

RAMONA WATTS - CONFIDENTIAL
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:18-cv-80176-BB/BR

IRA KLEIMAN, as the personal)
representative of the Estate of David)
Kleiman, and W&K Info Defense)
Research, LLC)
Plaintiffs, .)
)
v.)
)
CRAIG WRIGHT)
Defendant.)

DEPOSITION OF RAMONA WATTS

On

Thursday March 19, 2020

At the offices of:

SCA Ontier
Halton House,
20-23 Holborn,
London EC1N 2JD,
United Kingdom

Taken by:
AMY COLEY, Court Reporter

Plaintiffs' Designations

1 RAMONA WATTS - CONFIDENTIAL
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22 By Daniel Saoul QC
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Also present:

Ms. Alison Green (The Examiner via Telephone)

Ira Kleiman (via Telephone)

Amy Coley (Court Reporter on behalf of Magna Legal Services)

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2 (the deposition commenced at 12.08 p.m.)

3 THE EXAMINER: Miss Watts, what I
4 ask you then is to affirm.

5 (Having duly been affirmed
6 the witness testified as follows)

7 THE EXAMINER: Just to say that
8 I am the examiner in this case. If at any time
9 you want to indicate that you need a break or do
10 not understand a question, or want it repeated,
11 please indicate that loud and I will take that
12 into consideration. I am here also to see that
13 there is fair play as far as questioning is
14 concerned of you.

15 THE WITNESS: Okay.

16 THE EXAMINER: Bearing that in
17 mind, Mr. Brenner is going to be starting by
18 asking you some questions, so if you can remain
19 there it may be that he will wish everybody to
20 identify themselves again for the record.

21 BY MR. BRENNER:

22 Q. Yes, to expedite things, Miss
23 Watts, we met just briefly before the deposition
24 started, but let me formally introduce myself. My
25 name is Andrew Brenner, I represent the plaintiffs

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2 in this lawsuit which involves your husband,
3 Dr. Craig Wright. Do you understand that?

4 A. I do, yes.

5 Q. Okay. On the plaintiff's side
6 attending this deposition remotely are Vel
7 Freedman, he is from the law firm of
8 Roche Cyrulnik & Freedman; Samantha Licata is from
9 my office, and Ira Kleiman, who is one of the
10 plaintiffs in the law suit, is also attending
11 remotely. I would ask counsel for the defendant
12 and counsel for the witness to briefly introduce
13 themselves so we can move forward.

14 MR. SAOUL: Yes, my name is Daniel
15 Saoul QC, I am counsel for Miss Watts. I am here
16 with and instructed by Mr. Paul Ferguson and
17 Nicholas Dawson of SCA Ontier solicitors in
18 London. We act for Miss Watts.

19 MS. McGOVERN: This is Amanda
20 McGovern, I am here with my colleague Julio Paez.
21 We represent Dr. Craig Wright in this case.

22 BY MR. BRENNER:

23 Q. Thank you. Miss Watts, can you
24 state your full name for the record and spell your
25 last name?

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2 A. I am Ramona Watts, W-A-T-T-S.

3 Q. And Miss Watts, where is your
4 permanent place of residence?

5 A. So currently I reside in [REDACTED],

6 [REDACTED] [REDACTED]

7 Q. In [REDACTED]

8 A. Yes.

9 Q. Thank you ma'am. Have you ever had
10 your deposition taken before in a US proceedings?

11 A. No.

12 Q. Okay, well, Ms. Green gave you some
13 of the instructions, but I think the most
14 important thing to keep in mind today, especially
15 because of the remote attendance, is to do your
16 best to try to let me finish my question, even if
17 you have a pretty good idea of where it is
18 going just by how it started, okay?

19 A. Okay.

20 Q. And I am going to do my best to let
21 you finish your answer, but importantly, if I
22 don't let you finish your answer, if I cut you off
23 I will have done so inadvertently and you just
24 need to let me know and I will step back and let
25 you finish what you were saying, okay?

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2 A. Okay.

3 Q. And sometimes I have the tendency
4 to talk a little quickly, so if you just need me
5 to slow down, just give me the "hi" sign and ask
6 me to slow down and I will do that, okay?

7 A. I will.

8 Q. Ma'am, what is your date of birth?

9 A. [REDACTED] 1970.

10 Q. 70?

11 A. Yes.

12 Q. You are in fact married to
13 Dr. Craig Wright?

14 A. I am.

15 Q. And how long have you two been
16 married?

17 A. We were married in 2013.

18 Q. Okay. When did you meet
19 Dr. Wright?

20 A. At the end of 2010.

21 Q. When you met him, what were the
22 circumstances in your meeting?

23 MR. SAOUL: I am going to object to
24 that question, Mr. Brenner. I object reluctantly,
25 but you have three categories of topics which the

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2 English High Court, Commercial Court has
3 identified for questioning, including educational
4 background, employment history, professional
5 qualifications, personal preparation for the
6 deposition, that is (a); statements made by
7 Mr. Wright about certain matters, that is (b); and
8 Miss Watts' knowledge of the issues in (b) and
9 through other means is (c). I am afraid that the
10 question you asked does not fall within any of
11 those categories so it is not permissible as a
12 matter of English law.

13 MR. BRENNER: Okay. I disagree. I
14 would ask you to give me some leeway. Part of
15 what has happened here is, you were not there, but
16 in the deposition of Dr. Wright, he answered
17 several questions of along the lines of, "Don't
18 ask me, ask Miss Watts, I am no longer involved in
19 businesses". I need to know -- I am not trying to
20 pry into the personal relationship, I am trying to
21 draw a line of where Miss Watts is acting in a
22 business partner role or where she is acting as a
23 spouse, because spousal privilege has ben
24 asserted. So I will ask you to give leeway and it
25 will be quick, but I just want to know where --

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2 whether they started at business associates or as
3 something else.

4 A. We started as business associates
5 in 2011.

6 BY MR. BRENNER:

7 Q. Okay. Then some time after that
8 obviously the relationship changed and you
9 ultimately got married in 2013?

10 A. Yes.

11 Q. And you have remained married since
12 then?

13 A. Yes.

14 Q. Now, currently are you involved in
15 several businesses with Dr. Wright?

16 A. Not any more, no.

17 Q. Okay. What I would like to do,
18 I would like to start by going to tab 4, which is
19 actually two different tabs, only because one is a
20 place marker to give a number, a court number,
21 because the file behind it is a native file. Do
22 you see that?

23 A. Yes, I do.

24 Q. So tab 4 will become an exhibit to
25 this deposition, as exhibit 1.

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2 (Exhibit 1 was marked for identification)

3 Q. So the first page as a number on
4 it; correct?

5 A. Yes.

6 Q. And is that number DEF 00022425?

7 A. Yes, the next one, so produced in
8 native format, yes.

9 Q. Okay. Then I will represent to you
10 that the next page is the native format file that
11 was produced ----

12 A. Sure.

13 Q. -- in this litigation by counsel
14 for your husband, okay?

15 A. Okay.

16 THE COURT REPORTER: Can I just
17 mark the deposition on the record?

18 MR. BRENNER: Sure.

19 THE EXAMINER: I was going to ask
20 you to do that, and I think we should always make
21 it clear that that has been done, because we want
22 to be able later to identify it ----

23 MR. BRENNER: Sure.

24 THE EXAMINER: -- clearly when not
25 everybody is going to be present in Miss Watts'

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2 presence.

3 BY MR. BRENNER:

4 Q. Miss Watts, are you looking at what
5 I will call the spreadsheet part of ----

6 A. I am.

7 Q. -- exhibit 4?

8 A. Yes.

9 Q. If you will look, starting on the
10 far left hand column, there is a list of entities;
11 do you see that?

12 A. Umm hmm, yes, I do.

13 Q. It is fair to say you recognise
14 each of those entities, correct?

15 A. Yes, I do recognise them all, yes.

16 Q. Okay. Now if you go over -- when
17 I say over, I am sort of going across columns ----

18 A. Yes.

19 Q. -- there is a column that I think
20 it is the last column, and it says "directors"; do
21 you see that?

22 A. I do, yes.

23 Q. Okay, so as I go through that
24 spreadsheet for every one of these companies --
25 well, every one of these companies with the

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2 exception of the second to last one, which is --
3 it appears to be Chaos, or is that the third to
4 last one -- every one you are listed as a director
5 other than Chaos; is that right?

6 A. From what it shows on this
7 spreadsheet it appears it would be, yes.

8 MR. SAOUL: I am going to note for
9 the record that from what I can see on this
10 document, there are no directors identified for
11 the last entity, either.

12 MR. BRENNER: Yes, I know. I was
13 going to ask that. Thank you. And we will clear
14 that up.

15 BY MR. BRENNER:

16 Q. The last entity that is listed on
17 this particular document is an entity called
18 Hotwire Preemptive Intelligence Pty Ltd; do you
19 see that?

20 A. I do.

21 Q. What is that?

22 A. It was another one of the companies
23 that we were working for, or working on.

24 Q. When you sate "we" what do you mean
25 by we?

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2 A. Craig and I. We also had staff by
3 the way. So I think with Hotwire we might have
4 had 40-odd staff.

5 Q. Right. You actually held a title
6 in Hotwire didn't you?

7 A. Yes.

8 Q. And you were chief people officer?

9 A. I was, yes.

10 Q. Were you a director of Hotwire?

11 A. I don't recall. I might have been,
12 but I would have to see the corporate records.

13 Q. Sure. For all of the other
14 entities on this sheet, other than Chaos, at least
15 according to the sheet you at one time a director.
16 Is that accurate?

17 A. I don't recall because I know I was
18 director of quite a few companies, and I don't
19 know where this came from. We had a secretarial
20 company do our corporate records for us. So
21 I suppose if it came directly from them it would
22 be accurate. As I said, because I don't know
23 where this came from I cannot actually speculate
24 to say if this is accurate or not.

25 Q. Okay, but ----

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2 A. But I was a director of several
3 companies, yes, at different stages.

4 Q. Currently are there any companies
5 on this list that you are no longer a director
6 for?

7 A. All of them.

8 Q. So let's -- so you are no longer a
9 director for any of these companies, just to make
10 sure I understand your testimony?

11 A. That's right.

12 Q. When did you cease being a director
13 for DeMorgan Limited?

14 A. That would have been -- I am not
15 sure if it is 2016 or 2017. I believe it might
16 have been 2016. I don't recall, so I really would
17 have to see, I put in my resignation, so I would
18 have to see some corporate paperwork.

19 Q. If we are just looking at DeMorgan
20 for a second, who is Alan Granger?

21 A. He was a director.

22 Q. Is he still a director?

23 A. No.

24 Q. Okay. Who is David Jensen?

25 A. He was another director.

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2 Q. Is he still a director?

3 A. No, DeMorgan doesn't exist any
4 more.

5 Q. Okay, so that was my next question.
6 So no one is a director of DeMorgan Limited
7 because it doesn't exist any more?

8 A. That's right.

9 Q. What about Cloudcroft PTY, when did
10 you cease being a director?

11 A. I don't recall.

12 Q. Why did you cease being a director?

13 A. I don't recall. A lot of these
14 companies either have been shut down or in the
15 process of being shut down.

16 Q. Do you know if there are any
17 directors of Cloudcroft currently?

18 A. No, I don't know.

19 Q. The next one is CO1N PTY LTD --
20 C-O-1-N PTY LTD. Who is Uyen Ng?

21 A. I believe that might be Uyen
22 Nguyen, she was one of our interns.

23 Q. Okay, and she was a director of
24 that company?

25 A. According to this document, I don't

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2 recall otherwise, but this document says she is.

3 I don't know.

4 Q. Mohammed Shaleeb(?), who is that?

5 MR. SAOUL: Mr. Brenner, I entirely
6 accept that you are entitled to ask Miss Watts
7 about her employment history. As you know, we
8 have had correspondence with your firm about
9 keeping that reasonably limited, which you agreed
10 to do. I am unsure for myself as to whether it is
11 fair to suggest that questions about other
12 directors really do fall within the category of
13 employment history. I just put a marker down. If
14 this questioning is not going to be significant
15 then I am happy to be relaxed about it. But if
16 there is going to be detailed questioning about
17 matters going beyond what is actually her
18 employment history, then we might run into a
19 difficulty.

20 MR. BRENNER: Sure. If you look
21 further down, we are only going to be about three
22 more people, because the rest of them are just
23 Miss Watts or Miss Watts and Dr. Wright, so it
24 will be quick.

25 BY MR. BRENNER:

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2 Q. Mohammed Shaleeb, who was that?

3 A. He was someone who worked with
4 Craig.

5 Q. Is he still a director of this
6 company?

7 A. I really don't know.

8 Q. The next one is Coin-Exch PTY LTD,
9 do you see that?

10 A. I do.

11 Q. That one lists shareholders, the
12 share structure of the company, as some of these
13 others do, do you see that?

14 A. Hmm hmm.

15 Q. It says that the shareholders in
16 that company are Dr. Wright, do you see that?

17 A. I do.

18 Q. And Mr. Kleiman, Ira Kleiman, do
19 you see that?

20 A. I do.

21 Q. Are they both shareholders in that
22 company?

23 A. I don't know.

24 MR. SAOUL: That does, I think in
25 fairness, go beyond the scope of the permitted

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2 deposition. Mr. Brenner, I am going to police the
3 English court order quite carefully. I am not
4 going to interrupt questions which clearly fall
5 within the scope of the order. But questions such
6 as that do not concern any of the matters in the
7 order, unless you can explain to me otherwise. I
8 am happy to be persuaded otherwise, I am happy to
9 have a debate about it, but on the face of it that
10 is not a question that falls within the scope of
11 what you sought from the judge in Florida or
12 obtain from the English High Court.

13 MR. BRENNER: Well, I will say this
14 and I cannot obviously advise you to what position
15 to take. I can only tell you that I feel 100%
16 comfortable that a US court would find this well
17 within the realm of the testimony of this witness
18 and the US court has ordered this deposition to go
19 forward, and there will be potential consequences
20 for the US case if the witness is not allowed to
21 answer certain questions, but you have to do what
22 you have to do. I get it, you will do what you
23 have to do. I don't want -- this is the type of
24 thing I don't want to spend our time with.
25 I don't want to debate with you. If you want to

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2 instruct her not to answer, then we will have to
3 deal with it later.

4 MR. SAOUL: I am not going to
5 instruct her not to answer that question, but I am
6 just asking you to be careful, because the concept
7 of what the witness might be answering on a broad
8 blanket basis in Florida is different from the
9 question of what you have sought and obtained
10 permission to ask her questions about pursuant to
11 the English High Court order, which is much more
12 narrow.

13 MR. BRENNER: Okay, we will agree
14 to disagree and again, if we could try to move
15 forward, it will help us meet our intended time
16 frame.

17 MR. SAOUL: Absolutely.

18 BY MR. BRENNER:

19 Q. Miss Watts, I am now on row 8,
20 which is -- how do you pronounce that, the company
21 on row 8?

22 A. Panoptocrypt.

23 Q. No, Denariuz, do you see that?

24 A. No, I have got Panoptocrypt as
25 number 8 of mine.

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2 Q. Yes, don't worry about the row
3 numbering, I am looking at the Excel spreadsheet
4 ----

5 A. Oh, I am sorry, I don't have that.
6 Denariuz?

7 Q. Yes, Denariuz. Denariuz you were a
8 director for; correct?

9 A. As I said before, I don't know
10 where this information came from, so I don't know.
11 I was a director of several companies. You are
12 asking me about being a director of companies
13 several years ago. I do not recall. If I had the
14 proper company records in front of me then I would
15 be able to say yes, I was. I would be able to say
16 who the shareholders were if I had a shareholders
17 agreement in front of me. But I don't know where
18 this came from so I cannot recall.

19 Q. Okay, that is fair. I can only
20 tell you this came from your husband's lawyers,
21 but I don't know where it came from either.
22 Currently are you a director of Denariuz?

23 A. So, as I answered earlier, I am
24 currently not a director of any of these
25 companies.

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2 Q. Are you currently a director of any
3 companies?

4 A. I have just been made director,
5 actually -- well, not just -- in January, of two
6 companies.

7 Q. And what are they called?

8 A. Wright International and Tulip
9 Trading.

10 Q. And you became a director in
11 January of those?

12 A. I think it was January or February,
13 yes.

14 Q. Okay we will get back to that,
15 Wright International and Tulip Trading?

16 A. That is right.

17 Q. Okay. Let me just finish up this
18 line of questioning on the spreadsheet, just to
19 identify the last few people, who is Lian Seng
20 Ang?

21 A. That would be my father.

22 Q. He was -- regardless of what the
23 document says, do you recall him being a director
24 of one or more of these companies?

25 A. I recall him being a director of

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2 something for a short time and he resigned, so
3 I don't remember the circumstances of it. We took
4 minutes of meetings that we had with him. As
5 I said, without the corporate records I cannot
6 give you any answers.

7 Q. You made a reference earlier that a
8 lot of these companies either have dissolved or
9 are in the process of being dissolved; is that
10 correct?

11 A. That is right, yes.

12 Q. As you look at this list are any of
13 these companies either not dissolved or at least
14 not in the process of being dissolved?

15 A. I don't know. I don't know
16 I believe, to my knowledge, that they are all
17 either dissolved or in the process of being
18 dissolved, but I truly do not know.

19 Q. Now, you told me that you were
20 recently made a director of Wright
21 International -- is that the full name for it,
22 Wright International?

23 A. That is what I call it. I don't
24 know its full name.

25 Q. Okay. And that happened you think

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2 some time earlier this year?

3 A. That's right.

4 Q. Are there any other directors of
5 Wright International?

6 A. I don't know, I have only just been
7 made director, so I haven't had all the corporate
8 records yet. I am trying to get myself up-to-date
9 with that. I haven't got any of that information.
10 My lawyers do though.

11 Q. What is Wright International?

12 A. So it was a company that Craig
13 started I believe in -- I don't remember the year,
14 I believe it was in 2009.

15 Q. Do you know what it does, what that
16 company does?

17 A. Well, currently it holds mined
18 Bitcoin.

19 Q. Does it hold -- excuse me, let me
20 backtrack. Does it hold Bitcoin mined by
21 Dr. Wright?

22 A. No, it holds Bitcoin that was mined
23 by Information Defence.

24 Q. Information Defence, is that the
25 full name of that company?

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2 A. I do not know, this was before my
3 time, by the way, because I didn't know Craig in
4 2009.

5 Q. Okay. Is it your understanding --
6 and I am just jumping off your answer. Sometimes
7 I will do that, and if I have just misunderstood
8 what you said, you let me know, okay?

