

0:13:28 10 MS. McGOVERN: Thank you, Mr. Lynam. I have no  
0:13:29 11 further questions.

0:13:33 12 THE VIDEOGRAPHER: We'll go off the record.

0:13:34 13 MR. BRENNER: Before you go off the record - I know  
0:13:36 14 you had a couple of minutes - I just want to note that it  
0:13:39 15 appears that, probably because of the technical  
0:13:41 16 difficulties, some of the objections may not be getting  
0:13:44 17 through, and I know everyone is doing the best we can,  
0:13:46 18 I'm just noting that. I have no idea how many objections  
0:13:51 19 you've gotten, so - we'll deal with that later, but I  
0:13:53 20 just wanted to make that notation for the record.

0:13:56 21 Ms. McGovern, you're done with your questions?

0:13:58 22 MS. McGOVERN: Yes, I am.

0:14:00 23 MR. BRENNER: Okay. Let's take a five-minute break  
0:14:05 24 and then we'll do the cross-examination.

0:14:06 25 THE VIDEOGRAPHER: Going off the record - end of

0:14:07 1 tape 1. Going off the record at 10:13 a.m.

0:14:12 2 (10:13 a.m.)

3 (Break taken.)

0:20:17 4 (10:20 a.m.)

0:20:17 5 THE VIDEOGRAPHER: Going back on the record at  
0:20:21 6 10:20 a.m. Commencement of tape 2. Proceed.

0:20:27 7 **EXAMINATION BY MR. BRENNER:**

0:20:28 8 Q. Good morning again, sir. My name is Andrew  
0:20:30 9 Brenner and I represent the plaintiffs in this lawsuit.  
0:20:33 10 I'm going to try to follow up on a lot of the areas that  
0:20:37 11 Ms. McGovern covered with you earlier, okay?

0:20:39 12 A. Yes.

0:20:41 13 Q. Because I hear your name pronounced different  
0:20:44 14 ways at different names, can you just spell your last  
0:20:47 15 name for the record for me, please?

0:20:49 16 A. L-Y-N-A-M.

0:20:53 17 Q. Is the pronunciation Line-am?

0:20:56 18 A. Line-am, that's correct.

0:21:00 19 Q. One of the things you talked about with  
0:21:02 20 Ms. McGovern was whether you'd ever seen her before. Do  
0:21:06 21 you recall that?

0:21:06 22 A. Yes.

0:21:10 23 Q. I don't know if you heard, but when she  
0:21:14 24 introduced herself on the record, she said that she  
0:21:15 25 worked for a law firm in Miami, Florida called



0:21:20 1 Rivero Mestre. Did you hear that?

0:21:22 2 A. Yes.

0:21:22 3 Q. Before today, you have spoken with people from  
0:21:25 4 Rivero Mestre, haven't you, sir?

0:21:27 5 A. Yes.

0:21:29 6 Q. Who have you spoken to from Rivero Mestre?

0:21:33 7 A. Amanda and Zaharah Markoe.

0:21:38 8 Q. And do you recall - well, let's just do it one  
0:21:40 9 at a time. How many times, before today, have you spoken  
0:21:43 10 to - Amanda, you understand, is Ms. McGovern, right?

0:21:47 11 A. Yes, that's correct.

0:21:48 12 Q. I'll try to keep it more formal since it is a  
0:21:52 13 court setting. How many times, before today's  
0:21:55 14 deposition, did you speak with Ms. McGovern?

0:22:18 15 A. Not - three.

0:22:20 16 Q. I'm not sure what happened there. Let me ask  
0:22:22 17 the question again. How many times, before today's  
0:22:25 18 deposition, have you spoken with Ms. McGovern?

0:22:27 19 A. I apologize. At just verging on 80, my mental  
0:22:33 20 acuity is not as good as it used to be. I'm just trying  
0:22:36 21 to remember how many times. It is very few times.  
0:22:46 22 Between three and five. I don't think it's more than  
0:22:48 23 five. I think it's probably three.

0:22:52 24 Q. Very well, sir. Do you remember was she the  
0:22:55 25 first person from Rivero Mestre that you spoke to, from

0:22:59 1 that firm?

0:23:00 2 A. I think the first person I spoke to was  
0:23:03 3 Zaharah Markoe.

0:23:05 4 Q. How many times would you estimate that you  
0:23:07 5 spoke with Ms. Markoe?

0:23:10 6 A. Once, but I think she was in on another call  
0:23:16 7 where I was speaking to Ms. McGovern.

0:23:23 8 Q. Do you know when - and I know it is hard to  
0:23:27 9 pinpoint it - can you tell me the month when you first  
0:23:31 10 spoke with Ms. Markoe?

0:23:45 11 A. I don't remember.

0:23:48 12 Q. Do you remember the year, sir?

0:23:52 13 A. 2019.

0:23:54 14 Q. Do you know whether it was the first or second  
0:23:57 15 half of that year?

0:23:58 16 A. The second half.

0:24:01 17 Q. And in that first conversation with Ms. Markoe,  
0:24:04 18 was she alone or was Ms. McGovern part of that first  
0:24:10 19 conversation?

0:24:27 20 A. I do not remember.

0:24:29 21 Q. Okay. Do you know - did she call you or did  
0:24:34 22 you call her? What was the first form of communication?

0:24:37 23 A. She called me.

0:24:38 24 Q. When she called you, had you been told to  
0:24:41 25 expect her call?

0:24:45 1 A. I believe I got an email setting a time for the  
0:24:50 2 call.

0:24:51 3 Q. Who was that email from?

0:24:59 4 A. That first one was from Zaharah Markoe, I  
0:25:03 5 believe.

0:25:06 6 Q. I guess what I'm trying to ask you about is how  
0:25:10 7 - do you know how they came to get your phone number and  
0:25:14 8 know how to contact you?

0:25:20 9 A. I'm presuming that Craig gave it to them.

0:25:23 10 Q. Did you ever speak with Craig about that you  
0:25:26 11 were speaking to his attorneys?

0:25:32 12 A. He asked me whether I was willing to speak to  
0:25:34 13 them.

0:25:36 14 Q. So before Ms. Markoe called you or emailed you  
0:25:38 15 the first time, Dr. Wright had asked you whether you  
0:25:41 16 would be willing to speak with attorneys?

0:25:44 17 A. Yes.

0:25:45 18 Q. Did he tell you what he wanted you to speak  
0:25:51 19 with them about?

0:25:52 20 A. About the court case that he had in Florida.

0:25:57 21 Q. Did he tell you anything - what that court case  
0:25:59 22 was about?

0:25:59 23 A. He told me the superficial information, that  
0:26:05 24 Dave Kleiman was suing him for a certain amount of - not  
0:26:14 25 in any detail.

0:26:16 1 Q. Did he tell you that the case was about  
0:26:19 2 Bitcoin?

0:26:20 3 A. He did tell me that it was Bitcoin related,  
0:26:24 4 yes.

0:26:25 5 Q. So he - was this a telephone call or an email  
0:26:29 6 or an in-person contact from Dr. Wright?

0:26:32 7 A. In an email.

0:26:34 8 Q. Do you have that email still, sir?

0:26:38 9 A. I very possibly do, but I'm not certain, no. I  
0:26:45 10 routinely delete - rather than build up great reserves -  
0:26:50 11 I'm not in business or anything now, so my routine is to  
0:26:54 12 delete my emails as they come through.

0:27:02 13 Q. Although it will be an issue that we'll deal  
0:27:04 14 with through the court cases, I would ask you to preserve  
0:27:08 15 those emails - that email if you have not already deleted  
0:27:10 16 it, okay?

0:27:12 17 A. Certainly. I can do that.

0:27:13 18 Q. So in the contact from Dr. Wright, he told you  
0:27:15 19 - or asked you if you'd be willing to talk to his  
0:27:17 20 attorneys, is that fair to say?