9 A. Sure.

10 Q. From your answer it sounds like
11 what you are telling me is Wright International
12 holds Bitcoin that was mined by something called
13 Information Defence in 2009?

14 A. That is from my understanding, that
15 is correct.

16 Q. Do you know if Information Defence
17 was called W&K Information Defence?

18 A. No, no it wasn't.

19 Q. It was not?

20 A. No.

21 Q. Do you know what kind of company
22 Information Defence was?

23 A. No, it was before my time.

24 Q. Okay. It is not until 2020 that
25 you first became a director in that company?

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2 A. That is correct, yes.

3 Q. Other than that, that the company
4 holds mined Bitcoin, does it do anything else?

5 A. Well, as I said, I only just became
6 director so I don't actually know what else it
7 might do.

8 Q. Okay. Are you also employed as --
9 I don't mean to be obtuse, but you could be a
10 director of a company but not actually employed by
11 them; do you understand that?

12 A. Yes.

13 Q. Are you employed also by Wright
14 International?

15 A. No.

16 Q. Do you draw any pay from Wright
17 International?

18 A. No, I do not.

19 Q. Are there any other directors of
20 Wright International?

21 A. I don't know.

22 Q. You don't know, okay. Do you
23 understand what your job is as a director of
24 Wright International?

25 A. Well, I understand what a director

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2 has to do, and that is basically you have
3 oversight over the company, but for Wright
4 International currently I don't know because
5 I have only just been a director, I need to the
6 corporate records, I need to go through everything
7 and I have not had a chance to do that yet.

8 Q. The second one that you told me,
9 the second company you told me that you are a
10 currently a director for you called it Tulip
11 Trading?

12 A. That's right.

13 Q. Is that -- as best you know is that
14 the full name for that?

15 A. As best I know. It might be Tulip
16 Trading Limited, it might be -- I don't know.

17 Q. Sure. When did you -- is that also
18 in the early 2020 time frame, when you became a
19 director?

20 A. That's correct, yes.

21 Q. By the way, who made you a director
22 of Wright International?

23 A. I don't think anybody just makes
24 you a director. It was decided. We had previous
25 directors, but I am not quite sure what happened

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2 to them. So I think a lot of them couldn't fulfil
3 their duties, so I have decided that -- well, we
4 sat down and we actually had a meeting. The trust
5 actually has shares in these two companies so
6 there is Tulip Trust, and it shares in Wright
7 International and Tulip Trading. So we decided
8 that we actually needed someone to be able to
9 manage the companies properly because these
10 directors were not doing their jobs.

11 Q. We will get this into later, but
12 when you just talked about a trust, are you
13 talking about the Tulip Trust from 2017?

14 A. It is really the Tulip Trust from
15 2011, it is the same trust that we set up in 2011.

16 Q. Was it updated in 2017?

17 A. It was, yes, it was updated several
18 times though, between 2011 and I think the last
19 time we updated it would have been 2017, yes.

20 Q. And you are the trustee of that
21 trust; correct?

22 A. I am, that is right.

23 Q. The sole trustee; correct?

24 A. No, we have another trustee as
25 well.

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2 Q. Who is that?

3 A. Denis Mayaka.

4 Q. Are you sure that he is a
5 co-trustee on that?

6 MR. RIVERO: Objection to the form.

7 BY MR. BRENNER:

8 Q. You can answer.

9 A. It is my understanding that he is
10 still a trustee but I could be mistaken.

11 Q. Okay you said -- does the trust own
12 all the shares in Wright International and Tulip
13 Trading?

14 A. It does, yes.

15 Q. When you answered my question a few
16 questions ago, you said, "We had a meeting and we
17 decided that someone should be a director that can
18 oversee those companies", do you recall testifying
19 to that?

20 A. Yes.

21 Q. Who was the "we"; who had that
22 meeting?

23 A. So the members of the trust.

24 Q. Who was that?

25 A. So I am not -- as trustee of the

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2 trust I am not sure under Seychelles law if I am
3 actually permitted to reveal the members and
4 beneficiaries of the trust. You actually have a
5 trust document, I believe, so if you have the
6 correct trust document then it would be documents
7 that you have and you can look at that.

8 Q. Okay, well let's look at, just so
9 we make sure we are talking about the same thing,
10 if you could turn to ----

11 MS. McGOVERN: Mr. Brenner, this is
12 Amanda McGovern. While you are looking for that
13 document, I would like to state for the record
14 something we should have stated at the beginning,
15 which is that we would like this deposition in its
16 entirety to be marked confidential under the order
17 governing this proceedings and note that the trust
18 documents of July 2017 is under seal, and that all
19 exhibits to this deposition would also be
20 confidential under the terms of the order, similar
21 to Dr. Wright's deposition.

22 MR. BRENNER: So my understanding
23 is there is a protection order in place that
24 governs the sealing of all or parts of a
25 deposition or exhibits thereto, and we fully

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2 intend to comply with that order. So you have
3 made -- I understand your position, I understand
4 we will both just follow the order as to what that
5 means down the road. But I have no objection to
6 what you are saying right now and we will ----

7 MS. McGOVERN: It is really for the
8 purpose of clarifying. I believe we have to
9 assert that ----

10 MR. BRENNER: I agree.

11 MS. McGOVERN: -- will be maintained
12 confidential as opposed to, it is not an automatic
13 thing. So I am simply asserting that this
14 deposition in its entirety, along with the
15 exhibits, will be confidential under the terms of
16 the protective order.

17 MR. BRENNER: Thank you.

18 BY MR. BRENNER:

19 Q. If you look, I had it wrong, it is
20 tab 33, do you see that, Miss Watts?

21 A. I do, yes.

22 Q. We have been having some questions,
23 some back and forth, and we were referring to a
24 document but we were not looking at them. The
25 document we referred to as the update of the trust

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2 from 2017, is this the correct document, tab 33?

3 A. That is right, it is.

4 Q. We will mark that as exhibit 2 to
5 the deposition?

6 THE EXAMINER: Could you let the
7 court reporter have time to mark it.

8 (Exhibit 2 was marked or identification)

9 A. I have not read the entirety of it,
10 I am assuming it is the same one that I have.

11 Q. Okay.

12 A. I will not spend time to read the
13 entirety of it.

14 MR. BRENNER: As she is reading,
15 Madam Court Reporter, I think it will be better,
16 instead of marking the tab, to mark the actual
17 document.

18 THE COURT REPORTER: Okay.

19 A. If this is the document that you
20 received from my US lawyers, it would be the one
21 you have, so yes.

22 BY MR. BRENNER:

23 Q. Thank you. You told me, and I want
24 to make sure we have the sort of terminology
25 consistent with each other. You told me that the

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2 meeting at which it was decided you would become a
3 director of Wright International and Tulip
4 Trading, was among -- you used the words, both the
5 beneficiaries and the members of the trust; do you
6 recall testifying to that.

7 A. That is correct, I suppose I use
8 that interchangeably, but yes.

9 Q. So when I look at the document, and
10 I ask you to do the same thing, can you tell me
11 were in the document it identifies the people that
12 were at that meeting?

13 A. So, it would be page 16, schedule
14 B.

15 Q. Let me get there. Okay. So on
16 page 16 it lists five individuals; correct?

17 A. That is correct, yes.

18 Q. All members of your family;
19 correct?

20 A. That is correct.

21 Q. Okay, and are you telling me that
22 those five people had a meeting some time on or
23 shortly before the beginning of 2020, in which it
24 was decided you would become a director of Wright
25 International and Tulip Trading?

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2 A. Yes, that is correct.

3 Q. Anyone else at this meeting?

4 A. No.

5 Q. Mr. Mayaka?

6 A. No, he was not present at that
7 meeting.

8 Q. Okay. You told me your
9 understanding of what Wright International does.
10 What is your understanding of what Tulip Trading
11 does?

12 A. Well, Tulip Trading actually holds
13 bought assets, so Tulip Trading had assets that
14 were bought from -- I cannot actually remember
15 where they were bought, they were bought Bitcoin
16 in 2011.

17 Q. You said the -- before you used the
18 word "assets" you used the word "bought" --
19 B-O-U-G-H-T?

20 A. That's right.

21 Q. Other than Bitcoin that had been
22 bought what other assets does Tulip Trading hold?

23 A. I don't recall.

24 Q. Okay, so the only assets that you
25 can recall that are held by Wright International

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2 and Tulip Trading are Bitcoin; correct?

3 A. That is the only assets that I can
4 recall, yes.

5 Q. And the difference between the two,
6 or one of the differences between the two, is the
7 Wright International Bitcoin was Bitcoin that was
8 mined by Information Defence, correct?

9 A. That is what I understand.

10 Q. Okay, and Tulip Trading Bitcoin was
11 purchased, as opposed to mined by an entity
12 associated with Dr. Wright; correct?

13 A. That's correct.

14 Q. Do you know how much Bitcoin Wright
15 International has?

16 A. I don't, no.

17 Q. Approximately?

18 A. I really don't.

19 Q. And I think I asked you this, but
20 maybe I didn't, are there any other directors of
21 Wright International?

22 A. So currently I don't know if there
23 are because I haven't had a look at the corporate
24 records yet.

25 Q. And what about Tulip Trading; any

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2 other directors other than you?

3 A. That would be the same answer as
4 the other one; I don't know because I haven't
5 looked at it yet.

6 Q. Do you know how much Bitcoin Tulip
7 Trading has?

8 A. I don't. It had -- I really don't
9 know how much, but I think that Tulip Trading was
10 actually managed by a company called HighSecured
11 and they were managing the Bitcoin that was bought
12 then.

13 Q. So let me make sure I understand.
14 The Tulip prior to you becoming -- some time prior
15 to you becoming director, Tulip Trading was
16 managed by something called High Point?

17 A. HighSecured.

18 Q. Tulip Trading was managed by
19 HighSecured?

20 A. That is right.

21 Q. Is HighSecured a law firm?

22 A. Yes. I don't know if they exist
23 any more but they are a law firm, were, are.

24 Q. Are or were a law firm?

25 A. Yes. Well, we used them.

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2 I communicated with them, they were a law firm.

3 I don't know if they exist any more.

4 Q. And at some point HighSecured
5 stopped managing Tulip Trading?

6 A. I believe so. I think there were
7 some problems with HighSecured.

8 Q. Do you recall what those were?

9 A. Not really. We couldn't get ahold
10 of them, that was the main problem.

11 Q. So you have a tendency sometimes,
12 and I understand it, to use the word "we" a lot.

13 A. Yes.

14 Q. When you just used the word "we"
15 who were you referring to?

16 A. Well, it would be the people in the
17 company working at that time. So when I was
18 dealing with HighSecured, it was me and I think it
19 might have been one of our accounts, I don't
20 recall. I am not sure which one actually. We had
21 several accounts and we had several financial
22 controllers at that time.

23 Q. Okay, so I may have assumed too
24 much from your prior answer, so let me ask you
25 this: Although you just became a director of

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2 Tulip Trading in 2020, when did you begin working
3 with Tulip Trading?

4 A. I never worked with Tulip Trading.

5 Q. Well, I thought you just told me
6 that you were communicating with HighSecured when
7 they were managing Tulip Trading. Is that true?

8 A. That is true, but I never worked
9 with Tulip Trading. So I was always a trustee of
10 the trust. The trust owns shares in Tulip
11 Trading.

12 Q. Okay, got it. So, when you say the
13 trust, you are referring to the Tulip Trust?

14 A. Yes.

15 Q. Right. And your understanding of
16 the Tulip Trust is that it was originally formed
17 in 2011?

18 A. Well, I know it was, because
19 I helped form it.

20 Q. Okay, it is not just your
21 understanding it is a certainty to you that it was
22 formed in 2011?

23 A. That's right.

24 Q. And I think you told me earlier
25 that over the years it has gone through several

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2 changes and supplements; correct?

3 A. It has, yes. Not big material
4 changes, I mean the terms of the trust are always
5 the trust, the beneficiaries of the trust were
6 always the same, the purpose of the trust was
7 always the same. So the rules were always the
8 same. But in 2012, 2014 and then in 2017 again we
9 sort of made it more rigorous, it was a little bit
10 more finessed, it was worded a little bit better.

11 Q. You obviously know that your
12 husband is involved in a lawsuit in Florida; that
13 is why we are here today, right?

14 A. Yes, that is right.

15 MS. McGOVERN: Object to the form.

16 BY MR. FREEDMAN:

17 Q. Do you know -- were you aware that
18 there was a dispute in the lawsuit regarding the
19 identification of certain trusts?

20 A. Sorry, I don't understand the
21 question.

22 Q. Sure, thank you for asking. Were
23 you aware that in the summer of 2019 that your
24 husband, as a result of this lawsuit, was called
25 upon to reveal certain trust information; do you

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2 know that?

3 A. Only from -- not before the
4 litigation, I did not know it. I know now, yes.

5 Q. Well, it didn't happen before the
6 litigation. The litigation started 2018.

7 A. Yes. I don't have all the details
8 of this litigation, to be perfectly honest with
9 you. I have not read it all because it just
10 stresses me out, I would rather not know, to be
11 perfectly honest.

12 Q. Okay, but you were, in 2019, you
13 were already a trustee for the Tulip Trust?

14 A. Yes.

15 Q. And I will represent to you that at
16 that time, your husband, through his lawyers,
17 submitted to the court a sworn declaration where
18 it identified two different documents as to Tulip
19 Trust 1 and the Tulip Trust 2; were you aware of
20 that?

21 A. No, I was not.

22 MS. McGOVERN: Mr. Brenner, before
23 you go into this line of questioning, the
24 communications regarding this litigation, between
25 Miss Watts and Dr. Wright about this litigation

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2 and about things that occur during this litigation
3 will be privileged. If that is what you are
4 intending to ask her about we object to this line
5 of questioning. We can take it question by
6 question, but I would like to caution that a
7 spousal privilege will apply with respect to the
8 litigation, about the litigation.

9 MR. BRENNER: We will take it
10 question by question. I think so far we have been
11 okay, but I understand your objection. I don't
12 agree with it, but we will take it question by
13 question.

14 BY MR. BRENNER:

15 Q. Miss Watts, let me try to make sure
16 I understand your role with the trusts?

17 A. Sure.

18 Q. First of all, in your mind there is
19 only a single Tulip Trust; correct?

20 A. That is correct.

21 Q. It was formed informally, meaning
22 that the documentation was rather informal, the
23 first iteration of it was in 2011; correct?

24 A. That's correct.

25 Q. Then in 2012 a more formal document

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2 was put in place to memorialise the trust; is that
3 correct?

4 A. Yes, that is correct.

5 Q. Then in 2014 ----

6 MS. McGOVERN: Please give me an
7 opportunity, since we are taking these questions
8 question by question, please give me an
9 opportunity to pose my objection for the record.
10 If you could just pause for two seconds so that
11 the court reporter does not feel like I am
12 speaking over Mr. Brenner, which I have no desire
13 to do.

14 MR. BRENNER: Ms. McGovern is
15 right, Miss Watts. It is difficult -- it is
16 difficult even when we are all in the same room to
17 follow this rule, but it is really difficult when
18 we are in different rooms. So what you should try
19 to do, and frankly you will fall short sometimes
20 and I will fall short sometimes, is just take one
21 extra beat before answering the question. That
22 will give both Ms. McGovern an opportunity to make
23 an objection if she needs to, and it will also
24 give your counsel, who is there ably representing
25 you, to make sure that they have an chance to say

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2 something if they need to say something. Okay?

3 A. Okay.

4 MR. BRENNER: For the record,
5 I would just note that I appreciate the fact that
6 due to the circumstances beyond all of our control
7 the schedule of this became difficult, and
8 I appreciate that the law firm of SCA Ontier
9 offered their offices at the last minute after the
10 Boies Schiller offices closed, and I appreciate
11 the courtesy.

12 BY MR. BRENNER:

13 Q. Let me go back to where I was, Miss
14 Watts. I think we covered that the 2012 was a
15 more -- a formalisation of the 2011 trust
16 formation; correct?

17 MS. McGOVERN: Object to the form.

18 BY MR. BRENNER:

19 Q. Yes?

20 A. From what I recall, if I can tell
21 you what I recall. Craig and I had a conversation
22 in 2011, about the trust, how he wanted it
23 structured, and the main thing was what the
24 purpose of the trust was going to be. So it was
25 the purpose, we set down rules, we set down very

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2 specific terms. So that was in 2011. In 2012
3 I believe -- I actually cannot remember which
4 lawyers we had, but I think we might have changed
5 lawyers in 2012, I do not recall. So we had a
6 trust document in 2011 and then we firmed it up
7 again in 2012. In 2014 we changed a few things
8 and I really cannot remember what it was. It was
9 not purpose or rules of the trust, but we might
10 have added a few things to it, I cannot remember.
11 In 2017 we actually used -- we were in the UK at
12 that time and we used Baker & McKenzie and a
13 couple of other firms to firm up a proper
14 registered trust document.

15 Q. Then, just to complete the sort of
16 progression, in 2017 what happened?

17 A. Well, as I said, so we had the
18 trust document from -- well, we had -- we had
19 spoken about the trust in 2011, 2012. I mean
20 really we had spoken about the trust quite a bit,
21 but in 2017 we decided that we were going to
22 register it formally I think; we were told that it
23 had to be done properly. And so we spoke to Baker
24 & McKenzie, who were then -- they gave us another
25 name and I cannot remember who it was, but we used

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2 another law firm, and we worked with them for a
3 little while. Frankly, they were very longwinded
4 and they were very expensive, so we asked Denis
5 Mayaka if he had any law firms in his contacts
6 that could help us. So then we had sort of a
7 partial draft with Baker & McKenzie and this other
8 law firm that they had recommended to us, and then
9 Denis and his team put together something that was
10 exactly what we wanted.

11 Q. In 2017?

12 A. Well, yes, but it was the trust
13 from 2011, so it is not a different trust, it is
14 the same trust.

15 Q. Right, I understand your testimony,
16 so I am going to try to walk through it again.

17 A. Yes.

18 Q. In 2011, it is the initial
19 formation of the Tulip Trust?

20 A. That's right.

21 Q. It goes through -- that trust
22 existed in 2011 and it exists today?

23 A. Yes.

24 Q. Okay. The documentation on that
25 trust has been updated in 2012, 2014, and 2017?

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2 A. I believe that is the case.

3 I mean, I truly don't remember the exact dates.

4 Q. Okay. At all times, meaning from
5 2011 through today, have you been a trustee of
6 that trust?

7 A. Yes, I believe so. To my
8 understanding I believe I have been.

9 Q. Okay. Now, I think what you said,
10 and you will correct me if I am wrong, I think
11 what you said is that the general rules and more
12 importantly the purpose of the trust have not
13 changed?