0:27:18 21 A. That's correct.

0:27:19 22 Q. And then you got contacted by Ms. Markoe, is  
23 that correct?

0:27:22 24 A. True, yes.

0:27:23 25 Q. And as I understood what you said, she first

0:27:26 1 sent you an email to set up a time for a call?

0:27:30 2 A. Yes.

0:27:32 3 Q. Was there anything else in that email from  
0:27:34 4 Ms. Markoe?

0:27:42 5 A. I do not remember, but naturally, it would have  
0:27:46 6 said that there was a purpose to the telephone call, but  
0:27:53 7 that wasn't any comprehensive information, it would have  
0:27:56 8 been just an introduction to the topic and could we talk.

0:28:00 9 Q. And you understood the topic to be this  
0:28:03 10 lawsuit, correct?

0:28:03 11 A. Correct.

0:28:06 12 Q. You had your telephone call with Ms. Markoe.  
0:28:09 13 Can you tell me what you two spoke about the first time?

0:28:18 14 A. It was basically about what was my connection  
0:28:21 15 with Craig Wright and whether I had any connection with  
0:28:29 16 his work towards and launching Bitcoin.

0:28:35 17 Q. Is it fair to say that that conversation was  
0:28:39 18 about the same topics that you just discussed with  
0:28:43 19 Ms. McGovern at your deposition this last hour?

0:28:49 20 MS. McGOVERN: Object to form.

0:28:52 21 THE DEPONENT: No, that's not correct. It was very  
0:28:55 22 superficial and Ms. McGovern and Ms. Markoe have in fact  
0:29:13 23 - seemed to me to be quite determined not to talk in any  
0:29:18 24 depth about it whatsoever --

25 BY MR. BRENNER:

0:29:27 1 Q. So - I'm sorry, go ahead. I didn't mean to cut  
0:29:29 2 you off.

0:29:29 3 A. I did query a couple of times why I wasn't told  
0:29:33 4 more and had more explained to me, but then it occurred  
0:29:37 5 to me that it was probably prudent, for credibility, if  
0:29:43 6 there was no suggestion that I was fed any information  
0:29:48 7 that might prompt me in any direction, and that seemed to  
0:29:52 8 be the way it was. So I came in here fairly cold.

0:29:58 9 Q. Say that last part again, sir?

0:30:00 10 A. So I came in here today fairly cold.

0:30:03 11 Q. Okay. After the first conversation with  
0:30:05 12 Ms. Markoe, you estimated you had three to five  
0:30:10 13 conversations with Ms. McGovern, correct?

0:30:12 14 A. Yes.

0:30:14 15 Q. And in those three to five additional  
0:30:16 16 conversations, is it your testimony that they were all  
0:30:20 17 superficial? I'm just trying to understand what you all  
0:30:23 18 talked about.

0:30:30 19 A. I wish I'd gone back to my business days and  
0:30:32 20 kept notes - detailed notes on every call. The calls  
0:30:40 21 were really leading towards the deposition. Once it was  
0:30:45 22 established that - I said yes, there was a connection  
0:30:50 23 between Craig and myself that went over a number of years  
0:30:54 24 and that I was slightly involved but had definite  
0:31:01 25 knowledge of the launch of Bitcoin in 2009, we seemed to

0:31:09 1 step quickly to, "Are you willing to depose?" And after  
0:31:16 2 that, it was conversations primarily that led to today.

0:31:25 3 Q. So, for example, and you'll tell me if I'm  
0:31:28 4 wrong, when you came in today, one of the topics you knew  
0:31:31 5 you were going to talk about was the Bitcoin white paper,  
6 correct?

0:31:36 7 A. Correct.

0:31:37 8 Q. Another topic you knew you were going to talk  
0:31:39 9 about when you came in here today was Craig's  
0:31:42 10 relationship with - Dr. Wright's relationship with your  
0:31:45 11 father, correct?

0:31:46 12 A. Yes.

0:31:48 13 Q. One of the things you knew before you came here  
0:31:50 14 today and, by the way - let me backtrack. All these  
0:31:55 15 things you knew based on your conversations with Rivero  
0:31:59 16 Mestre, correct?

0:32:01 17 MS. McGOVERN: Object to the form of the question.  
0:32:03 18 Predicate.

0:32:03 19 BY MR. BRENNER:

0:32:06 20 Q. You can answer.

0:32:07 21 A. No.

0:32:08 22 Q. How did you know, before today, that you were  
0:32:10 23 going to talk about the Bitcoin white paper?

0:32:17 24 A. I surmised that I would.

0:32:20 25 Q. Just surmised it, never discussed the Bitcoin

0:32:25 1 white paper with the attorneys for Rivero Mestre, is that  
0:32:29 2 your testimony, sir?

0:32:29 3 MS. McGOVERN: Object to the form of the question.

0:32:31 4 BY MR. BRENNER:

0:32:32 5 Q. Is that your testimony, sir?

0:32:34 6 A. We are talking about telephone conversations?

0:32:38 7 Q. Well, were there emails also in addition to the  
0:32:40 8 telephone conversations?

0:32:42 9 A. I did send them a statement.

0:32:48 10 Q. You did?

0:32:49 11 A. Yes.

0:32:49 12 Q. You sent the attorneys for Rivero Mestre a  
0:32:52 13 written statement?

0:32:54 14 A. Yes - well, it was marked as a draft, but I  
0:32:57 15 sent that to them and it outlined much of what we spoke  
0:33:04 16 about today; that I was Craig's uncle and that he did  
0:33:09 17 have a relationship with me and his grandfather and that  
0:33:14 18 I was - I knew about his documents, he normally sent me  
0:33:20 19 his documents, and that I was involved in the launch of  
0:33:25 20 Bitcoin in the beginning of 2009. So it was a short  
0:33:30 21 statement to the effect that this was the case. They did  
0:33:39 22 not ask me for the statement, though. In order to get  
0:33:45 23 quickly to the nub of it, I decided that I would send  
0:33:50 24 them a statement and then that would avoid a whole lot of  
0:33:55 25 enquiry as to how I was involved and what I knew, and



0:34:01 1 that, I assume, is why there were no further discussions,  
0:34:06 2 I had made a statement.

0:34:08 3 Q. Once you sent the statement to - did you send  
0:34:11 4 it to Rivero Mestre, is that who you sent it to?

0:34:15 5 A. Yes.

0:34:16 6 Q. And you said you sent it. Was it stamped or  
0:34:17 7 marked a draft, is that what you said?

0:34:19 8 A. It was.

0:34:20 9 Q. Did you ever sign that statement?

0:34:21 10 A. No.

0:34:22 11 Q. Once - is it your testimony that once you sent  
0:34:25 12 that statement to Rivero Mestre, you had no further  
0:34:28 13 conversations with them about the substance of the topics  
0:34:32 14 you've talked about today?

0:34:36 15 A. I hate the word of "absolute", had no - because  
0:34:42 16 there can be the slightest mention that can be  
0:34:46 17 misconstrued as saying there was some conversation of any  
0:34:51 18 substance or merit. From any reasonable point of view,  
0:34:57 19 the answer would be no.

0:35:02 20 Q. I think we got crossed up on a double negative  
0:35:06 21 there, so let me try to re-ask it. Is your testimony,  
0:35:09 22 and I understand you can't be absolute, but it is your  
0:35:11 23 testimony that once you sent the statement to Rivero  
0:35:15 24 Mestre, you essentially did not have any more substantive  
0:35:19 25 discussions with them about your testimony, is that fair?

0:35:23 1 A. Yes.

0:35:24 2 Q. Do you know when you sent that statement?

0:35:29 3 A. I don't remember.

0:35:38 4 Q. Do you remember the year?