14 A. Absolutely not, no.

15 Q. Bad questioning gets an unclear
16 answer for the record. You agree with me that the
17 rules for the trust and the purpose of the trust
18 have not changed since 2011?

19 A. The rules and the purpose of the
20 trust have not changed at all.

21 Q. Okay. What was or is the purpose
22 of the Tulip Trust?

23 A. Oh, the purpose of the trust has
24 always been the same, and that is to continue the
25 work of what Craig has been doing, that is his

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2 research in Bitcoin, and to promote Bitcoin,
3 Bitcoin's legal nature, really. So in 2011 when
4 we first talked about it he was very upset because
5 he had told me that Bitcoin was being used on
6 something called Silk Road, where people were
7 buying drugs and there was money laundering, and
8 he never intended for Bitcoin to be used for those
9 sorts of things. So he was cross and he was very
10 upset. So he said that, you know, we're going to
11 have this trust, and we are going to make sure
12 that the purpose of the trust and the rules of the
13 trust are such that Bitcoin is used in a legal
14 manner. And we are going to use it to continue
15 research in Bitcoin, to possibly fund companies
16 they are doing work that can, you know, continue
17 on the peer-to-peer research and do things that
18 are legal, without the illegal nature of Bitcoin.
19 He totally did not want to have anything to do
20 with that at all.

21 Q. Great. And you understood that, as
22 trustee, it was your job to comply with and
23 further that purpose?

24 A. Absolutely, yes.

25 Q. Let us go back to 2011, since it is

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2 really just one trust, okay?

3 A. Yes.

4 Q. In 2011, how was the trust funded?

5 A. How? Sorry, I don't actually
6 understand your question. The trust did not need
7 funds. The trust is an entity on its own, so.

8 Q. That was a bad question. Let's try
9 again. In 2011, were there assets placed in the
10 trust?

11 A. So, the trust holds shares in
12 companies.

13 Q. Let us back up. In 2011, did the
14 trust own the shares of Wright International?

15 A. I believe it did, yes.

16 Q. And at the time Wright
17 International -- I think you told me this before,
18 but at the time the trust was formed, did Wright
19 International hold all of the Bitcoin mined by
20 Information Defence?

21 A. I believe so.

22 Q. And the trust owned all of the
23 shares of Wright International?

24 A. I don't know, but to my knowledge
25 I think so. I do not know for sure.

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2 Q. Okay. In 2011 did the trust also
3 own the shares in Tulip Trading?

4 A. I do not recall. It might have
5 been around the same time that Tulip Trading was
6 formed.

7 Q. Right. You understand that Tulip
8 Trading -- well, is it true that Tulip Trading
9 bought Bitcoin at times after 2011?

10 A. I don't know.

11 Q. Okay. In 2011 were you the sole
12 trustee of -- excuse me, of Tulip Trust?

13 A. I don't know. I don't know.
14 I know I was a trustee. I do not think I was the
15 sole trustee, but I actually don't know.

16 Q. Do you know anyone else that has
17 ever been a trustee of Tulip Trading -- excuse me.
18 Do you know anyone else that has ever been a
19 trustee of Tulip Trust other than you mentioned
20 before you thought Mr. Mayaka was; anyone else?

21 A. At some stage Craig was a trustee
22 of Tulip Trust, but I think perhaps at the
23 beginning but not at the end. I don't recall when
24 he stopped being a trustee.

25 Q. It is your understanding that at

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2 some point Craig was a trustee of Tulip Trust but
3 he is no longer a trustee of Tulip Trust?

4 A. He is definitely no longer a
5 trustee, yes, but I don't know when though.

6 Q. When the trust was formed in 2011,
7 since that time, have any -- has Wright
8 International mined any additional Bitcoin?

9 A. Not to my knowledge, but Wright
10 International never mined Bitcoin.

11 Q. Good point. After the trust was
12 formed in 2011, did Information Defence ever mine
13 any Bitcoin?

14 A. Not to my knowledge, but I didn't
15 work for Information Defence, so I don't know.

16 Q. Do you know how Wright
17 International came to possess the Bitcoin mined by
18 Information Defence?

19 A. I don't, no.

20 Q. As far as you know, when you
21 started being a trustee in 2011, Wright
22 International was already the holder of the
23 Bitcoin mined by Information Defence?

24 A. That's correct, yes.

25 Q. And as far as you know that amount

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2 of Bitcoin remains the same as it was in 2011?

3 A. Yes.

4 Q. If it were to be spent you, as the
5 trustee, would have to be involved in the decision
6 to spend it; correct?

7 A. Absolutely.

8 MS. McGOVERN: Object to the form.

9 BY MR. BRENNER:

10 Q. You can answer.

11 A. Well, it would have to fulfil the
12 purpose of the trust and the rules of the trust
13 first of all. But, secondly, I believe if you
14 look on the block train it has not been spent.

15 Q. Right. I understand that I did not
16 mean to insinuate otherwise. You, as the trustee,
17 if you wanted to spend Bitcoin, you could only do
18 it consistent with the terms of the trust?

19 A. That is correct.

20 Q. And to date you have not done that;
21 correct?

22 A. That is correct.

23 Q. If a situation arose that was
24 consistent with the terms of the trust for the
25 expenditure of Bitcoin, how would you do that?

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2 MS. McGOVERN: Object to the form.
3 Calls for speculation.

4 BY MR. BRENNER:

5 Q. You can answer.

6 A. So, how would I spend it? So, the
7 purpose of the trust would be to, if we were
8 funding a company you mean, that was researching
9 Bitcoin; is that what you are saying?

10 Q. Sure.

11 A. Well, currently we cannot because
12 we don't have the full private keys to the trust.
13 But it does not actually mean that the trust -- it
14 is very hard to explain. So you don't have the
15 private keys to the Bitcoin but it doesn't mean
16 that you don't own that Bitcoin. I am not sure
17 you understand that.

18 Q. I think I do, but I will ask you
19 some questions to make sure that I am getting your
20 testimony the way that you want to give it?

21 A. Sure.

22 Q. You said currently you cannot spend
23 a Bitcoin "because we don't have the four private
24 keys". Did I get that right?

25 MR. SAOUL: Let me just clarify one

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2 thing, did you say "full private keys" or "four
3 private keys"?

4 A. No, it is not four, we don't have
5 the private keys necessary to -- we don't have the
6 private keys necessary to actually spent the
7 Bitcoin in that particular way. But I believe
8 that there are other ways. I'm not sure if it is
9 spending or they are assignments, I believe
10 legally there might be other ways to do it, but
11 I don't know how.

12 BY MR. BRENNER:

13 Q. Okay, so your counsel helpfully
14 made a correction on my understanding of what you
15 had testified to. Before, when you said, "We
16 currently don't have" -- I said you said four
17 private keys, you actually said ----

18 A. No I didn't, I said full --
19 F-U-L-L.

20 Q. That is what I was correcting for
21 the record. Your answer before was that, "We
22 currently cannot spend the Bitcoin because we
23 don't have full private keys" -- F-U-L-L.

24 A. But I do believe that there are
25 other ways that you can access the Bitcoin,

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2 providing that they are according to -- they
3 fulfil the trust purpose by legal means, but
4 I don't know how.

5 Q. You believe there are other ways
6 but you don't know how?

7 A. That is correct. I liken it to if
8 you have lost your car key and you cannot actually
9 drive to a certain place, but if you call roadside
10 assistance and say, "This is my car", you have to
11 show them some proof that it is your car.
12 Obviously you cannot just go into a parking lot
13 and say, "That great sporty Mercedes is my car".
14 If you show them some proof it was your car they
15 might be able to either cut you another key or get
16 you in, open the door for you.

17 Q. Okay. Other than you believing
18 there is a way to do it, you don't know how to
19 spend the Bitcoin in the trust correct?

20 A. I don't know how to do it.
21 I believe there is another way to do it, that is
22 correct.

23 Q. Okay. In your answer where we had
24 the -- or I had the confusion between "four" and
25 "full", you said, "Currently we don't have the

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2 full keys". When did that come to be? Was there
3 a time when you did have the full private keys to
4 the Bitcoin?

5 A. So it was never four keys, I said
6 "full", remember?

7 Q. Yes, I am trying to say "full" too.

8 A. Full. I am sorry. I have never
9 had the private keys, I just know that we don't
10 have the keys.

11 Q. So from the minute the trust was
12 formed, you, as a trustee, did not have the
13 ability to spend the Bitcoin; correct?

14 A. That is correct, yes.

15 THE EXAMINER: Is that a convenient
16 time to break off to you, Mr. Brenner, because
17 I know you are in the course of asking questions.

18 MR. BRENNER: Yes, can you give me
19 two or three minutes to tie this one section up?
20 Thank you.

21 THE EXAMINER: Yes.

22 MR. BRENNER: Thank you.

23 BY MR. BRENNER:

24 Q. You understood that there were --
25 one of the -- strike that. You understood that

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2 the primary purpose of the trust was to further
3 the research and work of Dr. Wright; correct?

4 A. Yes, correct.

5 Q. And in order to do that, as one of
6 the examples you gave, for example, the trust may
7 have wished or desired to make an investment in a
8 company or companies that were helping Dr. Wright
9 with that research; correct?

10 A. That is right, but in a legal
11 nature, so nothing that would -- for example, if
12 there was a company that wanted to start another
13 Silk Road, so you could anonymously buy drugs or,
14 you know, money laundering, none of those
15 anonymous things, so that would not work, yes.

16 Q. Right. I am assuming for the
17 purpose of my question it is a perfectly valid and
18 proper use of resources to further Dr. Wright's
19 work, okay?

20 A. Okay.

21 Q. One that is consistent with the
22 terms of the trust, okay?

23 A. Sure.

24 Q. The main, in fact the only assets
25 of the trust you have been able to identify are

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2 Bitcoin; correct?

3 A. No, I said that those were the only
4 ones that I knew of.

5 Q. Right, the only assets of the trust
6 that you, as the trustee, are aware of that you
7 had at your disposal were -- the only assets you
8 are of was Bitcoin; correct?

9 MS. McGOVERN: Object to the form.

10 A. I am sorry.

11 BY MR. BRENNER:

12 Q. You can answer.

13 A. There was IP involved as well, but
14 the IP was more Craig's work. So I don't know
15 what value that has. I did not know what monetary
16 value that IP has.

17 Q. Right, so that the thing in the
18 asset, the asset in the trust that you are aware
19 of that had monetary value was Bitcoin, correct?

20 A. His IP might have monetary value
21 but I don't know, I am not aware of it.

22 Q. Okay, and you could not further the
23 purpose of the trust by spending Bitcoin because
24 you did not know how to do it; correct?

25 A. I don't know -- I currently, no,

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2 I don't.

3 Q. You never knew how to do it?

4 A. No.

5 Q. Correct?

6 A. That is correct.

7 MR. BRENNER: Okay, let's take a
8 break. Thank you Examiner Green. Five or 10
9 minutes, is that good?

10 THE EXAMINER: Does that suit you
11 Miss Watts?

12 THE WITNESS: Yes.

13 THE EXAMINER: Thank you. Let us
14 say 10 minutes, everybody be back in 10 minutes,
15 because if I give five minutes not everybody will
16 be back. So make sure everybody is back in 10
17 minutes.

18 THE COURT REPORTER: We are going
19 off the record at 1.05 p.m.

20 (A short break off the record
21 from 1.05 to 1.14 p.m.)

22 THE COURT REPORTER: We are going
23 back on the record at 1.14 p.m.

24 BY MR. BRENNER:

25 Q. Okay, we are back again, Miss

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2 Watts. Let us pick up sort of where we left off,
3 okay?

4 A. Sure.

5 Q. In one of your answers you were
6 telling me about a company called HighSecured, do
7 you remember that?

8 A. I do.

9 Q. Is that -- it may be I am just
10 having difficulty hearing you -- the second word
11 of that company, is it "secure" or "secured"; is
12 there a "D" at the end?

13 A. Gosh, I think it is HighSecured.

14 Q. With a "D" at the end?

15 A. I believe so.

16 Q. And when were you -- strike that.
17 They were managing Tulip Trading, is that what you
18 said?

19 A. They were managing -- I don't know
20 if they were actually managing the company, but
21 I know that they were managing the Bitcoin in
22 Tulip Trading.

23 Q. Okay. The Bitcoin in Tulip Trading
24 was Bitcoin that had been purchased by whom, by
25 Tulip Trading?

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2 A. I believe so. I don't know because
3 I wasn't working for Tulip Trading. I don't know.

4 Q. Well, from 2011 when the trust was
5 formed, did it own the shares in Tulip Trading?

6 A. It would be about the same time,
7 I think so, definitely by 2012. I don't recall,
8 in terms of dates.

9 Q. So you were the trustee for the
10 trust that holds the shares in Tulip Trading by
11 2012; correct?

12 A. Yes.

13 Q. Do you know who was actually
14 managing Tulip Trading?

15 A. No, I am not a director, so
16 --I have only just become a director, I wasn't a
17 director then, so I don't know.

18 Q. Was Dr. Wright managing it?

19 A. I don't know.

20 Q. As the shareholder you had no
21 understanding who was managing the company you
22 owned?

23 MS. McGOVERN: Object to the form;
24 asked and answered.

25 BY MR. BRENNER:

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2 Q. You can answer.

3 A. Well, I mean, if I have shares in
4 Facebook I don't know exactly who is managing, it
5 or if I have shares in a few of other top listed
6 companies I don't know exactly who's managing it
7 either.

8 Q. Is Tulip Trading a listed company?
9 MS. McGOVERN: Object to the form;
10 argumentative.

11 BY MR. BRENNER:

12 Q. No, it is not. But go ahead.

13 A. I don't know. No, I don't believe
14 it was.

15 Q. Right. Tulip Trading was a closely
16 held company of Dr. Wright's, was it not?

17 A. I don't know.

18 Q. You don't know if your husband
19 owned or managed Tulip Trading?

20 A. My husband owned ----

21 MS. McGOVERN: Object to the form.

22 BY MR. BRENNER:

23 Q. Go ahead.

24 A. My husband owned several companies
25 so I don't know exactly what he owned. But if I

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2 had the corporate records in front of me I could
3 tell you. I believe you might have the corporate
4 records so if you looked at them I am sure they
5 would tell you that.

6 Q. Okay, so the answer is you don't
7 know whether your husband was running Tulip
8 Trading in 2012?

9 MS. McGOVERN: Object to the form;
10 asked and answered.

11 BY MR. BRENNER:

12 Q. You can answer.

13 A. The answer is he was running a lot
14 of companies and I don't know exactly which
15 companies he ran at which time.

16 Q. And you don't know whether he was
17 running Tulip Trading in 2012?

18 MS. McGOVERN: Same objection.

19 A. I guess I have the same answer. My
20 husband was running many comes at different times,
21 and now you are asking me whether I know if he was
22 running that particular company at that particular
23 time and I don't know.

24 BY MR. BRENNER:

25 Q. Do you know anyone else that ever

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2 ran Tulip Trading other than your husband?

3 MS. McGOVERN: Object to the form.

4 That is not what she testified to.

5 MR. BRENNER: It is a question,

6 I did not ask what she testified to.

7 Ms. McGovern, please just object to the form.

8 MS. McGOVERN: (Unclear).

9 MR. BRENNER: Excuse me, anything
10 beyond form is not acceptable. We do not have
11 time. You know the rules, you object to the form,
12 it preserves all form objections.

13 MS. McGOVERN: (Unclear).

14 MR. BRENNER: Please state to
15 objection to form or if you have a basis to
16 instruct the witness not to answer. Anything
17 beyond objection to form I will consider going
18 beyond the rules allowed by the court.

19 BY MR. BRENNER:

20 Q. Miss Watts, let me ask the question
21 again. Do you know anyone who ever ran Tulip
22 Trading other than your husband?

23 MS. McGOVERN: Object to the form.

24 You have to give me an opportunity to object.

25 Please don't rush this. There is a process. You

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2 made a beat, that was your word. I object to the
3 form of your question.

4 MR. BRENNER: Thank you.

5 BY MR. BRENNER:

6 Q. You can answer.

7 A. So Mr. Brenner, as I said before,
8 so I believe this was now nine years ago, I do not
9 recollect from nine years ago which company my
10 husband ran. He ran many, many, many companies at
11 different times. So, the answer to that question
12 is, I do not recall.

13 Q. My question must not -- let me try
14 to be clear. I am not talking about 2012, I am
15 talking first of all at any time did your husband
16 run Tulip Trading?

17 A. I do not recall.

18 Q. At any time do you recall anyone
19 who ran Tulip Trading?

20 A. I do not recall, but I know
21 HighSecured managed some of the assets in Tulip
22 Trading. Whether or not they ran it I don't know.

23 Q. Who at HighSecured were you working
24 with regarding Tulip Trading?

25 A. There would be e-mails I can't

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2 remember the names because this was many, many
3 years ago. I dealt with probably three different
4 lawyers and we had the Australian Tax Office in
5 the same room when I was e-mailing them back and
6 forth. I just don't remember the names.

7 Q. You don't remember any of the
8 names?

9 A. No.

10 Q. Okay. What years were you working
11 with HighSecured in connection with Tulip Trading?

12 A. Gosh, I really don't recall.
13 I think the last communication I had with them
14 would have been in 2014.

15 Q. Okay. And you think it started
16 some time -- well, it would not have started
17 before 2011; correct?

18 A. No, definitely not. I don't
19 remember, maybe in 2012, I really don't remember.
20 I know my last communication with them -- actually
21 I don't know if it was 2014 or 2015.

22 Q. Do you know where HighSecured was
23 located?

24 A. I believe they are a Panamanian law
25 firm.

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2 Q. Did you ever visit their law firm?

3 A. No.

4 Q. Did you ever meet in person with
5 anyone from HighSecured?

6 A. In person, no; on the phone, we
7 spoke on the phone; meeting, no.

8 Q. Just my -- perhaps my recollection
9 of technology is not precise, but did you ever
10 have a video meeting with them by phone, meaning
11 that you could see the person, or was it just
12 regular telephone?

13 A. Gosh, I have had so many Skype
14 meetings with people I do not recall. I might
15 have. There were three particular people that we
16 spoke to quite regularly. I don't remember.

17 Q. You don't remember their names;
18 correct?

19 A. No, but as I said the e-mails
20 should show you the names.

21 Q. Okay. You do you remember what any
22 of them looked like?

23 A. After all this time, probably not.
24 Skype is not actually very good by the way in
25 terms of -- yes.

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2 Q. How often would you say that you
3 were in contact with representatives of
4 HighSecured?

5 A. Oh, not that often. So they needed
6 to do some things for us in terms of we had a
7 super computer and they actually sort of brokered
8 the deal with a data centre, and I do not remember
9 the name of the data centre, where they paid the
10 data centre in Bitcoin, so that we had a super
11 computer to do our research.

12 Q. Okay. That was a transaction where
13 the payment was about 117,000 Bitcoin, does that
14 ring a bell?

15 A. I really don't remember. We had
16 our accounts look through that.

17 Q. Let me see if I can ----

18 MS. MCGOVERN: Then I can state my
19 objection for the record. I hate to be annoying,
20 but please let us use Mr. Brenner's metaphor for
21 using a beat beforehand. I object to the form of
22 the question.

23 BY MR. BRENNER:

24 Q. Was that payment made to Denariuz
25 PTE?

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2 A. I don't recall. I think our
3 accountants -- we had a financial controller at
4 that time, so they organised it.

5 Q. Was the accountant at a company
6 called 3ECPA?

7 A. I don't know.

8 Q. Was the accountant, and I don't
9 know if it is a man or a woman Kelly Ku?

10 A. I don't know.

11 Q. Why don't we take a look at a
12 document to see if maybe it will refresh your
13 recollection. Let us take a look at tab 26?

14 (Exhibit 3 was marked for identification)

15 Q. Miss Watts, did you get to tab 26?

16 A. Yes.

17 MR. BRENNER: By the way, for other
18 counsel, anyone, especially Miss McGovern, I am
19 going to assume you found it unless you tell me
20 otherwise. But I e-mailed this to you, so you
21 should have it.

22 MS. MCGOVERN: I did receive all of
23 the documents e-mailed, thank you so much,
24 Mr. Brenner, this is actually quite easy for me to
25 use, so I appreciate it.

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2 MR. BRENNER: Okay, so speak up if
3 you don't have it. I will make sure we wait a
4 second.

5 BY MR. BRENNER:

6 Q. So tab 26 appears to be, I guess it
7 is a 34 page document. Do you see that Miss
8 Watts?

9 A. Yes.

10 Q. We don't need to go through this in
11 great detail now, but if you look at the first
12 page, it is an e-mail from you to someone named
13 Kelly Ku and some other folks at a firm called
14 3ECPA?

15 A. Yes.

16 Q. It appears you were on a first name
17 basis with -- was Kelly Ku a man or a woman?

18 A. I actually don't know. I believe
19 Kelly would be a woman, but I don't know.

20 Q. We will call the person "Kelly".
21 It seems like you were on a first name basis with
22 Kelly and someone else named May, who I assume is
23 a woman; right?

24 A. Hmm hmm.

25 Q. May Uyen, do you see that?

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2 A. Yes.

3 Q. Do you recall those two
4 individuals?

5 A. May, not so much. Kelly, I think I
6 recall. I think this was an accounting firm.

7 Q. Right, and this is an accounting
8 firm that was, if you were to glance through the
9 document it has to do with trying to substantiate
10 a payment of Bitcoin that you were trying to
11 substantiate in connection with the Australian Tax
12 Office proceedings; is that right?

13 A. Do you know, I really don't recall.
14 I do not recall at all. I am reading this now and
15 I really don't remember this at all.

16 Q. Okay. If you go to that first
17 page, if you go down maybe toward the paragraph
18 that starts "in the letter"; do you see that?

19 A. Hmm hmm.

20 Q. It talks about a letter from --
21 that is Uyen Nguyen, is that correct?

22 A. Umm hmm.

23 Q. About Bitcoin being transferred to
24 coin in 2014?

25 A. Yes.

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2 Q. You recall that?

3 A. I do not recall this at all. This
4 was five years ago now, I am looking at the dates,
5 no I don't. We did a lot of e-mails to different
6 accounts, so I do not actually recall this.

7 Q. Okay, do you recall Bitcoin being
8 transferred out of the trust at any time?

9 A. Not to my knowledge.

10 Q. I thought you told me before that
11 Tulip Trading, for example, in this situation made
12 a Bitcoin payment in regard to a super computer?

13 A. Transferred out of Tulip Trading,
14 you mean?

15 Q. Yes.

16 A. Yes, out of Tulip Trading, yes, for
17 a super computer, yes.

18 Q. Okay, so you remember there were
19 times where Tulip Trading expended Bitcoin for
20 various purposes?

21 A. Yes.

22 Q. Would you, as the trustee of the
23 Tulip Trust, have been involved with that?

24 A. Yes.

25 Q. Would you have had to approve that?

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2 A. Yes, but I don't believe -- at that
3 time I don't know if I was the only trustee. So
4 if Denis Mayaka was a trustee as well he would
5 have had to approve it if I wasn't available.

6 Q. Okay then ----

7 A. Or even if a Craig was a trustee
8 then, but I don't know at that time whether he was
9 or not.

10 Q. You see the next paragraph that we
11 were just on, it says "Denariuz PTE LTD"?

12 A. Yes.

13 Q. It says -- it shows that that
14 company received 117,959.06 Bitcoin, do you see
15 that?

16 A. I see that it is written that, yes,
17 did it say it received it?

18 Q. It says that the documents from
19 that company show them receiving those same
20 amounts as capitalisation in the company of
21 Bitcoin, it is referring to the 117 right above
22 that. I am I reading that correctly?

23 MS. McGOVERN: Object to the form.

24 A. Okay, yes, that is what it says,
25 yes.

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2 BY MR. BRENNER:

3 Q. Was that the investment or purchase
4 of the super computer you were talking about?

5 A. No. So, I actually really don't
6 remember. But the super computer, so the super
7 computer was not actually with Denariuz, I don't
8 believe it was with that company. If you have --
9 as I said, I don't have the company documents with
10 me. A particular company would have been involved
11 with that, but I do not think it was Denariuz,
12 I don't know. If I had the company records in
13 front of me I would have been able to tell you
14 which company was involved in the super computer.
15 But the fact is the Bitcoin would have been moved
16 from Tulip Trading and paid to a separate company
17 in Panama, I believe, who was actually managing
18 the data centre, so the Bitcoin wouldn't have been
19 moved into a company.

20 Q. Where would it have been moved to?

21 A. Well, Bitcoin would have been paid
22 -- the Bitcoin would have been used to pay the
23 data centre to run the super computers.

24 Q. Right, and you don't know who that
25 data centre was?

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2 A. No, I don't. There is an agreement
3 somewhere in some of the company records it
4 actually tells you where the -- I believe it might
5 tell you where the data centre was, or the name of
6 it.

7 Q. Okay. Let me ask you -- if you go
8 to tab -- the very next tab, tab 27?

9 (Exhibit 4 was marked for identification)

10 Q. Miss Watts, do you have that in
11 front of you?

12 A. I do, yes.

13 Q. Great, thank you. At least on my
14 copy, if everything is working smoothly, which it
15 has so far, it is a four page document; do you see
16 that?

17 A. Yes.

18 Q. It is -- I am going to focus on the
19 first page. I think, but we will confirm it as we
20 go through, that the next three pages are the
21 attachments or the annexures to the letter, okay?

22 A. Yes.

23 Q. Do you see that?

24 A. I do.

25 Q. This is a letter from Dr. Wright;

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2 do you see that?

3 MS. McGOVERN: Object to the form.

4 There is no authentication of this letter,

5 Mr. Brenner.

6 BY MR. BRENNER:

7 Q. Let us do this way. Do you see
8 this letter?

9 A. I see the letter, yes.

10 Q. Do you see the signature on that
11 letter?

12 A. Barely.

13 Q. Okay. Do you recognise that as
14 your husband's signature?

15 A. Not really, because I can barely
16 see it.

17 Q. Okay, so it is not that you are not
18 saying it is and you are not saying it isn't, you
19 just have trouble seeing it because of the quality
20 of the copy?

21 A. Yes, I have trouble seeing it.

22 MS. McGOVERN: Object to the form.

23 Object to the form of the prior question.

24 BY MR. BRENNER:

25 Q. If you look at the upper right-hand

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2 corner of the letter, do you see that?

3 A. I do.

4 Q. It has your husband's name;
5 correct?

6 A. It does.

7 Q. It has an address; correct?

8 A. It does.

9 Q. And what is that address?

10 A. That address corresponds to the
11 home address that we had at that time, that is
12 where we were living.

13 Q. And Gordon NSW, is that an
14 Australian address?

15 A. Yes.

16 Q. NSW is New South Wales?

17 A. That is correct.

18 Q. Was that a business address or home
19 address?

20 A. It was a home address.

21 Q. Okay, that was your marital home?

22 A. That is correct.

23 Q. And you said "at that time", I take
24 it you have moved out of that home; correct?

25 A. In June 2014?

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2 Q. No, some time after June 2014?

3 A. Yes, I mean we are now in England.

4 Q. Sure. That home, you were living
5 there in June of 2014 though?

6 A. I believe so, yes.

7 Q. And your husband was too?

8 A. Yes.

9 Q. Was that the last home that you
10 lived in, in Australia?

11 A. Yes, I believe so, yes.

12 Q. Okay. So when you left that home
13 did you move to the UK?

14 A. That is correct.

15 Q. When did that happen?

16 A. December 2015.

17 Q. Through approximately the end of
18 2015 you were living in Australia; correct?

19 A. That is correct.

20 Q. As was your husband; correct?

21 A. Yes -- well, he was here I think --
22 I think he was in the UK in October and he came
23 back.

24 Q. He came to the UK shortly before
25 you?

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2 A. Yes, then he sort of travelled back
3 and forth a little bit, but he was based here.

4 Q. Okay, so through the end of 2015
5 you stayed in Australia with the kids?

6 A. That's correct.

7 Q. And then you reunited as a family
8 end of 2015, beginning of 2016?

9 A. That's right.

10 Q. When you left the home in December
11 2015, this is the -- I will call it the St. Johns
12 Avenue home, okay?

13 A. Hmm hmm.

14 Q. When you left that home, did you
15 sell the home?

16 A. No, we were renting.

17 MR. SAOUL: Can I ask, Mr. Brenner,
18 where you see the relevance of these questions and
19 how they fit into the categories you are permitted
20 to ask questions about?

21 MR. BRENNER: Sure, and
22 I appreciate that. What I want you to understand
23 is that the defendant is taking the position
24 regarding certain documents that they are
25 forgeries or hacks. In particular the defendant

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2 yesterday took the position that -- you know what,
3 I do not want to do this in front of the witness.
4 If you want to have the witness step out I am
5 happy to do it.

6 MR. SAOUL: If you could identify
7 for me which category within the English court
8 order your questions fall under I am prepared to
9 -- I am not asking you for some detailed
10 explanation of the justification for your question
11 in the wider litigation. My concern is the
12 English court order. I just at the moment do not
13 understand how the question that you just asked
14 falls within the categories which you are, as a
15 matter of English law, permitted to ask questions
16 about. If you disagree then just identify for me
17 which bit of the order. Otherwise it may be that
18 it does not stem out of this order we should just
19 move on.

20 MR. BRENNER: Well, we cannot move
21 on. I will tell you that it goes to statements by
22 Dr. Wright, which would include both written and
23 oral statements. This is one such statement, or
24 at least it purports to be. I am trying to
25 ascertain, as you heard Ms. McGovern object, I am

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2 trying to ascertain the authenticity of the
3 statement.

4 MR. SAOUL: So just help me, I do
5 not want to take up too much of your time,
6 Mr. Brenner, statements made by Mr. Wright about
7 what? Because you drafted the form of words, or
8 your legal team drafted the form of words that now
9 finds itself in the English order, you have
10 identified the topics in category (b), which is
11 the relevant category here, so statements about
12 what?

13 MR. BRENNER: This one happens to
14 be statements specifically about the trust and the
15 Bitcoin, which are the centrepiece of everything
16 she is here to testify about.

17 MR. SAOUL: Okay. Perhaps you can
18 ask your question and we can understand how it
19 concerns the trusts or Bitcoin.

20 MR. BRENNER: I think if you read
21 it, it says trust and Bitcoin.

22 MR. SAOUL: I agree.

23 MR. BRENNER: Okay, look,
24 I understand you have got to do your job. I am
25 happy for you to do your job. When I said I would

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2 try to finish by 7, its was based on no
3 unnecessary delays. You and I are not going to
4 agree on this. You have got to make a decision of
5 what you want to do. This goes to the absolute
6 core of her testimony in the case. So I don't
7 mean to rush you, but this is exactly the type of
8 thing that is going to make us not finish. We
9 cannot spend 15 minutes debating each other.

10 MR. SAOUL: Mr. Brenner, I have
11 been very careful not to interrupt you more than
12 necessary.

13 MR. BRENNER: I agree.

14 MR. SAOUL: The fact that I am
15 being polite should not be misunderstood as a lack
16 of conviction or firmness on the position here.
17 Okay?

18 MR. BRENNER: Yes.

19 MR. SAOUL: Right. I am going to
20 allow the witness to answer, but I expect the
21 questioning quickly to return to the topics that
22 we are expecting them to cover.

23 MR. BRENNER: Okay. I do not
24 mistake anything you are doing for lack of
25 firmness. I fully trust that you are honestly and

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2 faithfully trying to discharge your duties as
3 counsel to Miss Watts, and nothing I say should
4 indicate otherwise. But all I am trying to do is
5 say that at some point we are going to each have
6 to make our own calls, because otherwise we are
7 going to spend too much time debating things.
8 Okay?

9 MR. SAOUL: Agreed.

10 BY MR. BRENNER:

11 Q. So where I was, Miss Watts -- I am
12 sorry, I am just going to get the screen back
13 up -- I was trying to understand from you is what
14 happened to the home after you left it. Okay.
15 What you said before we took a slight hiatus was
16 that you were renting; is that right?

17 A. Yes, that is correct.

18 Q. So you were a renter in this home?

19 A. That is correct.

20 Q. When you left what did you do with
21 your stuff? Did you clean out the home?

22 A. Yes, because we were moving to the
23 UK.

24 Q. Right. Did you bring that stuff
25 with you to the UK?

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2 A. The things that were in the house?

3 Q. Yes?

4 A. Yes.

5 Q. Did you bring computers with you to
6 the UK?

7 A. The work computers, no, they were
8 in the work office, because we still had the
9 office running at that time and we still had staff
10 as well.

11 Q. Perfect. This will help your
12 counsel's, I think objection, which is -- I am
13 only interested in the work stuff, I am not trying
14 to figure out what you did with the pictures of
15 your children and things that are of sentimental
16 or personal importance to you. I have no interest
17 to that, I am not going to enquire about that,
18 okay?

19 A. Sure.

20 Q. To the extent there were work
21 things in the home, concerning your work with
22 Dr. Wright, you took those with you to London;
23 correct?

24 A. Well, they were not really work
25 things in the home, because everything was on the

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2 server.

3 Q. Perfect. So, the server was where?

4 A. In the office in Sydney.

5 Q. Okay, and when you left, I think
6 you mentioned this already, but when you left
7 Australia at the end of 2015 you still maintained
8 the office in Sydney; correct?

9 A. That is correct. Well, we did not
10 maintain it, but the office staff maintained it.

11 Q. Okay, folks that worked for you?

12 A. Yes.

13 Q. And how long did that remain the
14 case, how long did that office stay up and
15 running?

16 A. I don't recall. It might have been
17 six months perhaps.

18 Q. And then what happened to that,
19 what happened to the office?

20 A. It was closed down.

21 Q. Then -- so there were obviously
22 work things at the office; correct?

23 A. That is correct.

24 Q. What happened with the -- for
25 example with the server; what happened with the

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2 server when you shut down the office in Australia?

3 A. I do not know, I don't know what
4 the system administrator did. I actually really
5 don't know.

6 Q. Okay. When you had moved to the
7 UK, you and Dr. Wright had moved to the UK and the
8 business was still running, or the office was
9 still running in Australia, did you have a
10 connection to the server in the UK?

11 A. I don't know. I am not very
12 technical, I really do not know.

13 Q. Okay, you picked an interesting
14 spouse to not be very technical, but that is
15 normally things how these work.

16 A. I know.

17 MS. McGOVERN: I am going to object
18 to the statement and to the form of that comment
19 on the record, just strike it.

20 MR. BRENNER: Okay, you can strike
21 it. My joke was obviously very offensive to you.
22 It was meant to be humorous, Miss Watts, it was
23 not a ----

24 A. I understand.

25 Q. I know you do, but Ms. McGovern did

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2 not. Let us go back to the letter.

3 MS. McGOVERN: Can you refrain from
4 making those kinds of statements on the record, it
5 is unnecessary.

6 MR. BRENNER: Thank you Ma'am.

7 BY MR. BRENNER:

8 Q. Let's go to the letter. The letter
9 is from June 2014; correct?

10 A. That is what it says here.

11 Q. Okay. And it purports to be from
12 Dr. Wright to Miss Uyen; correct?

13 A. I don't know. I really don't know.
14 We had quite a few problems in 2014, we had our
15 computers hacked, our personal computers at home
16 and the computers in the office. So quite
17 frankly, there are lots of e-mails back and forth,
18 even to me, even from me, that were not mine. We
19 discovered that in 2014/2015 I think.

20 Q. This letter -- and I understand
21 your testimony regarding what you just said --
22 this letter, if you look at the second page, which
23 is titled "annexure 1"?

24 A. Yes.

25 Q. The first thing it says is, it

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2 says: "Software deal MJF Mining Services WA PTY
3 LTD"?

4 A. I do.

5 Q. It does it say that Bitcoin and the
6 amount of 358,852.45 was transferred to MJF Mining
7 Services?

8 MS. McGOVERN: Object to the form.

9 A. I actually really don't know what
10 it says. I didn't write it.

11 BY MR. BRENNER:

12 Q. Regardless of what it says, are you
13 aware of Bitcoin ever being transferred to MJF
14 Mining Services by Tulip Trading?

15 A. I don't know if it was Tulip
16 Trading but Craig did tell me that he was trying
17 to buy, I think it was gold, from somewhere called
18 Mark Ferrier.

19 Q. That is, the MJF initials is Mark
20 Ferrier; correct?

21 A. I presume so.

22 Q. The second is "IAAS deal agreement
23 with Signia/HighSecured." Do you see that?

24 A. I do.

25 Q. Is that the data centre that you

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2 were referring to in your earlier answers?

3 A. So, HighSecured is not a data
4 centre. HighSecured is a law firm.

5 Q. I understand.

6 A. So I don't think it says the data
7 centre, but I believe that the deal I talked
8 about, in regards to the data centre, I think it
9 was the IAAS deal, but I cannot remember.