0:35:45 5 A. I believe it was this year.

0:35:49 6 Q. "This year" being 2020?

0:35:54 7 A. Yes.

0:35:55 8 Q. And did you send that by email?

0:35:56 9 A. Yes, as an email attachment.

0:36:01 10 Q. Did you type a document and attach it to an  
0:36:03 11 email?

0:36:04 12 A. Yes. It was in PDF format and I attached it to  
0:36:08 13 an email.

0:36:14 14 Q. And do you still have a copy of that?

0:36:16 15 A. Yes.

0:36:17 16 Q. Do you have it with you?

0:36:19 17 A. No.

0:36:20 18 Q. Okay. Let me ask you you talked a lot about  
0:36:26 19 the gentleman who was referred both to as Dr. Wright's  
0:36:30 20 grandfather and your father, so let me ask you a few  
0:36:33 21 questions about him, okay?

0:36:35 22 A. Yes.

0:36:35 23 Q. What was his name?

0:36:37 24 A. Ronald Andrew Lynam.

0:36:42 25 Q. I don't know that we asked you this. What is

0:36:44 1 your date of birth?

0:36:45 2 A. [REDACTED]

0:36:49 3 Q. 40?

0:36:50 4 A. 40.

0:36:52 5 Q. And your father - and I apologize, you said his

0:36:55 6 name. His name was what again?

0:36:57 7 A. Ronald Andrew Lynam.

0:37:00 8 Q. And Ronald Lynam, because otherwise we'll have

0:37:06 9 many Mr. Lynams, Ronald Lynam, when was he born?

0:37:11 10 A. 1916.

0:37:14 11 Q. He's passed away or is he still alive?

0:37:17 12 A. No, he passed away at 92.

0:37:21 13 Q. He passed away in 1992. Do you know how old

0:37:24 14 Dr. Wright is?

0:37:37 15 A. 49, I think. I know when he was born. He was

0:37:41 16 born in October 1970, three months before my son, so I

0:37:49 17 remember that and I can't remember my son's name either.

0:37:52 18 I'd have to do quick math - not his name, his age.

0:37:58 19 Q. You already got where we needed to be. So

0:38:00 20 Dr. Wright was born in 1970, correct?

0:38:03 21 A. Correct.

0:38:04 22 Q. And your father, do you recall his date of

0:38:11 23 death, what month he passed away?

0:38:14 24 A. No, I do not.

0:38:16 25 Q. Okay. Because we don't know the month, your

0:38:22 1 father passed away when Dr. Wright was either 21 or 22  
0:38:27 2 years old, right?

0:38:28 3 A. Yes, that would be right.

0:38:29 4 Q. So most of your father's life, Dr. Wright was a  
0:38:34 5 minor, correct?

0:38:35 6 A. Correct.

0:38:38 7 Q. They were not business associates in any way,  
8 correct?

0:38:40 9 A. Absolutely not.

0:38:42 10 Q. But he loved your father, right?

0:38:44 11 A. He certainly did.

0:38:46 12 Q. And your father loved him, correct?

0:38:47 13 A. Correct.

0:38:53 14 Q. When your father - let's start from, let's say,  
0:38:58 15 1988, when Dr. Wright would have been about 18, okay?  
0:39:03 16 Where was your father living?

0:39:25 17 A. At that stage he could have gone into the  
0:39:31 18 Pimpama Nursing Home, outside Brisbane.

0:39:33 19 Q. I was going to ask you that. At the end - in  
0:39:35 20 the latter years of his life, was your father in a  
0:39:38 21 healthcare facility?

0:39:39 22 A. Yes, he was.

0:39:41 23 Q. About how many of the last years of his life  
0:39:43 24 was he in a - I think you said it was a nursing home.  
0:39:47 25 How long was he in there?

0:39:50 1 A. I cannot remember precisely. It was a few  
0:39:53 2 years, though.

0:39:55 3 Q. Do you know what - I think you may have said  
0:39:58 4 it, or maybe you were saying the name of the nursing  
0:40:00 5 home. Do you know what city that was in, or town? I'm  
0:40:04 6 not sure what verbiage you use.

0:40:05 7 A. Pimpama the name of the district is.

8 Q. Okay.

9 A. It's --

0:40:09 10 Q. So where was Dr. - I'm sorry.

0:40:11 11 A. It's near the Gold Coast - or it is in the  
0:40:15 12 Gold Coast city in Queensland.

0:40:18 13 Q. Where did Dr. Wright live at this time?

0:40:31 14 A. At that time he lived in northern New South  
0:40:37 15 Wales, I believe, and - I'm trying to remember the town  
0:40:53 16 it was outside, but it was in northern New South Wales,  
0:40:57 17 where he set up a berry farm with his wife. It's very  
0:41:04 18 hard for me to get the years right, but after he left the  
0:41:11 19 accounting firm - I think it was BDO - they set up a farm  
0:41:20 20 with berries, I think, so he was actually living there,  
0:41:26 21 but clearly he was doing a lot of travelling. That was  
0:41:31 22 basically his home base.

0:41:33 23 Q. Right. Maybe our years are a little off. I'm  
0:41:36 24 trying to focus on really the ages between 18 and 22,  
0:41:40 25 which is when Dr. Wright - when Dr. Wright was between 18

0:41:45 1 and 22 was the last three to four years of your dad's  
0:41:49 2 life?

0:41:50 3 A. Yes.

0:41:50 4 MS. McGOVERN: I'm sorry, can you repeat that  
0:41:51 5 question, Mr. Brenner? I didn't hear it.

0:41:53 6 MR. BRENNER: Sure.

0:41:53 7 BY MR. BRENNER:

0:41:53 8 Q. I'm trying to set the timeframe. I'm trying to  
0:41:57 9 focus you on the time period when Dr. Wright is about 18  
0:42:00 10 to 22, which should be the last four years of your dad's  
0:42:03 11 life. Do you understand that?

0:42:04 12 A. I do.

0:42:05 13 Q. So I'm trying to figure out where Dr. Wright  
0:42:09 14 was living during those years?

0:42:21 15 A. To make an honest statement, I would have to  
0:42:23 16 say I don't know and through most of his life - adult  
0:42:34 17 life, I didn't know where he lived anyway because the way  
0:42:39 18 it worked, we communicated by email and telephone and  
0:42:45 19 didn't discuss where he was living and we got together  
0:42:54 20 most Christmases and I also went to his two weddings and  
0:43:03 21 sisters' weddings, where I'd meet up with him again, but  
0:43:08 22 as for actually getting together, it was primarily on  
0:43:14 23 family occasions, because I lived in Melbourne, or  
0:43:21 24 outside Melbourne, and - at that time I did live in  
0:43:26 25 Melbourne.

0:43:30 1 Q. In that time - again, this is when Dr. Wright  
0:43:33 2 is in his early adult years, 18 to 22 - how often was he  
0:43:37 3 seeing your father?

0:43:42 4 A. I can't say that because when I saw the two of  
0:43:47 5 them together, and the warmth between them, was times  
0:43:52 6 when I was up there, but at those - at that age, I'm sure  
0:44:06 7 he lived locally to the major Brisbane area, I feel sure,  
0:44:12 8 but I don't know for certain, I truly don't know.

0:44:15 9 Q. I'm geographically challenged when it comes to  
0:44:17 10 Australia, so what is the geographic relationship between  
0:44:21 11 the greater Brisbane area and where your father was in  
0:44:24 12 the nursing home?

0:44:29 13 A. It and the Gold Coast actually merge together,  
0:44:32 14 they are part of the - ostensibly, part of the one  
0:44:37 15 metropolitan area, the Gold Coast, but Pimpama, which I  
0:44:42 16 think the place was called, was closer into Brisbane and  
0:44:49 17 definitely on the side of Brisbane, where my parents  
0:44:52 18 lived.

0:44:55 19 Q. You don't have personal knowledge of how often  
0:44:58 20 Dr. Wright was seeing your grandfather the last three or  
0:45:02 21 four years of his life, is that fair?

0:45:03 22 A. No, I don't have personal knowledge. My  
0:45:06 23 knowledge is merely of what my mother says to me, that  
0:45:11 24 they get there and they talk for hours, with some  
0:45:19 25 complaint of it, and what I have seen when I have been

0:45:23 1 visiting in that area.

0:45:35 2 Q. You would be with Dr. Wright and your father at  
0:45:40 3 Christmas time, is that correct?

0:45:41 4 A. Yes.

0:45:42 5 Q. Any other times that you have personal  
0:45:48 6 knowledge that you witnessed them together in the last  
0:45:50 7 few years of your father's life?

0:45:52 8 A. There were other occasions when we went up  
0:45:56 9 there, when there were special events, so - I certainly  
0:46:01 10 don't have a calendar which would tell me when we made  
0:46:05 11 all these trips, so no, I can't tell you how many times.

0:46:18 12 Q. Can you estimate it, how many times per year in  
0:46:23 13 those three to four years that Dr. Wright would see your  
0:46:25 14 father, based on your personal knowledge?

0:46:29 15 MS. McGOVERN: Object to the form of the question.

0:46:33 16 THE DEPONENT: It would be several times.

0:46:48 17 BY MR. BRENNER:

0:46:51 18 Q. Several times a year?

0:46:56 19 A. Because - yes, because at the times when the  
0:46:59 20 family was together, Craig was a frequent visitor to my  
0:47:03 21 grandparents' home.

0:47:05 22 Q. Okay. What does Craig call you?

0:47:10 23 A. He now calls me Don.

24 Q. Okay.

0:47:15 25 A. But --



0:47:15 1 Q. Was there a time - I'm sorry. I didn't mean to  
0:47:18 2 cut you off.

0:47:18 3 A. But he called me Uncle Don, and his sisters did  
0:47:23 4 too. I don't know. I think their mother must have  
0:47:29 5 brought them up very well, but they always called me  
0:47:32 6 Uncle Don and Craig - well, it wouldn't have been more  
0:47:38 7 than five years ago that he stopped calling me Uncle Don.

0:47:42 8 Q. Okay. You love Craig, don't you?

0:47:45 9 A. I do. I have great respect and sympathy for  
0:47:48 10 Craig.

0:47:49 11 Q. Why do you have sympathy for him?

0:47:52 12 A. Because of his difficulties. He has an  
0:48:01 13 admitted problem - I feel I can mention it because he has  
0:48:05 14 mentioned it on stage and his mother has mentioned it to  
0:48:11 15 me, but he has actually mentioned it in public, on stage,  
0:48:18 16 basically apologizing for the way he gets angry - but he  
0:48:21 17 has Asperger's and part of the way he has Asperger's is  
0:48:28 18 that, one, his brain just works like a machine and, two,  
0:48:33 19 he tends to be socially inept, except for when he's with  
0:48:39 20 my grand - with my father - well, when he - they just  
0:48:45 21 went boom.

0:48:48 22 Q. So you have sympathy for him for the reasons  
0:48:52 23 you describe and you respect him - I think you've talked  
0:48:57 24 about that already - but you also love him as your  
0:49:02 25 nephew, correct?

0:49:02 1 A. I do, and I respect him for being a very  
0:49:05 2 honorable and honest person. As I said in response to  
0:49:11 3 Ms. McGovern, I wasn't all that surprised that he picked  
0:49:17 4 out a Japanese philosopher of the ilk of Adam Smith  
0:49:25 5 because of his thrust towards the economy works best with  
0:49:29 6 incentive and reward. It is part of Craig being honest  
0:49:37 7 and believing in right and good morals and in proper  
0:49:45 8 behavior.

0:49:48 9 Q. One of the last questions Ms. McGovern asked  
0:49:51 10 you was, and I'm not professing to quote it, but she  
0:49:54 11 essentially asked you whether you had been given any  
0:49:58 12 compensation for your testimony today. Do you recall  
0:50:00 13 that?

0:50:00 14 A. Yes.

0:50:02 15 Q. And your answer - again, I'm not professing to  
0:50:04 16 quote it, but I'm doing my best to capture what you said  
0:50:08 17 - you said you have not been given any compensation,  
0:50:11 18 other than you get - I think you said a warm fuzzy  
0:50:15 19 feeling because you're helping. Is that what you said?

0:50:20 20 A. Yes.

0:50:20 21 Q. What did you mean by that?

0:50:24 22 A. Well, it was an interesting thing to do, to get  
0:50:29 23 involved, even though it was very superficially involved.  
0:50:34 24 It kept me interested in my computer and playing with it  
0:50:37 25 further, to add to it and make it a more robust and

0:50:43 1 strong-running machine, so I enjoyed all of that, but I  
0:50:50 2 never did mine for Bitcoin and I have no knowledge of how  
0:50:59 3 you mine, what the process is, but I've installed what's  
0:51:06 4 called a node and what the node does, I know that it  
0:51:15 5 verifies transactions and competes with other computers  
0:51:21 6 to be the one that verifies a transaction and I know that  
0:51:29 7 miners, that they - when they do whatever they do, they  
0:51:32 8 can earn Bitcoin and that's the incentive part, part of  
0:51:37 9 the incentive part, but mine was set up as totally  
0:51:46 10 hands-off for me, except that I kept the monitor going so  
0:51:50 11 I could watch the task manager to see that the system was  
0:51:54 12 running correctly.

0:51:55 13 Q. Mr. Lynam, let me try this again. You were  
0:51:59 14 asked two questions at the end of Ms. McGovern's  
0:52:02 15 examination. One was about whether you had been  
0:52:04 16 compensated for running Bitcoin. I'm not asking you  
0:52:08 17 about that. She then specifically asked you if you were  
0:52:11 18 being compensated for what you're doing today, testifying  
0:52:15 19 today, and you said, "No, except for I get a warm, fuzzy  
0:52:19 20 feeling because I know I'm helping." Do you recall that?

0:52:24 21 A. Well, no, I don't recall that. Obviously the  
0:52:29 22 conversation got a little confused. I didn't hear her  
0:52:33 23 ask whether I was being compensated for today, but the  
0:52:41 24 answer to that, if she did ask that, is no, there's no  
0:52:46 25 compensation for today, and I'm trusting there's no

0:52:49 1 expense as well, but --

0:52:54 2 Q. Not from me.

0:52:56 3 A. But with running the node, which I thought was  
0:52:59 4 the question, no, no compensation for that.

0:53:04 5 Q. Sir, you want to help your nephew through your  
0:53:08 6 testimony today, that's fair to say, is it not?

0:53:13 7 MS. McGOVERN: Object to the form of the question.

0:53:18 8 THE DEPONENT: Yes. If I didn't think that  
0:53:21 9 absolutely honest answers would be of assistance to  
0:53:31 10 Craig, I probably would have said that I don't want to  
0:53:36 11 depose and I understand there was no real compulsion  
0:53:42 12 until I got that subpoena, so there wasn't compulsion. I  
0:53:48 13 agreed to do it because I have so much faith in Craig and  
0:53:54 14 my knowledge of what happened through that time that I  
0:54:01 15 have high confidence that Craig has behaved correctly and  
0:54:10 16 my understanding of it is correct and I can answer all  
0:54:14 17 the questions with absolute honesty.

18 BY MR. BRENNER:

0:54:18 19 Q. I'm not suggesting anything, I'm just - is it  
0:54:22 20 fair to say that you, and I think you did say, you agreed  
0:54:25 21 to be - "deposed" is the word you used - because you  
0:54:29 22 believed that your testimony, truthful testimony, would  
0:54:32 23 help your nephew, correct?