10 Q. And does it sound about right that
11 111,000 Bitcoin was transferred to IAAS by Tulip
12 Trading?

13 A. I really have no idea, I don't
14 know.

15 Q. The last one says "loan repayment"
16 do you see that?

17 A. I see that.

18 Q. It says 117,956.06?

19 A. I see the numbers.

20 Q. Right, if you -- do you know what
21 that loan repayment was; do you know what that is?

22 A. I have no idea.

23 Q. Do you believe what I have shown
24 you as exhibit 4, I believe, is hacked document?

25 MS. McGOVERN: Objection ----

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2 BY MR. BRENNER:

3 Q. You don't know?

4 THE COURT REPORTER: I am sorry,
5 you cut out. Is "an accurate document"?

6 MR. BRENNER: "Hacked".

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

9 BY MR. BRENNER:

10 Q. You can answer.

11 A. I really don't know.

12 Q. Okay.

13 A. As I said, I have reason to doubt
14 many documents because we were hacked so -- and
15 I didn't write this one, so I really don't know.

16 Q. Okay. So, let me go back to the
17 trust formation, 2011. Do you know if there was a
18 trust document drawn up at that time?

19 A. Yes.

20 Q. Was there?

21 A. Yes, definitely.

22 Q. Okay. And did that -- that named
23 you as a trustee; correct?

24 A. Yes.

25 Q. Did it also name Dave Kleiman as a

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2 trustee?

3 A. No, Dave Kleiman was never a
4 trustee.

5 Q. Okay. For any of the Tulip trusts?

6 A. No, never.

7 Q. Did Dave -- Dave Kleiman, when
8 I say Dave -- I will try to say Dave Kleiman --
9 did Dave Kleiman hold any keys to any of the
10 Bitcoin?

11 A. To the Bitcoin, no. He held keys
12 but they weren't to Bitcoin.

13 Q. What were the keys to?

14 A. So he held key slices that were
15 associated with a -- it is quite complicated. So
16 these are cryptographic keys, I believe, they are
17 key slices to a key. And this key would actually
18 open electronic files, so I know that Craig had
19 tasked Dave with sort of these key slices to be
20 returned to him, but the key slices were opening
21 electronic files and in the files there were
22 I think Craig's notes, algorithms, formula, that
23 sort of stuff.

24 Q. So Dave's keys were not to unlock
25 any Bitcoin?

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2 A. No.

3 Q. Correct?

4 A. Correct, Dave's keys were not to
5 unlock Bitcoin, no.

6 Q. Did your husband have -- putting
7 aside Bitcoin, did he have money in trusts?

8 A. I don't think so.

9 Q. Okay. Let us go to tab number 35.
10 I think that is the last tab.

11 THE EXAMINER: That will be exhibit
12 5.

13 (Exhibit 5 was marked for identification)

14 BY MR. BRENNER:

15 Q. Miss Watts, do you have that in
16 front of you?

17 A. I do.

18 Q. That is a one page document, do you
19 see that?

20 A. I do.

21 Q. I do not have a Bates stamp on
22 that. I am going to represent to you that,
23 through your counsel, you produced to us 23
24 documents on Monday, I think, do you recall that;
25 you are aware of that?

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2 A. I am aware that my counsel had
3 access to my e-mails, yes. I don't know whether
4 they ----

5 Q. Okay. This one was in the
6 documents I have given to you. Actually it was
7 Watts 1, the first document.

8 A. Okay.

9 Q. I am just doing that for the
10 record, it did not print with a Bates stamp. I am
11 not sure why it is. Maybe there was not one put
12 on. Okay? So this is -- first of all, is this an
13 e-mail that you -- or a copy of an e-mail that you
14 wrote on or about May 28, 2012?

15 A. Frankly, it was eight years ago,
16 I am looking at the date. I don't recall the
17 exact writing of it. But I am reading it now and
18 I recall the content definitely. I don't recall
19 writing it then, but I recall having a huge fight
20 with Craig in 2012 about this exact topic.

21 Q. Okay, so tell me what the fight was
22 about?

23 A. I didn't understand what he was
24 trying to do.

25 Q. What didn't you understand?

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2 A. So in 2012 I was working two jobs,
3 we didn't have a lot of money, he was working day
4 and night and it was financially very difficult
5 for us. I had no idea really what Bitcoin was all
6 about. We discussed the trust, he said, you know,
7 "This is my life's work, we're going to have --
8 make sure there are certain rules to this trust so
9 that the Bitcoin can only be spent for certain
10 things". In 2012 here I am not being able to put
11 decent food on the table for my kids and I'm,
12 saying, you know, "If there's Bitcoin why can't we
13 just spend it?"

14 Q. Okay. So in 2011 you were already
15 the trustee for Tulip Trust, which is holding
16 shares in the company called Wright International,
17 which has a substantial amount of Bitcoin; is that
18 fair?

19 A. Yes, it is fair, but you have to
20 understand that in 2011 I really didn't understand
21 what Bitcoin was. He said to me it was some sort
22 of digital cash, and it was his thing and he said
23 this is, you know, something that we will be using
24 in the future to fund other companies, to promote
25 Bitcoin, to make it legal again because it was use

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2 used for nefarious purposes in 2011. But in 2012,
3 as I said, things were getting pretty desperate
4 and I said, "Whatever it is in there, you know,
5 you are telling me you cannot touch it, it's
6 ridiculous, so give me some sort of explanation".

7 Q. Let's go to the actual e-mail,
8 okay?

9 A. Yes.

10 Q. I am going to focus on, I guess it
11 is technically the third paragraph that starts
12 with the word "So"?

13 A. Yes.

14 Q. Your understanding, when wrote this
15 e-mail, was that there was a lot of money in the
16 trust and that Dave holds "keys" and others do as
17 well; correct?

18 A. But my understanding was wrong,
19 that is the thing. So I didn't actually
20 understand. So I was just spewing out whatever
21 I felt at that time. I was very angry.

22 Q. Okay. At this point you thought
23 your husband had money in a trust; correct?

24 A. No, I don't know what I thought, to
25 be honest with you, I really don't know what

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2 I thought. I just didn't understand. I don't
3 know if you have ever been in a fight with your
4 wife, but your wife I am sure will have said
5 things that she doesn't mean and doesn't
6 understand, and that is exactly what this is
7 about. He set me straight though, we had many,
8 many conversations after this, many more fights.

9 Q. Okay, and how did he set you
10 straight?

11 A. Well, he explained exactly what was
12 going on.

13 Q. And he explained that ----

14 A. Okay, so he ----

15 Q. Go ahead.

16 A. He explained that the keys that
17 Dave had were actually keys to -- there were key
18 slices to another key. And if you had all the key
19 slices together then you would have this one key,
20 this key, that would be able to unlock an
21 electronic file. I believe there were several of
22 these, so there would be several electronic files.
23 He said in these electronic files, there was his
24 notes, all his notes, that he had written about
25 Bitcoin. So the start of Bitcoin, how it started,

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2 why, the purpose behind it. It had formula and
3 algorithms. The formula and algorithms would
4 allow him to then calculate the private keys to
5 the Bitcoin that was in Wright International.

6 Q. At Wright International ----

7 A. Basically what he was saying was
8 that he didn't have access to it because he didn't
9 have the private keys, because he and Dave had had
10 an understanding where Dave had the keys to the
11 electronic file, and so Craig didn't have the
12 formula to calculate the keys for the Bitcoin.
13 Then he said, "And even if I did, I couldn't do
14 anything about it because it doesn't fit the
15 purpose of the trust".

16 Q. Okay. At the time you wrote -- by
17 the way, this is an e-mail you found in your
18 computer; is that right, recently?

19 A. Well, I didn't find it. My lawyers
20 did.

21 Q. Okay. But it comes from your own
22 device; correct?

23 A. I believe so.

24 Q. At the time, in May 2012, what --
25 were you a director of business services at

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2 Panoptocrypt?

3 A. I believe I was.

4 Q. What was Panoptocrypt?

5 A. Panoptocrypt was a cyber security
6 company, a forensics company. So Dave was doing
7 -- not Dave -- Craig was doing work on forensics,
8 I am not sure exactly what he was working on, but
9 we didn't have a lot of money coming in from
10 Panoptocrypt at that time. There was scada(?) and
11 forensics that he was doing. I don't remember
12 what else though.

13 Q. Was Dave working with Panoptocrypt?

14 A. No, I do not think so, no.

15 Q. Do you have any reason to dispute
16 that this is an authentic e-mail that you wrote on
17 about May 28, 2012?

18 A. I don't know. As I said, I don't
19 recall writing this e-mail. I recall the content
20 of it very much though and I recall the time,
21 because I remember that in about 2012, mid-2012
22 Craig and I had several very, very big fights over
23 this exact thing.

24 Q. Okay. Let's talk about Dave

25 Kleiman. Did you ever meet Dave Kleiman?

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2 A. Not in person, no.

3 Q. Did you ever speak with Dave
4 Kleiman?

5 A. Yes, I did.

6 Q. Was that by telephone or by some
7 sort of video connection, or both?

8 A. I think mostly Skype. I don't know
9 if it was Skype, but yes, a video connection.

10 Q. In your mind you recall what he
11 looked like?

12 A. Yes.

13 Q. Okay. Dave Kleiman was a close
14 friend of your husband's?

15 A. Yes, he was his best friend.

16 Q. Was he a partner of your husband's?

17 A. In terms of work? No.

18 Q. Was it is your testimony that they
19 did -- strike that. Did they work together?

20 A. I think so, yes. I mean, Dave
21 edited a lot of Craig's papers, I think they wrote
22 a book together. Yes, I think they did. They
23 must have, they wrote a book together. I think
24 they wrote several books together, but I can't
25 remember.

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2 Q. So when you answered my question
3 that they were not partners in a work sense, what
4 did you mean?

5 MS. McGOVERN: Object to the form.

6 A. Well, I suppose it depends on what
7 a partner means. They could have been. I mean,
8 I just said to someone the other day, "Do you want
9 to partner up and go to Costco and buy toilet
10 paper and split it up between us?" It depends how
11 you use the word.

12 MR. SAOUL: I am going to make an
13 objection from an English perspective, Mr.
14 Brenner, which is that you asked her if they were
15 work partners. So I think the question is what
16 did you mean by that expression, which the witness
17 was adopting.

18 MR. BRENNER: Okay. I am not sure
19 that that is right, but I will clean it up. No
20 problem.

21 BY MR. BRENNER:

22 Q. The work that your husband and
23 Mr. Kleiman did together was not really analogous
24 with going to Costco and buying toilet paper, is
25 it?

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2 MS. McGOVERN: Object to the form.

3 A. No, but I am saying I use that word
4 very loosely.

5 BY MR. BRENNER:

6 Q. Okay, fair enough.

7 A. I use the word "partner" very
8 loosely.

9 Q. They did work together on matters
10 related to Bitcoin; correct?

11 A. I don't think that the book that
12 they wrote together had anything to do with
13 Bitcoin. I think it was more a forensic one, but
14 I am not sure.

15 Q. Go ahead. That is not my question,
16 not asking about the book. My question is,
17 and I will try to be clear, your husband and Dave
18 did work together on matters relating to Bitcoin?

19 A. I don't know. Can you be more
20 specific?

21 Q. No, I cannot.

22 A. Well, then, I cannot answer that
23 question.

24 MS. McGOVERN: I object to the form
25 of the question.

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2 BY MR. BRENNER:

3 Q. Did your husband write the Bitcoin
4 white paper?

5 A. Yes, he did.

6 Q. Did Dave help him with that?

7 A. No, he didn't.

8 Q. How do you know that?

9 A. Craig told me. When I met him in
10 2010 he said, "I've written something, I have
11 created something, I've done something". Plus
12 I have had many conversations with Dave.

13 Q. Maybe my word "work" is bad. Do
14 you know if Dave helped edit the Bitcoin white
15 paper?

16 A. I don't know if he edited it, no,
17 I don't know.

18 Q. You say you had conversations with
19 Dave about that issue. What were the those
20 conversations?

21 A. About which specific issue?

22 Q. Well, I asked you how did you know
23 that Dave did not work with your husband on
24 Bitcoin, and you said one of the reasons is that
25 you had conversations with Dave. What were those

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2 conversations?

3 A. He said things to me like, "Your
4 husbands is brilliant, what he's come up with,
5 he's brilliant", that sort of stuff.

6 Q. Anything else?

7 A. Yes, "Look after him, take care of
8 him, he's a" -- beep beep beep. He said some
9 nasty things about him, but in a very joking
10 manner, absolutely.

11 Q. Sure. Did he ever said to you that
12 he had no involvement in Bitcoin; did Dave ever
13 say that?

14 A. That would be a very strange thing
15 to say to me, "Hi Ramona, I have no involvement in
16 Bitcoin".

17 Q. I agree.

18 A. That would be a very strange thing
19 to say to me. No.

20 Q. I agree it would be strange. That
21 is why I am asking you if you are saying he said
22 that?

23 MS. McGOVERN: Object to the form.

24 A. I never said that he said that the
25 all.

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2 BY MR. BRENNER:

3 Q. Okay.

4 A. I said that he said to me, "Ramona
5 look after Craig, he's brilliant, if you see what
6 he's done he is brilliant. He is a pain in the
7 arse, but you need to look after him".

8 Q. Go back to, I think last exhibit we
9 were on, I think it was exhibit 5. Did Craig ever
10 explain to you why Dave was asked to hold the key
11 slices you testified about?

12 A. Which one am I looking at, sorry,
13 exhibit 5?

14 Q. It is the first tab, yes, sure the
15 first tab ----

16 MR. SAOUL: The last tab, tab 35.

17 MR. BRENNER: No -- yes, you are
18 right, tab 35. Yes, my bad.

19 A. That e-mail?

20 BY MR. BRENNER:

21 Q. Yes, on the top of my notebook.

22 A. Yes, sorry what was your question?

23 Q. It would be great if I could
24 remember it. My question was, did Craig ever tell
25 you why Dave was asked to hold key slices related

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2 to the trust?

3 A. The key slices were not related to
4 a trust at all. The key slices were related to
5 electronic files that has Craig's notes in it. It
6 had nothing to do with the trust.

7 Q. Okay. So the key slices only were
8 to files that included Craig's notes?

9 A. Yes.

10 Q. And did those notes have anything
11 to do with the ability to access Bitcoin?

12 A. So, those notes were the beginnings
13 of Bitcoin and how he had written it and why he
14 had written it and all his research, and in those
15 notes there were formulas and algorithms on how
16 you calculate private keys.

17 Q. Right, but in those notes was the
18 ability to -- was it in those notes the private
19 keys to the Bitcoin that had been mined that was
20 now part of Wright International?

21 MS. McGOVERN: I am going to object
22 to the form of the question.

23 BY MR. BRENNER:

24 Q. You can answer.

25 A. So those notes had nothing to do

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2 with private keys. Those notes were all his notes
3 on how he created Bitcoin and all the research and
4 all the formula and algorithms.

5 Q. So the key slices or key slice
6 which Dave held one of actually had nothing to do
7 with private keys to Bitcoin; correct?

8 MS. McGOVERN: I object to the form
9 of the question. That is not the testimony that
10 has been given.

11 MR. BRENNER: Ms. McGovern, please.
12 The words are "object to the form". Anything more
13 is unacceptable.

14 MS. McGOVERN: You are misstating
15 the record.

16 MR. BRENNER: Ms. McGovern, that is
17 unacceptable. The objection is to the form and
18 you know better.

19 MS. McGOVERN: Mr. Brenner, I am
20 objecting to this form of questioning.

21 MR. BRENNER: That is the end,
22 thank you. Your objection is noted.

23 BY MR. BRENNER:

24 Q. Miss Watts, subject to that
25 objection, the notes -- Craig's notes that Dave

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2 held a key slice, or one of the key slices to,
3 those notes had nothing to do with the private
4 keys to the Bitcoin that was being held by Wright
5 International. Is that not correct?

6 MS. McGOVERN: Object to the form.

7 A. So, Mr. Brenner, I really don't
8 know because I didn't write those notes and he
9 wrote them before I met him. So I couldn't answer
10 that question.

11 BY MR. BRENNER:

12 Q. Are those notes still in an
13 encrypted file?

14 A. Yes.

15 Q. The encrypted file that you helped
16 your husband unlock recently, through the help of
17 Mr. Mayaka, were those the notes that Dave held
18 the key slice to?

19 MS. McGOVERN: Object to the form.

20 A. So I did not unlock anything with
21 Craig. We were sent things from Denis Mayaka.

22 BY MR. BRENNER:

23 Q. The encrypted file that Dave held a
24 key slice to, it is your testimony that it is
25 still encrypted?

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2 A. Yes, and I am not sure if it is one
3 file or several files, to be honest with you,
4 I actually really don't know. I think there are
5 several encrypted files. Dave doesn't, or didn't
6 hold one key Dave held several keys, and he was
7 supposed to be sending them back in 2020.

8 Q. Supposed to be sending them back
9 via a bonded courier; correct?

10 A. I do not know how he was supposed
11 to send them back.

12 Q. And regardless of how he was
13 supposed to send them back, that still has not
14 happened; correct?

15 A. We have received some things, I do
16 not know what they are though. We sent them to
17 the lawyers, but I don't think we received
18 everything.

19 Q. What did you receive?

20 A. Funny strings of numbers. I don't
21 know what it was.

22 Q. Who from?

23 A. I don't know, from a very strange
24 e-mail, a very strange e-mail. Not anyone I knew.

25 Q. When was that?

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2 A. Perhaps in January.

3 Q. You received an e-mail in January
4 with very strange numbers?

5 A. Hmm hmm.

6 Q. Did use turn those over to your
7 lawyers?

8 A. Yes, right away.

9 Q. How many e-mails did you receive,
10 with strange numbers?

11 A. I think only one.

12 Q. You did not know the person who it
13 was from, was there someone identified as the
14 sender?

15 A. It was not a name, I don't think,
16 no, it was some strange made up thing, no.

17 Q. Do you recall what it was?

18 A. No, I don't but my lawyers have it,
19 the US lawyers will have it.

20 Q. Okay.

21 MR. BRENNER: Has that been turned
22 or to us, Ms. McGovern?

23 MS. MCGOVERN: Yes it has,
24 Mr. Brenner. Those were the anonymous e-mails
25 that were sent to you last year.

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2 BY MR. BRENNER:

3 Q. Okay, so Miss Watts, you just told
4 me you received things in January; correct?

5 A. I said I don't remember.

6 Q. Okay.

7 A. I said I don't remember when
8 I received them. I received lots of e-mails, I do
9 not know when I received them.

10 Q. So it may have been as far back as
11 last June, is that your testimony?

12 A. No, I don't think so.

13 Q. Right, it was this year, wasn't it,
14 ma'am?

15 A. I don't remember. It could have
16 been December, it could have been January. It
17 would not have been so far back in June,
18 definitely not.