0:54:39 24 MS. McGOVERN: Object to the form of the question.

0:54:41 25 THE DEPONENT: Now, I'm not a lawyer. It may be

0:54:44 1 possible that my testimony is no assistance at all, but I  
0:54:48 2 certainly, in my heart, do hope that I am of some  
0:54:54 3 assistance to him and to the honest and proper outcome of  
0:54:58 4 the matter.

0:55:00 5 BY MR. BRENNER:

0:55:03 6 Q. I want to talk to you a little bit about the  
0:55:07 7 Bitcoin white paper.

0:55:09 8 A. Yes.

0:55:13 9 Q. Now, here I did try to take pretty good notes,  
0:55:15 10 so I'm going to go through what I think you testified to  
0:55:18 11 and you'll tell me where I got it wrong, okay?

0:55:21 12 A. Okay.

0:55:21 13 Q. Some time, I believe you said, in 2007 or 2008  
0:55:27 14 you got from Dr. Wright a draft of what later became the  
0:55:32 15 Bitcoin white paper, correct?

0:55:34 16 A. Correct.

0:55:35 17 Q. I think you testified that when you got that  
0:55:38 18 draft, it didn't say the word "Bitcoin" on it, correct?

0:55:45 19 A. Correct. Certainly I cannot recall the word  
0:55:49 20 "Bitcoin". I think there was postulated, and I'm trying  
0:55:55 21 to think if it was actually on that document, alternate  
0:55:59 22 names, but the substance of it was of that paper.

0:56:05 23 Q. Okay. And what you said was that it was highly  
0:56:10 24 technical, correct?

0:56:11 25 A. Yes. There were lots of mathematics and graphs

0:56:17 1 and tables.

0:56:21 2 Q. Although - I'm sorry. Let me give you a  
0:56:23 3 blanket apology. It's hard for me to know always when  
0:56:26 4 you're done, so when I do cut you off, which I have done  
0:56:30 5 several times inadvertently, and Ms. McGovern did as  
0:56:33 6 well, you just let me know, okay? It is nothing  
0:56:35 7 intentional, okay?

0:56:38 8 A. Certainly, and I apologize in turn because I  
0:56:44 9 acknowledge that my brain doesn't click over just as  
0:56:48 10 quickly as it used to - I used to be pretty damn good -  
0:56:55 11 but I want to go slowly and I want to try to be  
0:56:58 12 absolutely certain that when I - what I say is the best  
0:57:04 13 rendition of what my brain tells me.

0:57:08 14 Q. Okay. To try to help us, I'm going to try to  
0:57:11 15 ask short questions, okay?

0:57:13 16 A. Okay.

0:57:14 17 Q. When you received the draft paper from  
0:57:17 18 Dr. Wright, you described it today as being highly  
0:57:22 19 technical, right?

0:57:23 20 A. Yes.

0:57:24 21 Q. And although you had helped Dr. Wright edit  
0:57:28 22 some of his other papers, this one you told him you  
0:57:31 23 couldn't help him with because it was highly technical?

0:57:34 24 MS. MCGOVERN: Object to the form of the question.

0:57:37 25 BY MR. BRENNER:

0:57:37 1 Q. That's what you said, right, sir?

0:57:39 2 A. No, that's not what I intended to say, if  
0:57:42 3 that's what I did say. What --

0:57:43 4 Q. Okay. What did you intend to say?

0:57:45 5 A. What I said was that I decided I did not  
0:57:51 6 attempt. I didn't tell him I wouldn't because of, I just  
0:57:55 7 simply decided I wouldn't attempt to do it.

0:57:59 8 Q. Okay. Fair enough. So you did not attempt to  
0:58:01 9 edit that paper, correct?

0:58:02 10 A. Correct.

0:58:05 11 Q. You described it, in the form you got it, as  
0:58:08 12 being, and I quote - I think I'm quoting this, you  
0:58:12 13 described it as being "poorly written", is that fair?

0:58:15 14 A. Yes.

0:58:18 15 Q. Have you since seen the final version of that  
0:58:20 16 paper?

0:58:21 17 A. Yes.

0:58:24 18 Q. It's been edited since you saw it, the draft,  
19 correct?

0:58:29 20 A. Thank God.

0:58:30 21 MS. McGOVERN: Object to the form of the question.

0:58:31 22 BY MR. BRENNER:

0:58:35 23 Q. You can answer.

0:58:35 24 A. Thankfully, yes.

0:58:37 25 Q. It's a lot better written, correct?

0:58:40 1 A. It's a lot better written.

0:58:42 2 Q. If someone said that you edited that paper,  
0:58:45 3 that would be incorrect?

0:58:45 4 A. That would be incorrect.

0:58:48 5 Q. If someone said that you helped set up Bitcoin,  
0:58:52 6 that would also be incorrect?

0:58:54 7 A. Yes. I just want to make sure I understand --

0:59:07 8 Q. Sure --

0:59:08 9 A. -- your question there.

0:59:10 10 Q. Sure.

0:59:13 11 A. As I explained, there were a lot of people, and  
0:59:16 12 an expanding number of people, that were involved in  
0:59:19 13 Bitcoin, and that's the whole nature of Bitcoin, and I  
0:59:25 14 was one of those people, I ran a node, but did I have any  
0:59:30 15 technical input into establishing it or operating it?  
0:59:36 16 The answer is no.

0:59:38 17 Q. Other than after Bitcoin, as you said, went  
0:59:41 18 live and you helped run a node, did you help set up  
0:59:44 19 Bitcoin?

0:59:45 20 A. No. I ran the node and that was it.

0:59:53 21 Q. That was it. Okay.

0:59:53 22 A. In fact, I didn't even really read much about  
0:59:57 23 it after that.

1:00:00 24 Q. You said that - I'm not sure exactly what you  
1:00:06 25 said. Do you recall how - in what format Craig - excuse



1:00:11 1 me - Dr. Wright sent you the draft Bitcoin paper?

1:00:23 2 A. Well, I printed it, I had it on paper. I'm  
1:00:27 3 assuming it was a PDF, but I can't recall whether he sent  
1:00:31 4 it as an attachment to an email or whether he gave me a  
1:00:37 5 URL to go and get it off the internet, I can't remember.

1:00:43 6 Q. So he either sent you, by email, an attachment  
1:00:46 7 or, in an email, a link to go find the PDF, is that fair?

1:00:50 8 A. That's fair, but I - to be honest, I cannot  
1:00:54 9 remember precisely. He would not have used FTP just to  
1:01:04 10 send that, so I would think that it was either by email  
1:01:09 11 or he sent me - as an attachment - it would have been an  
1:01:15 12 attachment because it was a document, or I got it off a  
1:01:19 13 URL that he gave me, but probability tells me it would be  
1:01:25 14 an email with an attachment.

1:01:28 15 Q. And do you still have that email?

1:01:31 16 A. No.

1:01:47 17 Q. Now, you were asked questions about whether  
1:01:51 18 you'd ever heard of Dave Kleiman. Do you recall that  
1:01:54 19 testimony?

1:01:55 20 A. Yes.

1:01:56 21 Q. Now, you were very clear that Craig Wright, or  
1:02:01 22 Dr. Wright, never referred to or told you about anyone  
1:02:05 23 named Dave Kleiman, correct?

1:02:06 24 A. Yes.

1:02:08 25 Q. But you said you did some of your own research

1:02:12 1 and you found certain books where Dave Kleiman and  
1:02:18 2 Dr. Wright were either co-authors or one was a  
1:02:21 3 contributor to the other's work, correct?

1:02:23 4 A. Yes.

1:02:24 5 Q. When did you do that research?

1:02:30 6 A. Within the last two months.