19 Q. Okay.

20 MS. McGOVERN: I did just pose an
21 objection to the last question or rather
22 statement. If it was a question that was made,
23 Mr. Brenner, I would like to make it clear on the
24 record, so there is no confusion here, that
25 anything that has been received with respect to

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2 testimony about anonymous receipt of information
3 related to strange numbers, was produced to
4 plaintiffs upon receipt.

5 MR. BRENNER: Okay.

6 BY MR. BRENNER:

7 Q. Miss Watts, how many times would
8 you estimate -- I know it is hard, but I am just
9 trying to get a general sense -- did you speak
10 with Dave Kleiman?

11 A. I don't -- I really couldn't
12 estimate, I don't know. I, mean, he was often
13 talking to Craig on Skype and I would walk in on a
14 regular basis. So I couldn't put a number to it.

15 Q. Okay. How often do you think your
16 husband was speaking to Dave Kleiman?

17 A. I don't know.

18 Q. Is it fair to say that they spoke
19 about work sometimes?

20 A. I wasn't always in the room when
21 they spoke. A lot of times they were just
22 talking, just general "how are you doing", sort of
23 conversations. A lot of times Craig was very
24 frustrated with him, I know that, there was a lot
25 of raised voices.

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2 Q. Were there some times when they
3 were talking about work, or you do not recall any
4 time they were talking about work?

5 A. I don't know, I wasn't a actually
6 listening to the conversations.

7 Q. Were there times when you yourself
8 had conversations with Mr. Kleiman that your
9 husband was not part of?

10 A. Yes, if Craig walked out of the
11 room.

12 Q. And what would you guys talk about?

13 A. Mostly about Craig. Mostly Dave
14 would be saying, you know, "I know he's difficult
15 but you just have to hang in there because what
16 he's doing is pretty amazing and pretty remarkable
17 and you really need to support him". He was a
18 really good listener.

19 Q. Dave was?

20 A. Yes.

21 Q. Okay. Did you ever talk to Dave
22 about the Tulip Trust?

23 A. No.

24 Q. Did you ever talk to Dave about the
25 Bitcoin that was mined by Wright International?

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2 A. No.

3 Q. Did you ever talk to Dave about
4 Bitcoin that was purchased by Tulip Trading?

5 A. No.

6 Q. Let's take our break. I am about
7 to change subject.

8 THE EXAMINER: So maybe we should
9 have a break for five minutes or so, if that suits
10 you.

11 THE WITNESS: Sure.

12 MR. BRENNER: If I could just --
13 one other thing. Can you let me know when you
14 guys are going to want to take the little more
15 extended break for lunch?

16 THE WITNESS: I'm okay, I don't
17 need it. It is up to you guys. I don't mind.

18 MR. SAOUL: After the next one,
19 3 o'clock?

20 MR. BRENNER: After the next hour?

21 MR. SAOUL: Yes.

22 MR. BRENNER: Okay, whatever you
23 guys want is fine with me.

24 THE EXAMINER: I think it will be
25 your lunch and soon be our tea.

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2 MR. BRENNER: Yes, okay.

3 THE EXAMINER: So let's go off the
4 record and have a five minute break.

5 THE COURT REPORTER: We are going
6 off the record at 2.10 p.m.

7 (A short break off the record
8 from 2.10 p.m. to 2.17 p.m.)

9 THE COURT REPORTER: We are back on
10 the record. It is 2.17 p.m.

11 BY MR. BRENNER:

12 Q. Miss Watts, let me tie up a couple
13 of loose ends from where we were, and then we will
14 switch topics in a little bit, okay?

15 A. Sure.

16 Q. I had asked you if you could
17 estimate for the amount of times you had spoken to
18 Mr. Kleiman and you told me it was a long time ago
19 and you really couldn't give me an estimate; is
20 that fair?

21 A. Yes, I don't remember now many
22 times. As I said, I walked in and out a lot when
23 they were chatting.

24 Q. That is what I was going to say.
25 It happened rather frequently that you would walk

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2 in and your husband would be talking to
3 Mr. Kleiman; correct?

4 A. There were times, I don't know how
5 many times, I don't know if it was frequent, but
6 they were chatting, yes.

7 Q. Okay. Was that over the course of
8 -- let me ask you this, and again I don't mean to
9 pry, but I am just trying to ascertain what you
10 know. You were married in 2013, right?

11 A. Yes.

12 Q. And I am just trying to figure out
13 where you were. Were you living with Dr. Wright
14 before that?

15 A. Yes.

16 Q. Okay, when did that start?

17 A. 2011.

18 Q. So from the period of 2011 -- and
19 you understood that Mr. Kleiman died in 2013;
20 correct?

21 A. Yes.

22 Q. So for that two year period there
23 were times where you walked in and you husbands
24 was talking to Mr. Kleiman; correct?

25 A. Yes.

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2 Q. There were times when your husband
3 would be talking to Mr. Kleiman and he would walk
4 out and you would just talk to Mr. Kleiman;
5 correct?

6 A. That is correct.

7 Q. Were there ever times where you
8 initiated the contact yourself to Mr. Kleiman?

9 A. No.

10 Q. Were there times when Mr. Kleiman
11 initiated the contact to you?

12 A. No.

13 Q. Okay. So your conversations were
14 either as part of a conversation with you and your
15 husband and Mr. Kleiman, or times when your
16 husband stepped out and you would have the
17 conversation?

18 A. Yes, he was my husband's best
19 friend. I had no reason to just call him.

20 Q. Sure. We went through that 2017 --
21 I guess I will call them the 2017 trust document,
22 I think we called it before; do you recall that?

23 A. Yes.

24 Q. And in that document it listed some
25 beneficiaries; do you recall that?

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2 A. Yes.

3 Q. Were those the beneficiaries of the
4 trust when it started in 2011?

5 A. They were the intended
6 beneficiaries. I think in 2011 -- I do not
7 remember the wording, it might have just said a
8 family.

9 Q. Okay. Was there anyone outside of
10 yours and Dr. Wright's family that was ever a
11 trustee of the Tulip Trust?

12 A. Trustee?

13 MS. McGOVERN: Object to the form.

14 BY MR. BRENNER:

15 Q. Yes, bad question. I mis-spoke.
16 Was there anyone outside the family that was ever
17 a beneficiary of Tulip Trust in 2011?

18 A. No, never.

19 Q. And you think sometimes it named
20 people by name and other times you just talked
21 about family or children and things like that?

22 A. Yes.

23 Q. And does that remain true today?

24 A. Yes.

25 Q. Okay, we talked about this a little

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2 bit, but let me -- you know, let me ask you one
3 other question. You have referred to, on a few
4 occasions you used the term "my US counsel"; do
5 you recall that?

6 A. That is correct.

7 Q. Okay, who is your US counsel?

8 A. Amanda.

9 Q. It is your understanding that
10 Ms. McGovern is representing you; is that correct?

11 A. Yes.

12 Q. And has that been the case since
13 this lawsuit was filed?

14 A. No, I have my British counsel here
15 as well, with me, in this room.

16 Q. Right. It was a bad question. Not
17 to the exclusion of your British counsel.

18 I understand they have and are representing you.

19 But has Ms. McGovern and her law firm been
20 representing you since the beginning of this
21 litigation?

22 A. I don't think her law firm --
23 I don't know the legal ramifications of all that
24 sort of thing. I think it is just her. I don't
25 know.

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2 Q. And your understanding is, since
3 the beginning of this litigation, Ms. McGovern has
4 been representing you?

5 A. I don't think it is since the
6 beginning of the litigation. It is possibly since
7 I was served.

8 Q. Since you were served with a
9 deposition notice?

10 A. I believe so.

11 Q. Before that, were you represented
12 by US counsel?

13 A. No, because there was nothing to
14 represent me for.

15 Q. If you could go to tab 34, are you
16 there?

17 A. Yes.

18 Q. If our system is working you are
19 looking at something that looks like a filing in a
20 court case?

21 A. Yes.

22 Q. Is that right?

23 A. Yes.

24 Q. It should be a four page document;
25 do you see that?

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2 A. Yes.

3 Q. Can we mark that as the next
4 exhibit.

5 (Exhibit 6 was marked for identification)

6 Q. I will represent to you that there
7 is actually a fifth page, which was a page that
8 had your husband's signature on it, but because of
9 the issues regarding the coronavirus at the time
10 that he signed it, it was able to be formally
11 affirmed or -- we call it notarised here. But
12 there is no other substantive information on that
13 page, okay?

14 A. Hmm hmm.

15 Q. Have you seen this document before?

16 A. No, never.

17 Q. I want to make sure I understand
18 this document as it relates to you because it
19 talks about you?

20 A. Yes.

21 Q. Okay. If you will look at where it
22 says interrogatory number 2, do you see that on
23 the first page?

24 A. Yes.

25 Q. Just so you understand what that

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2 is, in the American court system the parties,
3 through their counsel, are able to issue each
4 other written questions. We call them
5 interrogatories, okay?

6 A. Okay.

7 Q. And then the court rules the
8 parties require to, subject to legal objections,
9 to answer those questions under oath, okay?

10 A. Yes.

11 Q. And this happens to be a
12 supplemental response. What I mean by that is it
13 is a second response to this interrogatory that
14 your husband swore to, and was served to us by
15 Ms. McGovern, okay?

16 A. Hmm hmm.

17 Q. I am going to go to interrogatory
18 number 2, the response, but if you could just read
19 interrogatory number 2 to yourself, so you will
20 understand what was being asked and the answer may
21 make a little more sense? Just let me know when
22 you are ready. (Pause for reading)

23 A. Okay, I have just read
24 interrogatory number 2.

25 Q. My question was a bad one, but I am

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2 glad you did it. You read both the interrogatory
3 and the response, right?

4 A. I am sorry, yes, sorry.

5 Q. No, you did great. You read them
6 both, right?

7 A. I didn't read the interrogatory,
8 I read the response. Now I am going to read the
9 interrogatory, sorry. Okay, I have read that.

10 Q. Great. It is fair to say that the
11 significant part of this interrogatory talks about
12 things that you either were asked to do, or did do
13 or said; correct?

14 A. Yes.

15 MS. McGOVERN: Object to the form.
16 I object to the form of the last question.

17 BY MR. BRENNER:

18 Q. Miss Watts, having now had an
19 opportunity to read the interrogatory itself and
20 the response, let me just ask you first, is that
21 an accurate description of the events that
22 transpired and are described in that interrogatory
23 response as you understand them?

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

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2 A. This is how it happened ----

3 Q. Okay.

4 A. -- in my view.

5 BY MR. BRENNER:

6 Q. Okay, good. So let's go through it
7 so I can understand it, okay?

8 A. Yes.

9 Q. I am starting at the -- I am going
10 to page 2, and I am just going to walk you through
11 it, okay?

12 A. Okay.

13 Q. I am starting on page 2 where it
14 says, "The production"?

15 A. Where it says what, sorry?

16 Q. "The production to plaintiffs"?

17 A. Okay.

18 Q. So it says: "The production to
19 plaintiffs of the Trust Agreement in the list of
20 public addresses ordered to be produced by
21 Magistrate Reinhart occurred as a result of me
22 requesting my wife, Ramona Ang May Fong (Ramona)
23 to obtain documents associated with the trust and
24 the company, Wright International Investments Ltd,
25 company number 064409." Do you see that?

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2 A. I do.

3 Q. Do you understand that the capital
4 "T" -- Trust capital "A" -- Agreement referred to
5 in that sentence is what we have been calling the
6 2017 trust agreement?

7 A. Yes.

8 Q. Which has been previously marked as
9 an exhibit to this deposition?

10 A. Yes.

11 Q. Did you understand -- strike that.
12 What exactly did Dr. Wright request that you do,
13 as referenced in that interrogatory?

14 A. Oh, so, I actually don't remember
15 him actually saying, "Send this to me". So
16 I don't recall the conversation like that at all.
17 So, it says here -- "to obtain documents" -- what
18 I recall, from my recollection, is that we had
19 actually discussed it, in December some time, that
20 we were going to get access to the trusts in 2020
21 and we knew that any of the trust document anyway
22 because we locked it up for that long, and in
23 December I was going to request it from Denis.

24 Q. Okay. So let us unpack that a
25 little bit. You and your husband had a

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2 conversation regarding the trust in December 2019?

3 A. Yes, I don't know when in December,
4 but yes, we did.

5 Q. Sure that con -- tell me again
6 because you actually broke up a little bit on the
7 video for me.

8 A. Yes.

9 Q. Tell me again what precipitated or
10 what caused that conversation?

11 A. I don't recall, I don't recall what
12 caused it.

13 Q. Okay, I will tell you what I heard.
14 But it did break up so maybe that will jog your
15 memory a bit.

16 A. Sure.

17 Q. What I thought you said is because
18 -- you had that conversation because you were --
19 or "we were about to get access to the trust in
20 2020"?

21 A. The trust document, yes. So when
22 we locked it up we said that we would be having a
23 meeting in, I think, I don't know, December or
24 January. By January anyway we had said that that
25 is what we were going to do. So if I were to have

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2 access to it in January I thought I'd better ask
3 Denis in December, because I wasn't sure how long
4 it would take for him to get back to me.

5 Q. When you say "it", when you had
6 access to it, what is the it you are talking
7 about?

8 A. The document, the trust document.

9 Q. So to make sure I understand, the
10 trust document we have been talking about, the
11 2017 trust document, you can refer to it if you
12 want, but it is a document you signed in 2017;
13 correct?

14 A. I don't recall.

15 Q. Let's look at that and make sure
16 I am not wrong.

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

19 BY MR. BRENNER:

20 Q. Let me get the document. It is
21 tab ---

22 THE EXAMINER: 33 is that a help to
23 you?

24 MR. BRENNER: No, because I think
25 it is tab 26 -- you are right, it is tab 33.

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2 Thank you.

3 THE EXAMINER: It is exhibit 2 for
4 the record.

5 BY MR. BRENNER:

6 Q. Thank you. Miss Watts, if you
7 could go back to tab 33 in exhibit 2?

8 A. Yes.

9 Q. I was incorrect, so let's go to
10 page 14 of the document. There are two signatures
11 on the document; correct?

12 A. Yes.

13 Q. One -- do you recognise that as
14 your husband's signature, Dr. Craig Wright?

15 A. It looks like his signature.

16 Q. Did you witness him sign this
17 document?

18 A. No, I didn't.

19 Q. The second signature lists -- it
20 says trustee, Denis Bosire Mayaka; correct?

21 A. That is what it says, yes.

22 Q. You understand that actually you
23 are the trustee; right?

24 A. We were both trustees.

25 Q. Okay, well let's look at that,

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2 because we had that come up before. Let's go to
3 page 5 of the document. Do you see that?

4 A. Hmm hmm.

5 Q. I am going to the middle of the
6 page where it says: "Trustee and successor
7 trustee."

8 A. Umm hmm.

9 Q. Can you read into the record who is
10 identified as the trustee of the document, can you
11 read that first sentence?

12 A. "The trustee of the trust shall be
13 Ramona Ang."

14 Q. Okay. You were the trustee,
15 weren't you ma'am?

16 A. Yes, but so was Denis.

17 Q. Let's look at that. Denis comes up
18 about a third of the way through that paragraph,
19 or two thirds; correct? Do you see in bold
20 letters?

21 A. Yes, he is a successor trustee,
22 that is still a trustee though.

23 Q. Well, it actually says if Ramona
24 Ang -- is Ramona Ang you, by the way?

25 A. It is, but why don't you turn to

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2 page 1 of it. It says there ----

3 Q. Okay, I will?

4 A. -- it says there, "Denis Mayaka,
5 trustee of the Tulip Trust".

6 Q. Okay, first let's do what I was
7 doing and then I will go to your page, I promise
8 you, okay.

9 A. Sure.

10 Q. It says: "If Ramona Ang is not
11 able to serve in the intermediate period before
12 2020 for any reason Denis Bosire Mayaka will act
13 as caretaker trustee without the ability to
14 dispose of assets..." And it goes -- it describes
15 what he would do. Do you see that?

16 A. I do.

17 MS. McGOVERN: I make objection to
18 the record that when Miss Watts is speaking and
19 she might state something, that she should be able
20 to speak and complete her sentence without
21 interruption by you.

22 MR. BRENNER: Okay, I have told her
23 to let me know if that happens. She seems more
24 than capable of doing that, and she has able
25 counsel with her. I have not cut off Miss Watts.

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2 MS. McGOVERN: (Unclear).

3 MR. BRENNER: In fact -- excuse me
4 -- I have not cut her off, but she knows and I
5 will repeat it, if I do, or her counsel there
6 believes I do, then they will let me know.

7 MS. McGOVERN: Okay.

8 BY MR. BRENNER:

9 Q. So let's go back to -- you wanted
10 to go to page 1 of the document, which is page
11 number 1 but it is actually the second page;
12 right?

13 A. Yes, it just says page number 1
14 though.

15 Q. It says -- and tell me what you
16 want me -- you want me to ----

17 A. So the third bullet point, you see
18 that it says, "Denis Bosire Mayaka trustee of the
19 Tulip Trust."

20 Q. Okay, so is it your understanding
21 that Mr. Mayaka and you were both trustees of the
22 Tulip Trust?

23 A. That that is my understanding, yes.

24 Q. And when I say, this is in 2017 at
25 or about the time it is executed, right?

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2 A. Yes, I think I would be the main
3 trustee and he would be the secondary trustee, but
4 he is still a trustee, yes.

5 Q. Just so I understand your
6 testimony, you did not sign this document;
7 correct?

8 A. I did not, no.

9 Q. Is it your testimony -- there is a
10 provision in here, and I just cannot find it
11 quickly -- but there is a provision which states
12 that your husband was not allowed to have a copy
13 of the document, I think it is before some time in
14 December 2019; does that sound right to you?

15 A. That is correct, yes.

16 Q. There is no such provision that
17 says that you as the trustee cannot have a copy of
18 the document; correct?

19 A. That is correct.

20 Q. Okay. Did you have a copy of this
21 document?

22 A. No.

23 Q. Why not?

24 A. Because my lawyer had it.

25 Q. Did you have access to it?

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2 A. I could have requested it.

3 Q. At any time, right?

4 A. Yes.

5 Q. In fact, if you wanted to know
6 whether something you were doing or not doing was
7 consistent with the terms of the trust, you would
8 have reviewed the document; correct?

9 A. I didn't need to though, because we
10 weren't doing anything at that time.

11 Q. Okay. So it is your testimony that
12 you don't have a -- your lawyer is holding a copy
13 of the trust agreement, but you don't have it --
14 is it your testimony that you don't have it until
15 December 2019?

16 A. That is correct.

17 Q. So let us go back to the
18 interrogatories that we were on. (Unclear) off
19 onto this tangent. So you and your husband are
20 having a conversation in December 2019, and is it
21 your testimony that you decided at that time with
22 him to request a copy of the trust document?

23 A. I don't actually recall what
24 happened. I just know that I requested it from
25 Denis. I don't know whether or not it was a joint

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2 decision or whether I made that decision on my
3 own. I don't remember that.

4 Q. Let me ask you this. Was that
5 decision in any way related to anything that your
6 husband had been ordered to do by the court in
7 Florida?

8 A. It might have been for him, but
9 certainly not for me. I wasn't ordered to do
10 anything. I knew what I had to do before January
11 2020.

12 Q. You recall that your husband came
13 down to Florida to participate in court hearings
14 in June and August 2019; do you recall that?

15 A. I know he went to Florida some
16 time, I cannot remember the dates.

17 Q. Do you remember he testified in
18 court?

19 MS. McGOVERN: I am going to object
20 to the line of questioning, that it may spousal
21 privilege regarding litigation against Dr. Wright.
22 They are married, this is potentially invading a
23 spousal privilege regarding litigation and issues
24 in the litigation that would be intended to be
25 confidential between husband and wife. To the

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2 extent that the questions put Miss Watts in the
3 position of potentially testifying against her
4 husband, I am going to invoke the suppose
5 privilege. Again, I do not want to do that. If
6 you could rephrase your question so you do not
7 invade any suppose privilege, then we can take it
8 question by question.

9 MR. BRENNER: Okay, the question on
10 table is, which you are instructing her not to
11 answer is, were you aware that your husband
12 testified in Florida in 2019. You are instructing
13 her not to answer that question?

14 MS. McGOVERN: I am.

15 MR. BRENNER: That is my question.
16 Just instruct her. I am not going to debate it
17 with you, I disagree with you, but if you want to
18 instruct her, do it.

19 MS. McGOVERN: I have the right to
20 speak without you dictating what I say.

21 MR. BRENNER: I am just pointing
22 for the record again, this is the type of thing
23 that is going to take us time. So we will do what
24 we can do. Go ahead.

25 MS. McGOVERN: Let me know when you

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2 are done.

3 MR. BRENNER: I am done.

4 MS. McGOVERN: Mr. Brenner, I did
5 not instruct Miss Watts not to answer. I simply
6 said, to the extent because you are going quickly
7 and I am not able to object as I wish over these
8 video conferences, I want to make sure there is no
9 invasion of the spousal privilege for litigation
10 while they are married. So let us take it
11 question by question. Miss Watts, please give me
12 an opportunity to inject my objection to make sure
13 that the privilege is not invaded. I am not
14 instructing you not to answer that question.

15 BY MR. BRENNER:

16 Q. Were you aware that your husband
17 testified in Florida in the summer of 2019?

18 A. I was aware that he was in America
19 for some court proceedings, I don't remember
20 exactly when, I don't know if he was testifying,
21 I know he had to go for a court proceeding.

22 Q. At any time prior to December 2019,
23 okay, did your husband ask you to, as he puts in
24 this interrogatory, obtain documents associated
25 with the 2017 trust?

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2 A. I don't have a specific
3 recollection of him actually saying to me, "Can
4 you please give me"-- what was this, the exact
5 document. I do not have a specific recollection
6 of that.

7 Q. Do you have a general recollection
8 of him ever asking you to obtain the 2017 trust
9 prior to December 2019?

10 A. I don't have a specific
11 recollection of that. I have a recollection of us
12 discussing the fact, as I mentioned to you before,
13 that the trust was -- not the trust, it was more
14 the trust document -- was going to be available in
15 2020, and that we had to have a trust meeting
16 between I think December and January, I cannot
17 remember the dates. That is when I said that I
18 would be getting that information from Denis.

19 Q. Right. The only time you remember
20 your husband asking you anything about getting the
21 2017 trust document was this conversation you told
22 me about some time in December 2019?

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

25 BY MR. BRENNER:

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2 Q. You can answer, ma'am.

3 A. What was the question again?

4 Q. Sure. The only time you have a
5 recollection of your husband asking you to obtain
6 the 2017 Tulip Trust document is in the
7 conversation you told me about that took place in
8 December 2019?

9 MS. McGOVERN: Same objection.

10 A. Well, I don't actually have a
11 recollection of him actually saying, "Please can
12 you get me a trust document".

13 BY MR. BRENNER:

14 Q. So when he wrote writes in his
15 interrogatory that he, "Requested my wife, Ramona,
16 to obtain documents associated with the trust",
17 you don't recall that happening?

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

20 A. I recall agreeing with him that I
21 would be getting documents for the trust.

22 BY MR. BRENNER:

23 Q. And that was in December of 2019?

24 A. Yes, it would have been.

25 Q. Never before, correct?

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2 A. No, not before.

3 Q. Then -- by the way, I think you
4 answered this before, but you could have requested
5 this document from Denis Mayaka, the 2017 trust
6 document at any time; correct?

7 A. But I had no reason to.

8 Q. Not my question. My question is
9 you could have requested that document at any time
10 you wanted to if you decided you had a reason to?

11 A. Sure, yes.

12 Q. And the only reason you decided to
13 do it in December of 2019 is because you
14 understood that things associated with the trust
15 were going to happen in 2020?

16 A. Yes, plus the discussion that we
17 had about that, yes.

18 Q. Plus the discussion you had. What
19 does that mean?

20 A. In that we had to have the
21 meetings, we had to have meetings between --
22 I believe it was December and January, I don't
23 remember the dates, but I know that we had set out
24 terms that said we had to have meetings, sometime
25 I think before the end of January. I don't

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2 remember the dates.

3 Q. Could you go back to the Tulip
4 Trust document, the 2017 document?

5 A. Yes.

6 Q. Since you now have referred to the
7 meeting, let me make sure we are on the same page.
8 If you go to -- again we are using the page
9 numbers, if you go to page 18, do you see that?

10 A. I do.

11 Q. Schedule D?

12 A. Yes.

13 Q. It refers to a video recording of a
14 meeting; do you see that?

15 A. I do see what is written.

16 Q. Is that the meeting -- was there a
17 meeting among the -- has there ever been a meeting
18 between the beneficiaries and members discussing
19 the rights, obligations and interpretations
20 regarding the trust agreement?

21 A. Yes, we had a meeting in December.

22 Q. Was that meeting videotaped?

23 A. Sorry?

24 Q. It appears to me when I look at
25 this, that meeting was supposed to be videotaped.

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2 Was it videotaped?

3 A. It wasn't videotaped.

4 Q. Okay, and that meeting took place
5 before or after you requested the trust document
6 from Mr. Mayaka?

7 A. After.

8 Q. So let's go back to the
9 interrogatory answer. You -- it says you made a
10 request to the director of this company, Denis
11 Mayaka, do you see that?

12 A. What line are we on?

13 Q. Sure, that is bad of me. I am
14 still in the paragraph that says "the production".

15 A. Yes, okay.

16 Q. So I am sort of picking up where we
17 left off. I am starting with the sentence that
18 says, "The shares of this company"?

19 A. Okay.

20 Q. It says: "The shares of this
21 company are held by the trust" -- what that is
22 referring to is the shares of Wright International
23 Investments were held by the trust; is that
24 correct?

25 MS. McGOVERN: Mr. Brenner, I am

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2 going to object to the extent that you are asking
3 Miss Watts to interpret an interrogatory answer
4 written by somebody else.

5 MR. BRENNER: I am going to object
6 to anything more than object to the form. In all
7 honesty, if you do it again I am a going to try to
8 get the court online. There is no basis for you
9 to make that objection. You can object to the
10 form, it preserves every single objection you
11 have.

12 MS. McGOVERN: You can ring the
13 court on the phone any time you like. I object to
14 what you are doing here. Objection (unclear).

15 MR. BRENNER: If you object to what
16 I am doing how about try this, "objection". Then
17 you will have an objection.

18 BY MR. BRENNER:

19 Q. Miss Watts, the shares of this
20 company are held by the trust, do you see that?

21 A. Yes.

22 Q. That is a reference to what you
23 told me before, the shares of Wright International
24 Investments were held by the trust; correct?

25 A. So what I told you, the shares of

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2 Wright International, yes, the trust holds shares
3 in Wright International.

4 Q. Right. The next line, now this is
5 directly about you, so I am just trying to give
6 context to it. It says: "Ramona made a request
7 to the director of this company, Denis Mayaka, in
8 December 2019." Do you see that?

9 A. I see what it is written, yes.

10 Q. Okay, it is true that you made a
11 request to Mr. Mayaka; correct?

12 A. I did.

13 Q. Is it true that Mr. Mayaka is a
14 director of Wright International Investments?

15 A. I don't know.

16 Q. Okay, so you don't know whether
17 that statement is true or false; correct?

18 A. I do not know. That is right.

19 Q. Now, he says specifically, now
20 Dr. Wright has specifically testified about what
21 he asked you to do; do you see that?

22 A. I do.

23 Q. "I asked my wife, who is the
24 primary trustee of the trust, to obtain a copy of
25 the trust agreement." Is that true?

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2 A. It could have been. As I said,
3 I don't have a specific recollection.

4 Q. He also asked you, according to
5 this, to obtain the associated records, including
6 the company accounts that related to the entities
7 owned by the trust?

8 A. That one I specifically remember
9 because he actually did say to me when we got --
10 so we got the trust document in December, I think
11 it was, and he said it was not the full documents,
12 he said that there should be other company
13 documents as well. And I couldn't remember what
14 Denis had and what he didn't have. So I asked him
15 again, I don't know if it was the end of December
16 or early January, to give us the company
17 documents. I remember that conversation.

18 Q. Okay, so you asked Mr. Mayaka for
19 the trust document; correct?

20 A. So I asked him or the for the trust
21 document -- again, I don't remember the dates, but
22 I am sure it was in December. Yes. Then I asked
23 him for all the documents, so including company
24 records and everything else in, I think it was
25 January.

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2 Q. Okay. He gave you the trust
3 documents, you already testified to that; correct?

4 A. He did.

5 Q. Did he give you these related
6 company documents that are referred to here?

7 A. At a later stage, he did, yes.

8 Q. Did you turn those over to US
9 counsel?

10 A. Yes.

11 Q. I am going to now go to the next
12 paragraph, because it is saying something you
13 specifically said -- I shouldn't say specifically,
14 there is no quotation mark, it is talking about
15 you. Do you see that?

16 A. "My wife requested the trust
17 agreement" that one?

18 Q. No, next paragraph?

19 A. Okay.

20 Q. Before looking at that paragraph
21 let me ask you a question. Did you understand
22 that there was dispute in the lawsuit regarding
23 the public addresses to certain Bitcoin?

24 A. No.

25 Q. Okay. Here it says: "Ramona told

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2 me that the list of public addresses which was
3 ordered to be produced by Judge Reinhart did not
4 arrive with the trust agreement." You did not
5 know that there was a list of public addresses
6 that was being ordered by Judge Reinhart, did you?

7 MS. McGOVERN: Object to the
8 form -- let me object to the form of the question.

9 MR. SAOUL: I am also going to make
10 an objection, which is, I am not the dependent in
11 this interrogatory, but it does seem to me that
12 the reading that is being put on that sentence is
13 not sustained by the words.

14 MR. BRENNER: Okay let's try it
15 again then, because I am trying to read it
16 honestly and to understand it. If you are having
17 a confusion, I will take that in good faith and I
18 will try to clean it up.

19 BY MR. BRENNER:

20 Q. Okay. He says: "Ramona told me
21 that the list of public addresses" -- when you got
22 the trust document did you discuss with Dr. Wright
23 anything about public addresses?

24 A. No, I just gave him the trust
25 document and I said, "This is what we are going to

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2 be giving to the lawyers".

3 Q. So you did not tell him that the
4 list of public addresses did not arrive; correct?

5 A. No, but he asked me whether
6 anything else, was there anything else with the
7 trust document, was there anything, and I said no,
8 it was just the trust document.

9 Q. Okay. Did he ask you specifically
10 if there were public addresses?

11 A. He asked me if there was anything
12 else. He said, "Did you get anything else?"
13 I said it was only the trust document. I guess he
14 knows that trust document does not have a list of
15 public addresses.

16 Q. It says -- so, basically, you gave
17 -- when you got the trust document did you give it
18 to him, to Dr. Wright?

19 A. I did give it to him.

20 Q. Just so I understand the
21 conversation, he asked if there was anything else;
22 correct?

23 A. Yes.

24 Q. And you said no?

25 A. Yes.

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2 Q. And then the next paragraph is
3 supposedly what happens next -- the next sentence,
4 so let's look at that, okay?

5 A. Sure.

6 Q. "After my wife received the trust
7 agreement and gave it to me to give to my
8 attorneys I asked my wife to request additional
9 documents held by the trust and the companies
10 owned by the trust including Wright International
11 Investments." Is that true?

12 A. So he asked me to ask Denis for all
13 the other documents.

14 Q. Okay, and what did you ask him?

15 A. I just said, "Give me everything
16 that is associated with any of the company
17 records, just give us everything that you have".

18 Q. When you say the company, you are
19 referring to Wright International?

20 A. Yes.

21 Q. So you asked Denis that; correct?

22 A. Yes.

23 Q. And was this all happening by
24 e-mail, by telephone, or so some other way?

25 A. So there is then encrypted -- it is

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2 like Snapchat, I think it is called Vistomail. It
3 is like Snapchat, where you actually send someone
4 a message and they send it back to you.

5 Q. Okay. Have you ever met Denis
6 Mayaka?

7 A. No, I have had Skype conversations
8 with him, phone conversations.

9 Q. What does he look like?

10 A. I don't remember. More phone
11 conversations. I have had more phone
12 conversations than Skype conversations.

13 Q. What colour is his skin?

14 A. He is dark.

15 Q. Then it says -- I am just reading
16 further in the sense, because it is talking about
17 you, okay: "Ramona received those documents
18 through a Vistomail account in an encrypted file."
19 Do you see that?

20 A. Yes.

21 Q. Is that true?

22 A. Well, I received it. I do not know
23 if it was an encrypted file. As I said, I am not
24 very technical, so I received something.

25 Q. Were you able to open whatever you

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2 received?

3 A. I gave it to Craig.

4 Q. Okay, so you received a file
5 through a Vistomail exchange from Denis Mayaka --
6 let me take it back, since that is not entirely
7 correct. Whatever you received by Vistomail, did
8 it come from Denis Mayaka?

9 A. Yes.

10 Q. Okay. Then did you just -- you
11 said you gave it to Craig. It seems to me it is
12 something electronic. How did you give it to him?

13 A. Well, I said, "This is what
14 I received".

15 Q. Okay, so you showed him the -- I am
16 going to call it an e-mail, is that correct; is
17 Vistomail an e-mail?

18 A. I don't know, I don't know what it
19 is. I think it is like a Snapchat but I am not
20 exactly sure. I think they are e-mail functions,
21 but I don't really know.

22 Q. I am going to call it a Vistomail
23 message, just so we can refer to it as something,
24 okay?

25 A. Sure.

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2 Q. You got the Vistomail message from
3 Mr. Mayaka, this is still in December 2019?

4 A. I think this one was now in
5 January, because this was the second ----

6 Q. The second go around?

7 A. Yes.

8 Q. Whether it is December or January
9 not going to hold you to it, it is in this general
10 time frame?

11 A. Yes.

12 Q. Then when you got it did you
13 forwards the Vistomail message to Craig or
14 Dr. Wright, or did you ----

15 A. No, I just let him have a look at
16 it. But Denis also sent me something on my
17 e-mail, but I think it was through his Vistomail
18 account, so he sent the same thing, so he must
19 have sent it twice.

20 Q. He sent it once to your e-mail and
21 once through Vistomail?

22 A. Yes.

23 Q. The "it" was an encrypted file, or
24 a file, you do not know if it was encrypted or
25 not; correct?

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2 A. The one on Vistomail was encrypted,
3 the one on machine e-mail was not.

4 Q. Were you able to open it?

5 A. Yes.

6 Q. And what was it?

7 A. It was corporate records, it was
8 just all the documents, company documents.

9 Q. Was there a list of other addresses
10 to e-mail -- sorry, strike that -- was there a
11 list of public addresses to Bitcoin in the file
12 you received from Denis Mayaka?

13 A. I don't know. I just -- I looked
14 at a lot of things, there were lots of
15 spreadsheets, there were a lot of things.

16 Q. Whatever you received from
17 Mr. Mayaka, did you give to Dr. Wright?

18 A. That one I am not sure if I sent it
19 directly to the US lawyers or I forwarded it to
20 Dr. Wright. I am not sure. I cannot remember.

21 Q. I am going to scroll down a little
22 bit because I want to get to the parts that are
23 about you, okay?

24 A. Sure.

25 Q. So we will go to the next

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2 paragraph, this is "The files received"?

3 A. Okay.

4 Q. It says: "The files received by
5 Ramona as trustee" -- is this referring to the
6 files you received from Mr. Mayaka?

7 A. I don't know what he's referring
8 to.

9 Q. Okay. If you go to the next
10 sentence it says: "Ramona showed these files and
11 other associated files to me but retained the
12 files."

13 A. Umm hmm.

14 Q. Do you see that?

15 A. Yes.

16 Q. Is it true that Dr. Wright -- well,
17 did you give the files to Dr. Wright?

18 A. Well, I let him look at it, as
19 I said to you, in the Vistomail, I let him look at
20 it. I don't think there is a function where you
21 can forward on Vistomail, but I do not really know
22 how Vistomail works, to be honest with you.

23 Q. Okay. If you could go now to the
24 next page, the paragraph starts with "Ramona".

25 A. Umm hmm.

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2 Q. It says: "Ramona has witnessed my
3 receipt of the trust agreement and the file
4 containing the Bitcoin public addresses." Do you
5 see that?

6 A. Umm hmm.

7 Q. Did you witness Dr. Wright's
8 receipt of the file containing the public
9 addresses?

10 A. Well, I received files. I don't
11 know what they were. So if there were public
12 addresses in them then he would have had them.