1:02:32 7 Q. Was it in connection with your preparation for  
1:02:35 8 your testimony today?

1:02:38 9 A. Yes.

1:02:39 10 Q. So you wanted - and I think you said this - you  
1:02:42 11 wanted to make sure that you knew as much as you could  
1:02:46 12 about the subjects you were going to be asked about?

1:02:49 13 MS. McGOVERN: Object to the form of the question.

14 BY MR. BRENNER:

1:02:53 15 Q. Go ahead.

1:02:54 16 A. Yes, I think that is trying to put words in my  
1:02:57 17 mouth. I was not trying to get facts to relate, I was  
1:03:03 18 trying to refresh my mind and try to understand what this  
1:03:08 19 is all about. I mentioned to you that Craig had sent me  
1:03:16 20 images of his qualifications, his business cards. He  
1:03:26 21 had, I recall, sent me images of the covers, not the  
1:03:31 22 actual books themselves, of the covers of some books that  
1:03:36 23 he had written or co-written. Now, in doing a little bit  
1:03:43 24 of reading to find out what this is all about - I had  
1:03:49 25 never heard of Dave Kleiman until this arose. Now, the

1:03:56 1 name Dave Kleiman is not in my memory bank anywhere, so I  
1:04:02 2 decided to have a look and to go back and try to find  
1:04:10 3 those books, so I searched in images in Google and I  
1:04:15 4 searched "Kleiman and Wright" and I came up with images  
1:04:22 5 of some of the books and I said, "Bang, that's what Craig  
1:04:27 6 sent me, those images," and so now I know that Dave  
1:04:34 7 Kleiman is there and did have some relationship. But did  
1:04:41 8 Craig ever talk to me about it? No.

1:04:46 9 Q. I misunderstood what you said before, so let me  
1:04:48 10 just follow up. When Craig had sent you - or Dr. Wright  
1:04:51 11 had sent you these images of cards and book covers, was  
1:04:56 12 that recently or was that some time way in the past?

1:04:59 13 A. That was in 2007, I think.

1:05:04 14 Q. That had nothing to do with your testimony here  
1:05:06 15 today?

1:05:07 16 A. Absolutely none whatsoever, but I just wanted  
1:05:10 17 to make it clear, in the interest of full openness and  
1:05:15 18 honesty, that I can say that I knew nothing whatever,  
1:05:19 19 until recently, of Dave Kleiman, but I'd have to admit  
1:05:26 20 that Craig sent me information and documents and, lo and  
1:05:31 21 behold, there's Dave Kleiman's name. So it was clear to  
1:05:36 22 me that Craig had a relationship in writing those books,  
1:05:43 23 for an entirely different purpose, but all of that -  
1:05:49 24 Dave Kleiman was not familiar to me at any time until  
1:05:53 25 this matter.

1:05:55 1 Q. Right. So in the last couple months you did  
1:05:58 2 some - I think you said Google searches, right?

1:06:01 3 A. Yes.

1:06:02 4 Q. And when you saw some of the books pop up, it  
1:06:04 5 rang a bell that the images were something that Craig had  
1:06:07 6 sent you 10, 12 years ago?

1:06:09 7 A. I recognized the images, I said, "Ah, those are  
1:06:17 8 the books," because I picked those images out of a great  
1:06:21 9 sheet of Google images, and with blowing them up, I could  
1:06:24 10 see Dave Kleiman's name there as an author or co-author.

1:06:30 11 Q. When you did that, which I think you said was  
1:06:33 12 in the last couple months --

1:06:36 13 A. Yes.

1:06:37 14 Q. -- did you call Craig and ask him about  
1:06:39 15 Dave Kleiman?

1:06:39 16 A. No.

1:06:40 17 Q. Why not?

1:06:42 18 MS. McGOVERN: Object to the form of the question.

1:06:46 19 THE DEPONENT: I'm not sure what I would ask him.

1:06:48 20 What would I ask?

21 BY MR. BRENNER:

1:06:51 22 Q. You weren't curious about who this person was  
1:06:56 23 that - whose family was involved with a lawsuit against  
1:07:01 24 your nephew and now you had discovered that they had  
1:07:05 25 worked on publications together?

1:07:08 1 MS. McGOVERN: Object to the form of the question.

2 THE DEPONENT: No.

1:07:09 3 MS. McGOVERN: Asked and answered.

1:07:14 4 BY MR. BRENNER:

1:07:14 5 Q. You can answer, sir.

1:07:16 6 A. Way back in 2007, clearly I did know that Craig

1:07:20 7 worked with Dave Kleiman, and others, in producing

1:07:26 8 cryptographic and security manuals and books for the

1:07:38 9 purpose of selling them, I would presume, to

1:07:42 10 organizations like the New South Wales police force, the

1:07:46 11 military forces and so on, but it had nothing to do with

1:07:54 12 Bitcoin, it was well before all of that, I believe, and

1:08:03 13 Craig did not specifically talk to me about any of his

1:08:08 14 co-authors, they were just co-authors, so I had no

1:08:13 15 particular interest in Dave Kleiman, except I went back

1:08:16 16 to look at those books, because in something else I read

1:08:23 17 on the internet, there was - and trying to see what this

1:08:28 18 case was about, there was some mention of them having

1:08:37 19 collaborated with books and so I said, "Ah, is that who -

1:08:45 20 is he one of the co-authors?", and it turns out that I

1:08:50 21 verified that he was one of the co-authors - well,

1:08:53 22 obviously was, you can see it on the book - of the

1:08:58 23 document that Craig had sent me. But Craig - let me

1:09:04 24 repeat again Craig did not discuss, in any way that I can

1:09:08 25 recall, Dave Kleiman in that period or in writing those

1:09:19 1 books, nor in anything up to and during the Bitcoin  
1:09:29 2 thing, he absolutely did not. There's - there are names,  
1:09:39 3 like Hal Finney and Hal Finney came up because we  
1:09:44 4 discussed the repair - the discovery of a fault and a  
1:09:50 5 repair of the original node software and this fellow,  
1:09:55 6 Hal Finney, as I understand it, installed it, found the  
1:10:01 7 problem and then he contacted who he knew as Satoshi  
1:10:07 8 Nakamoto, said there was a fault, could he contribute and  
1:10:11 9 did and ended up making quite a few code contributions;  
1:10:17 10 Craig had told me that. But getting to the point of  
1:10:29 11 Dave Kleiberg - Kleiman, I should say, did he ever  
1:10:33 12 mention Dave Kleiman as - well, no, he - I simply didn't  
1:10:43 13 know about Dave Kleiman, except for those books way back  
1:10:47 14 in 2007, and even then, the name didn't register in my  
1:10:53 15 mind as a name to remember. So the name was discovered  
1:10:59 16 by me, in any sort of reasonable form, only in these last  
1:11:05 17 few months.

1:11:27 18 Q. You testified that it was commonsense to you  
1:11:31 19 that Dr. Wright would have had help in creating Bitcoin,  
20 is that correct?

1:11:36 21 A. That's correct, yes.

1:11:37 22 MS. McGOVERN: Object to the form of the question.

1:11:40 23 BY MR. BRENNER:

1:11:41 24 Q. And you don't know - he never mentioned any of  
1:11:46 25 who those people were, except for perhaps Hal Finney, is

1 that correct?

1:11:50 2 A. That's correct, but he has mentioned one other,  
1:11:53 3 whose name I have never known.

1:11:56 4 Q. He mentioned there's another person but he  
1:11:59 5 didn't tell you the name?

1:12:00 6 A. Yes, and all he told me was a security person  
1:12:09 7 who - his relationship with him, he's a super  
1:12:16 8 mathematician, but his name cannot be revealed.

1:12:20 9 Q. You don't know it?

1:12:22 10 A. I don't know it, I don't know it.

1:12:26 11 Q. Do you know an individual by the name of  
1:12:28 12 Gareth Williams?

1:12:30 13 A. I don't know him, no.

1:12:31 14 Q. Do you know someone that goes by the name of  
1:12:35 15 Pershing Cat?

1:12:36 16 A. Who?

1:12:37 17 Q. Pershing Cat, like General Pershing and then  
1:12:42 18 cat, the animal?

1:12:44 19 A. Not a Persian cat? No. Is that somebody's  
1:12:50 20 name?

1:12:51 21 Q. You don't know anyone that goes by that  
1:12:54 22 moniker, correct?

1:12:55 23 A. No.

1:12:55 24 Q. What about an individual by the name of  
1:12:57 25 David Reese, R-E-E-S-E?

1:13:00 1

A. No.

1:13:04 2

Q. Other than the two Bitcoin that you said that

1:13:06 3

you purchased - I think you said for under \$5 - did you

1:13:10 4

ever have any ownership interest in any Bitcoin?

1:13:14 5

A. No.

1:13:14 6

Q. Did you have any ownership interest in any

1:13:17 7

company that Craig Wright or Dr. Wright was associated

1:13:19 8

with?

1:13:20 9

A. No.

1:13:21 10

Q. Did you have any ownership interest in any

1:13:25 11

intellectual property developed in whole or in part by

1:13:30 12

Dr. Craig Wright?

1:13:31 13

A. No. These are good, easy questions and I can

1:13:37 14

answer with certainty.

1:13:53 15

MR. BRENNER: I'm almost done, sir. Let's take a

1:14:12 16

five-minute break.

1:14:13 17

THE VIDEOGRAPHER: Going off the record at

1:14:16 18

10:14 a.m. [sic]

1:14:18 19

(11:14 a.m.)

20

(Break taken.)

1:21:11 21

(11:21 a.m.)

1:21:11 22

THE VIDEOGRAPHER: Going back on the record at

1:21:14 23

10:21 a.m. - 11:21 a.m. Proceed.

1:21:17 24

BY MR. BRENNER:

1:21:20 25

Q. Mr. Lynam, I'm going to just ask you a few more



1:21:23 1 questions and then we'll be done, okay?

1:21:25 2 A. Okay.

1:21:25 3 Q. Have you ever heard of a company called  
1:21:29 4 W&K Information Defense Research?

1:21:30 5 A. No.

1:21:32 6 Q. Have you ever heard of any company that has the  
1:21:34 7 name W&K in it - bad question. Let me try it again.

1:21:43 8 Have you ever heard of a company called W&K Information  
1:21:47 9 Defense?

1:21:47 10 A. No.

1:21:48 11 Q. Have you ever been employed by any company that  
1:21:51 12 goes by the name W&K Information Defense or Information  
1:21:57 13 Defense Research?

1:21:58 14 A. No.

1:21:58 15 Q. Have you got any ownership interest in any  
1:22:01 16 company that goes by those names?

1:22:03 17 A. No.

1:22:03 18 Q. Have you ever been a director of any company  
1:22:05 19 that goes by those names?

1:22:07 20 A. No.

1:22:08 21 Q. Have you ever been a director of a company  
1:22:10 22 called Wright International Investments?

1:22:13 23 A. No.

1:22:13 24 Q. Have you ever been employed by a company called  
1:22:16 25 Wright International Investments?

1:22:17 1

A. No.

1:22:18 2

Q. Have you ever had any ownership interest in a

1:22:20 3

company called Wright International Investments?

1:22:23 4

A. No.

1:22:24 5

Q. Have you ever heard of a company called

1:22:26 6

Information Defense Pty Ltd?

1:22:30 7

A. No.

1:22:30 8

Q. Have you ever had any ownership interest in

1:22:33 9

that company?

1:22:33 10

A. No.

1:22:34 11

Q. Have you ever been a director of that company?

1:22:36 12

A. No.

1:22:37 13

Q. Have you ever been employed by that company?

1:22:39 14

A. No.

1:22:41 15

Q. Have you ever - by the way, when you said you

1:22:44 16

were running a node, were you mining Bitcoin?

1:22:47 17

A. No. I actually have no idea how the mining is

1:22:52 18

done. It was hands-off and it was all remotely

1:22:57 19

controlled by Craig or Satoshi.

1:23:00 20

Q. That's what I thought you said. You basically

1:23:02 21

had a computer - Dr. Wright sent you some software to

1:23:08 22

download and told you how to get it running and that was

1:23:10 23

your involvement?

1:23:11 24

A. That was it.

1:23:13 25

MS. McGOVERN: Object to the form of the question.

1:23:16 1 BY MR. BRENNER:

1:23:16 2 Q. That was it, sir?

1:23:17 3 A. That was it, that was my involvement, except I  
1:23:21 4 had to keep monitoring it to make sure it was running,  
1:23:23 5 which I did.

1:23:24 6 Q. Okay. And then you stopped that, I think you  
1:23:24 7 said, in 2011 --

1:23:26 8 A. 2011.

1:23:28 9 Q. Have you ever heard of a company called  
1:23:30 10 Tulip Trading?

1:23:31 11 A. No.

1:23:32 12 Q. Have you ever had any ownership interest in  
1:23:36 13 Tulip Trading?

1:23:37 14 A. No.

1:23:38 15 Q. Have you ever been employed by Tulip Trading?

1:23:40 16 A. Can I stop you there --

1:23:41 17 Q. Sure.

1:23:45 18 A. -- and get clarification on the way I answer?  
1:23:47 19 Have I ever heard of Tulip Trading? Before the last week  
1:23:56 20 or so, have I ever heard of Tulip Trading? The answer  
1:24:00 21 would be absolutely no. But, as I said, I've been trying  
1:24:04 22 to do some reading and I see Tulip Trust - I'm not sure  
1:24:11 23 about Tulip Trading - but Tulip Trust, I'm sure it said  
1:24:17 24 Tulip Trust - mentioned on the internet.

1:24:21 25 Q. You did some internet research and you saw

1:24:23 1 something about Tulip Trust?

1:24:25 2 A. I believe so, yes.

1:24:27 3 Q. What did you see?

1:24:30 4 MS. McGOVERN: Object to the form of the question.

1:24:31 5 THE DEPONENT: There are reports on this court case  
1:24:36 6 reported on blog pages on the internet. There are a lot  
1:24:40 7 of them.

1:24:41 8 BY MR. BRENNER:

1:24:42 9 Q. Other than what you saw recently, in the last  
1:24:44 10 week or so, when you were looking on the internet, you  
1:24:46 11 had no involvement/ownership/affiliation at all with any  
1:24:51 12 Tulip Trust or Tulip Trading?

1:24:54 13 A. No.

1:24:55 14 Q. It's not correct or --

1:24:56 15 A. Yes, that's correct, that's correct, I did not  
1:24:59 16 have any knowledge of or involvement in or interest in  
1:25:03 17 anything at all that had Tulip Trust in it - I was nearly  
1:25:10 18 going to say anything that said Tulip, but that would be  
1:25:13 19 wrong, because I was a flower grower.

1:25:16 20 Q. Not Tulip Trading either, correct? The same  
1:25:20 21 answer for Tulip Trading, correct?

1:25:23 22 A. Yes, the same answer, and that answer was no.

1:25:26 23 Q. Okay. The answer is yes, it's correct, what I  
1:25:29 24 said?

1:25:29 25 A. Yes, it's correct.

1:25:31 1 Q. Have you ever been in any business with  
1:25:33 2 Dr. Wright?

1:25:34 3 A. No.

1:25:35 4 Q. Have you ever been in any business with  
1:25:37 5 Lynn Wright?

1:25:37 6 A. No.

1:25:39 7 Q. You know who Lynn Wright is, don't you?

1:25:41 8 A. Yes, his first wife.

1:25:43 9 Q. And have you ever been in any business with  
1:25:47 10 Dr. Wright's current wife, Ramona?

1:25:49 11 A. No.

1:25:53 12 Q. Do you know when in 2011 you stopped running  
1:25:57 13 that node?

1:26:00 14 A. I can't remember, but if I can generalize, I  
1:26:06 15 believe it was reasonably early in 2011, because of other  
1:26:12 16 things I did afterwards, so I would say it was early in  
1:26:16 17 2011.

1:26:17 18 Q. Okay. And do you recall how many computers you  
1:26:21 19 had running?

1:26:25 20 A. How many computers I had running?

1:26:27 21 Q. Yes. During the nodes, how many machines were  
1:26:30 22 you running?

1:26:31 23 A. One.

1:26:32 24 Q. Just one?

1:26:32 25 A. That single Dell XPS computer.

1:26:37 1 Q. Remind me what city were you living in then?

1:26:40 2 A. I was living in Silvan, which is up in the  
1:26:43 3 mountains outside of Melbourne.

1:26:45 4 Q. Can you spell that?

1:26:47 5 A. S-I-L-V-A-N. It was on a farm.

1:26:55 6 Q. Okay. And were you --

1:26:59 7 A. But we had lots of computers, though, because  
1:27:02 8 it was a reasonable-sized business and we had several  
1:27:07 9 accounting computers, we had a big Dell server system set  
1:27:17 10 up with all - uninterruptable power supplies and so on,  
1:27:21 11 but that wasn't in my home, that was up in the packing  
1:27:25 12 sheds, and they weren't - those computers weren't owned  
1:27:28 13 by me, they were owned by the business.

1:27:31 14 Q. Which business?

1:27:33 15 A. I just - it was a flower growing and marketing  
1:27:36 16 business that I was involved in.

1:27:39 17 Q. Was it your business?

1:27:42 18 A. Yes, myself and my son.

1:27:43 19 Q. Okay. Did Dr. Wright have anything to do with  
1:27:46 20 that business?

1:27:47 21 A. No.

1:27:47 22 Q. Or anything to do with those machines?

1:27:50 23 A. No, not at all. He did visit there and he did  
1:27:54 24 stay with us. Craig did visit and he did stay with us.  
1:28:08 25 However, he had no interest whatsoever in any of those

1:28:11 1 machines, or in the business.

1:28:24 2 Q. The only machine that Craig had an interest in  
1:28:26 3 that you had up in that farm was the one Dell machine  
1:28:35 4 that was running the node?

1:28:40 5 A. Yes. And let me clarify the term "interest".  
1:28:45 6 He had no financial interest in that computer whatsoever,  
1:28:49 7 it was mine, and his only interest was in the software  
1:28:55 8 that he provided for me voluntarily to run on his behalf.

1:29:04 9 Q. The last set of questions. Have you ever heard  
1:29:07 10 of an article called The Satoshi Affair?

1:29:18 11 A. Was that the book that I purchased but was  
1:29:21 12 never delivered last year because it was pulled by the  
1:29:26 13 publisher?

1:29:28 14 Q. I guess. I couldn't know that, sir. Is that  
1:29:31 15 the book? It was --

1:29:35 16 MS. McGOVERN: I object to the form of the  
1:29:36 17 question.

1:29:37 18 BY MR. BRENNER:

1:29:37 19 Q. I withdraw it. It was an article in the London  
1:29:39 20 review of books called The Satoshi Affair. Have you ever  
1:29:44 21 read that?

1:29:45 22 A. No. Should I read it? Should I find it? The  
1:29:52 23 Satoshi Affair?

1:29:52 24 Q. That's up to you, sir. Who's Lisa Edwards?

1:30:01 25 A. Lisa Edwards? She likes to be called Lisa H.

1:30:08 1 Edwards because there is another Lisa Edwards in the film  
1:30:11 2 industry. She's Craig's sister. She is the next one  
1:30:17 3 down in the tier.

1:30:19 4 Q. So your niece?

1:30:20 5 A. I'm her uncle as well. Lisa, Danielle and  
1:30:33 6 Kristen.

1:30:33 7 Q. Did Lisa ever talk to you about the development  
1:30:36 8 of Bitcoin?

1:30:46 9 A. At family meetings - I'll have to answer with a  
1:30:52 10 yes and no. At family meetings we would talk about  
1:30:55 11 Bitcoin and Craig, but it was just family chatter, about  
1:31:03 12 how it was going. She is quite wound up in it and so she  
1:31:12 13 has lots of postings all the time.

1:31:16 14 Q. What do you mean that she is wound up in it?

1:31:23 15 A. She posts performance graphs and she does that  
1:31:31 16 on one of the social media - Twitter.

1:31:38 17 Q. Okay. Was she involved in the development of  
1:31:41 18 Bitcoin with her brother?

1:31:42 19 A. I don't believe so, but - I don't believe she  
1:31:44 20 is technical in any way, so I don't think that would be  
1:31:47 21 possible.

1:31:49 22 Q. Okay.

1:31:50 23 A. She's an actress and an investor in Bitcoin.

1:31:53 24 Q. She's an investor in Bitcoin?

1:31:55 25 A. Yes.



1:31:56 1 Q. What does that mean, she buys Bitcoin --

1:31:58 2 A. Yes.

1:31:59 3 Q. -- or is she an investor in it? Is she --

1:32:01 4 A. Not in the technology. She trades Bitcoin. I  
1:32:07 5 haven't discussed that with her, but it is open to the  
1:32:10 6 world because she posts on Twitter performance graphs and  
1:32:20 7 she - I guess the word is "twits" with other people who  
1:32:24 8 also trade on Bitcoin.

1:32:26 9 Q. Okay.

1:32:27 10 A. I've only been on Twitter for the last several  
1:32:30 11 months. Craig's mother suggested to me that I sign up to  
1:32:38 12 Twitter so that I can follow some of what happens with  
1:32:45 13 Craig and with his new enterprises with Bitcoin.

1:32:52 14 MR. BRENNER: Sir, that's all the questions I have  
1:32:54 15 for you. Thank you so much for your time.

16 THE DEPONENT: Okay.

1:32:56 17 MR. BRENNER: Ms. McGovern may have a few.

1:32:57 18 THE DEPONENT: Okay.

1:32:57 19 MS. MCGOVERN: I have no questions. Thank you so  
1:33:00 20 much, Mr. Lynam. I really appreciate your time today.

1:33:06 21 THE DEPONENT: My pleasure.

22 MR. BRENNER: Madam Court Reporter, do you need  
1:33:08 23 anything from us? We can go off the record.

1:33:08 24 THE VIDEOGRAPHER: Going off the record at  
1:33:12 25 11:33 a.m. End of tape 2. End of videotaped deposition

1:33:16 1

of Don Lynam. Total number of tapes, 2.

1:33:20 2

**(Deposition hearing concluded)**

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**CERTIFICATE OF WITNESS**

I, *Donald Joseph Lynam*, hereby certify that I have read the foregoing pages of my deposition of testimony taken in these proceedings on April 2, 2020, and with the exception of the changes listed below and/or corrections, if any, find them to be a true and accurate transcription thereof.

**ERRATA**

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**CERTIFICATE OF COURT REPORTER**

I, *Karen Wilsmore of Epiq*, hereby certify that the foregoing testimony was recorded by me stenographically and thereafter transcribed by me, and that the foregoing transcript is a true and accurate verbatim record of the said testimony, to the best of my skill and ability.

I further certify that I am not a relative, employee, counsel or otherwise financially involved with any of the parties of the within cause, nor am I an employee or relative of any counsel for the parties, nor am I in any way interested in the outcome of the within cause.

Signed .....  
*Karen Wilsmore*

*Date*.....