13 Q. The truth is you don't know if
14 those files contained the public addresses?

15 A. Mr. Brenner, do you know that my
16 husband has Asperger's and struggles a great deal
17 actually to express himself and to interpret
18 himself? I have troubles with him at all the
19 time, I have fights with him all the time. In the
20 ten years that we have been together we used to
21 fight every day initially ----

22 Q. Okay.

23 A. -- because he has an inability to
24 express himself simply and succinctly. So,
25 sometimes when he writes things and sometimes when

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2 he says things, it is not what we perceive it to
3 be, it is how he perceives it to be. He is
4 literal beyond anything. So if he thinks that I
5 -- if he thinks that I knew something, just
6 because he knew something, he would say that
7 exactly in this sort of case. We had so many
8 troubles. When he was supposed to pick a child
9 and he didn't pick the child up because of certain
10 things that he said. You are asking me to
11 interpret what he said. I wasn't even a party to
12 this. I have never read this before. I am just
13 telling you the truth of what I have seen and what
14 I have heard, but what I have seen and what I have
15 sent or what I have not sent, he really struggles
16 with expressing himself correctly. I think that
17 is probably why he gets into so many problems,
18 with me primarily, but everyone else. He
19 struggles with looking at you in the eye when he
20 talks to you. It has taken me ten years, and I
21 live with him -- it has taken me ten years for him
22 to look me in the eye when he talks to me.

23 Q. My question only is this -- nothing
24 to do with Dr. Wright, I am asking only about you,
25 Miss Watts. You do not know whether the files you

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2 received from Mr. Mayaka contain public addresses
3 to Bitcoin?

4 A. I was given files to everything.
5 So I don't -- at that time I didn't know.

6 Q. Do you know now?

7 A. So you are asking me what I have
8 learned through this litigation process, is that
9 you are asking me?

10 MS. McGOVERN: I would like to ask,
11 to interpose my objection, and to the extent that
12 the question seeks to invade spousal privilege
13 about this litigation and the claims against
14 Dr. Wright, I am going to instruct her not to
15 answer. I asked you to rephrase the question to
16 avoid this instruction because, like you, I would
17 like Miss Watts to tell us everything she knows
18 without invading any privileges. So I ask you to
19 please rephrase.

20 BY MR. BRENNER:

21 Q. At the time you received the files
22 from Mr. Mayaka, you did not know whether they
23 contained Bitcoin public addresses, that is
24 correct?

25 A. At the time I received it I did not

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2 know what it contained at all.

3 Q. Okay. Since that time, without
4 telling me what you learned, has your knowledge or
5 understanding of what those files contain changed?

6 A. Yes.

7 Q. Is the only information you have as
8 to what is in that file, did it come to you from
9 either the lawyers for Dr. Wright or Dr. Wright
10 himself?

11 A. Both.

12 Q. Have you yourself, regardless of
13 what anyone else told you, have you yourself
14 reviewed the files from Mr. Mayaka and confirmed
15 that they contain public addresses?

16 A. So, I am not technical. If you
17 gave me public addresses I would not even know
18 what they were.

19 Q. So the answer is no, you have not
20 done that?

21 A. I have reviewed the files, but we
22 have accountants doing those sort of things for
23 us.

24 Q. All I can ask about is you. Have
25 you reviewed the files ----

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2 A. I have reviewed the files.

3 Q. -- and determined that they contain
4 public addresses to Bitcoin?

5 A. I am not able to determine that
6 because I am not a technical person.

7 Q. Okay, that is all I am asking. We
8 are done with that document. We have about
9 fifteen minutes before lunch. Let me go back to
10 tab 35. According to this e-mail and the story
11 you told me, in 2012 you were having difficulty --
12 you were having financial difficulties in your
13 family; is that fair?

14 MS. McGOVERN: I am Object to the
15 form of the question. If you would like me to
16 tell you exactly why I object to the form so you
17 can rephrase it I will be happy to do so.

18 MR. BRENNER: No, I am good, thank
19 you.

20 BY MR. BRENNER:

21 Q. You were having financial
22 difficulties in your family; correct?

23 A. It is all relative, isn't it? We
24 could pay our bills, we weren't starving.

25 Q. Well, you did tell me you were

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2 having trouble putting proper food on the table;
3 correct?

4 A. So we could not get the best steak
5 for the kids, no. We were eating a lot of beans
6 and spaghetti bolognaise.

7 Q. You were making sacrifices because
8 of the financial condition that you and your
9 family were in?

10 MR. SAOUL: I am going to challenge
11 this. Please be careful here not to stray outside
12 your scope. I will allow this question to be
13 answered, but I will expect it quickly to return
14 to the appropriate territory.

15 MR. BRENNER: Sure. I am picking
16 up on an answer. It will be a three minute
17 segment.

18 BY MR. BRENNER:

19 Q. That is what you told me earlier,
20 correct, that you were mad at Craig because you
21 didn't understand why, if he had so much Bitcoin,
22 you guys were having trouble with money; correct?

23 A. Is as I said to you, my
24 understanding was not correct. This is the
25 problem. I had an incorrect understanding of what

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2 was going on. I was just frustrated and I was
3 just venting, so we had many fights, yes.

4 Q. Right. The part that is wrong --
5 what was wrong, what was wrong about your
6 understanding?

7 A. Well, I think a lot of things that
8 I have written here, I didn't even understand what
9 I was writing.

10 Q. I am not looking at the e-mail.
11 What was wrong about your understanding in the
12 conversation you were having with Dr. Wright when
13 you were frustrated about the finances?

14 A. I don't recall exactly the
15 specifics of what I understood. I do recall that
16 when we did have several conversations in 2012
17 that he put me straight, and I understood things.
18 I don't recall the little bits that I didn't
19 understand, I just remember thinking everything
20 was very confusing.

21 Q. Right, and what he explained to you
22 was there was a good reason that he had why he
23 could not use the Bitcoin that Wright
24 International Investments and Tulip Trading had;
25 correct?

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

4 BY MR. BRENNER:

5 Q. Is that correct?

6 A. No, he didn't say why he couldn't
7 use it. He just explained to me how it was
8 structured, because my understanding was
9 apparently all incorrect, all wrong.

10 Q. Your understanding was you were the
11 trustee that was -- holding the share of the trust
12 that was holding the shares to the companies that
13 owned all this Bitcoin; correct?

14 A. So my understanding was that I was
15 a trustee, yes, I am the trustee.

16 Q. Right, and you understood that the
17 ability to use that Bitcoin was limited by the
18 scope of the trusts?

19 A. Yes.

20 Q. You understood that if that Bitcoin
21 that was held by Tulip Trading and Wright
22 International, although you couldn't use it, had a
23 lot of value; right?

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

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2 A. At that time I am not sure how much
3 value there was, to be honest, in 2011.

4 BY MR. BRENNER:

5 Q. It had enough value to put proper
6 food on the table; right.

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

9 MR. SAOUL: This is not within the
10 scope of the order. You are allowed to ask about
11 the ownership, you are allowed to ask about the
12 trusts ----

13 MR. BRENNER: Let's excuse the
14 witness so I can explain to you. I can't do it in
15 front of the witness, so if you want to take the
16 time to do it, that is fine. Excuse the witness.
17 I cannot do it in front of the witness. It is not
18 proper.

19 MR. SAOUL: Would you pop out for
20 two minutes, Miss Watts. We will come and get
21 you.

22 THE WITNESS: Sure.

23 MR. SAOUL: Thank you.

24 THE EXAMINER: Before she goes --
25 could you just call her back one second -- that

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2 she should not discuss her evidence with anybody
3 while she is out of the room. Could you just tell
4 her that.

5 (The witness withdrew from the room)

6 (For Proceedings in the Absence of the Witness

7 See Separate Transcript)

8 (The witness returned,

9 questions by Mr. Brenner, continued)

10 MR. SAOUL: Mr. Brenner is going to
11 resume his questioning now, Miss Watts.

12 THE WITNESS: Okay, sure.

13 BY MR. BRENNER:

14 Q. Miss Watts, just to reorient you,
15 we are on tab 35?

16 A. Yes, sure.

17 Q. This document, dated May 28 2012,
18 in part is talking about talking about trusts;
19 correct?

20 A. Well, it was a conversation that my
21 husband and I eventually had several conversations
22 of. I am not quite sure when it was written. As
23 said, I do not recall specifically writing this.
24 I recall that at the time I was very, very, very
25 angry with him, so.

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2 Q. Okay ----

3 A. I don't know if it was dealing with
4 trust, as in me trusting him, or trusts as in --
5 I do not recall.

6 Q. That is not really -- let us stick
7 to the document for a second. It is not talking
8 about your trust in him. It says: "Let me get
9 this straight, you have a secret trust, a trust
10 Dave knows of, a trust for gambling, or as you say
11 gaming, and a trust for software." We are
12 actually talking about trusts, not the word like
13 "I trust you dear"; correct?

14 A. Perhaps, I do not remember. I do
15 not remember. This is eight years ago.

16 Q. Okay. I am going to assume for the
17 purpose of my question that this e-mail is written
18 in 2012. I know that you cannot confirm that, but
19 I am going to assume it for the purpose of my
20 question, okay?

21 A. Sure.

22 Q. In 2012 you are not married to
23 Dr. Wright; correct?

24 A. No.

25 Q. You are the trustee for the trust

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2 that has been set up for the benefit of he and his
3 entire family -- he and his family; correct?

4 A. That is correct.

5 Q. That trustee is holding all of the
6 Bitcoin that was mined by Information Defence and
7 held by Wright International; correct?

8 A. That is correct.

9 Q. That trust is also holding whatever
10 Bitcoin had been purchased as of that point and
11 not stamped by Tulip Trading; correct?

12 A. That is correct.

13 Q. You agree with me at that point
14 that trust holds hundreds of thousands, if not a
15 million Bitcoin?

16 A. I don't know how much was in it at
17 that time.

18 Q. You agree with me that regardless
19 of how much Bitcoin was being held, in those
20 companies, the shares of which were being held by
21 the trust, you agree with me that you were having
22 frustration with Craig over financial issues
23 within your household?

24 A. Yes.

25 MR. BRENNER: Do you want to take

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2 our lunch break?

3 THE EXAMINER: Yes, that seems an
4 appropriate time. If we say 20 minutes, we will
5 all meet again. So can we go off the record now.

6 MR. BRENNER: Alright, thank you.

7 THE COURT REPORTER: Going off the
8 record at 3.15 p.m.

9 (A short break off the record
10 from 3.15 to 3.35p.m.)

11 MR. BRENNER: Miss Watts, do you
12 recall a company called Strasan -- S-T-R-A-S-A-N?

13 A. Vaguely, yes.

14 Q. Was that a company that was
15 associated with Dr. Wright?

16 A. Yes, I believe so.

17 Q. Were you a director of that
18 company?

19 A. I don't recall that. I might have
20 been.

21 Q. Let us go -- I don't know either.
22 Let me look at that earlier exhibit we looked at
23 and see if that is one of the listed companies.
24 It does not appear to be. Okay, so you think you
25 may or may not have been a director?

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2 A. I don't recall.

3 Q. Okay, fair. What was Strasan?

4 A. I really don't remember. I know
5 that Craig worked with four other guys on it.
6 I don't know what they were doing. I think they
7 were trying to do some perhaps hardware stuff, but
8 I think one of the men they wanted to work on
9 consulting work, so it did not last for very long.

10 Q. Was one of the guys that working on
11 Strasan with Craig Dave Kleiman?

12 A. No, Shaoib Usev(?), I was thinking
13 of a different person. I believe his name was
14 Shaoib -- S-H-A-O-I-B, I think.

15 Q. If you could go to tab 24?

16 A. Yes. It is a different Strasan
17 that we are talking about.

18 Q. What is this Strasan?

19 A. I don't know. I have not seen this
20 one at all.

21 Q. Okay. You have never seen this
22 document?

23 A. I don't recall, no.

24 Q. Have you ever heard of company
25 called W&K Info Defense?

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2 A. Yes, I have heard of it.

3 Q. What do you know about that
4 company?

5 A. Nothing, it was before my time.
6 I think it was Lynn's(?) company. So I wasn't
7 involved?

8 Q. You used that expression a couple
9 of times, you said, "It was before my time". What
10 are you defining as before your time?

11 MR. SAOUL: Can I just ask, are we
12 marking tab 24 as an exhibit or ----

13 (Exhibit 7 was marked for identification)

14 MR. BRENNER: Sure, we didn't do
15 anything with it, but we can mark it. That is
16 better. Thank you.

17 A. It was before I met Craig, I think.

18 Q. When you say "before my time", it
19 is before 2010?

20 A. Yes, or I wasn't involved in it.
21 But mostly, I really mean it is before I met him,
22 yes.

23 Q. Is it your testimony, as you sit
24 here today, that you don't know anything about W&K
25 Info Defence?

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2 A. I know that the it was Lynn's
3 company, and I remember asking Craig about it and
4 he said that it was Lynn's company, and I think
5 there were other shareholders, but I don't
6 remember. I wasn't actually involved with that
7 company.

8 Q. Did any of the companies that you
9 were a director of ever use intellectual property
10 that had been developed by W&K Info Defence?

11 A. I don't recall.

12 Q. You don't recall, or the answer is
13 -- that is it, you don't recall?

14 A. Yes, I really don't remember.

15 Q. Do you know if W&K Info Defence
16 ever had Bitcoin?

17 A. Well, I wasn't part of W&K so
18 I actually really don't know.

19 Q. Do you think, do you know if your
20 husband was ever involved with W&K Info Defence?

21 A. I don't know.

22 Q. Do you know if Dave Kleiman was
23 ever involved with W&K Info Defence?

24 A. I think so, because I am sure Craig
25 had said that it was Lynn's company with Dave.

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2 Q. Your understanding was it was a
3 company that Dave had with Lynn?

4 A. Yes.

5 Q. Lynn's training is as a nurse;
6 correct?

7 A. I don't know.

8 Q. What is DeMorgan?

9 A. It is the company that we had in
10 Australia as we left Australia.

11 Q. Is that the company that had its
12 offices in Sydney that we talked about earlier?

13 A. That is correct, yes.

14 Q. Is it fair to say that DeMorgan was
15 the primary holding company for Dr. Wright?

16 A. I don't know if it was. I just
17 know that it was a company that I worked for and
18 we had offices in Australia; it was like the
19 parent company, really.

20 Q. That is what I meant. It was the
21 parent company for the various Dr. Wright related
22 entities; correct?

23 A. I don't know if they were all --
24 they were not related to him, they were -- it was
25 a parent company for several different companies.

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2 We hired staff through DeMorgan.

3 Q. We had gone through the exhibit
4 earlier which showed the companies -- or at least
5 purported to show the companies that you were a
6 director of. A lot of those companies were under
7 the parent of DeMorgan; correct?

8 A. I don't know.

9 Q. You don't know?

10 A. No, I think some of them were,
11 I don't know if all of them were.

12 Q. Okay. You were a director of
13 DeMorgan; correct?

14 A. I was.

15 Q. In fact, DeMorgan was established
16 in September 2014, does that sound right?

17 A. I don't recall. As I said, there
18 were many companies, so I don't know the exact
19 year. It sounds right, but I do not recall.

20 Q. Were you, as a director of
21 DeMorgan, were you an authorised signatory for the
22 company?

23 A. Yes, one of several.

24 Q. One of several, thank you. Let us
25 go to I think it is tab 23. Just let me know when

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2 you are there.

3 A. Yes, I am here.

4 Q. I think it is an eight page
5 document, does that seem right?

6 A. It is a what page document?

7 Q. It is eight pages.

8 A. Sure.

9 Q. Because I don't have that in front
10 of me, I want to make sure we are looking at the
11 same thing.

12 A. Sure.

13 Q. The first page says the DeMorgan
14 Wright family trust. What is Wright family trust?

15 A. That would be, I believe --
16 actually I cannot remember now, because it does
17 not hold anything any more, but I think the Wright
18 family trust was actually the Australian
19 representative of the Tulip Trust.

20 Q. Okay.

21 THE EXAMINER: Can we call this
22 exhibit 8.

23 MR. BRENNER: Yes, ma'am, thank
24 you.

25 (Exhibit 8 was marked for identification)

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2 BY MR. BRENNER:

3 Q. When it says IP deed of assignment,
4 do you understand that "IP" means intellectual
5 property?

6 A. I do.

7 Q. Do you recognise this document?

8 A. It is familiar.

9 Q. Okay. Turn to page 8 for me
10 please?

11 A. Yes.

12 Q. There are two signatures there, are
13 there not?

14 A. Yes.

15 Q. The first signature, it purports to
16 be from you, is that your signature?

17 A. It looks like it is my signature.

18 Q. Then the second signature, I think
19 it is fair to say, purports to be Dr. Wright; is
20 that correct?

21 A. That is what it says.

22 Q. Okay. And you were signing on
23 behalf of DeMorgan, correct, as the assignor?

24 A. Yes, it would say -- yes, that is
25 right.

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2 Q. Okay. I don't want to trick you.
3 If you go back to the third page of the document?

4 A. So, I don't think -- so the Wright
5 family trust, DeMorgan would not be the company
6 DeMorgan, though. I don't think. I think what
7 you have to do is actually look at the difference
8 ABNs and see whether they were the same thing,
9 because I don't think they are. I think it was
10 just called the Wright family trust DeMorgan, but
11 it was not DeMorgan Limited or the DeMorgan, the
12 company. ABN is an Australian Business Number, so
13 each entity would have its own number, so I don't
14 believe this would be DeMorgan, the company.

15 Q. So you think this is another
16 company you were an authorised signatory for?

17 A. No, I think this would be the
18 representative of the Tulip Trust. But as I said,
19 because I don't have all the paperwork in front of
20 me, I cannot confirm that.

21 Q. Okay. Whatever the company is, you
22 are signing on its behalf; correct?

23 A. Yes.

24 Q. And it is purporting to assign
25 certain intellectual property; correct?

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2 A. Can you point me to the page where
3 it says ----

4 Q. It is page 3(?)

5 A. Yes.

6 Q. Do you see that?

7 A. I do.

8 Q. It says that the assignor owns the
9 intellectual property and intellectual property
10 rights in the core technology. Do you see that?

11 A. Yes.

12 Q. What is the core technology?

13 A. I don't recall what the actual core
14 technology was. It is not described in here. It
15 is not in detail.

16 Q. Yes, it is. Let's go to page --
17 unfortunately these are not page numbered, it is
18 sixth page of the document. The core technology
19 is defined there; correct?

20 A. Yes.

21 Q. It has to do with certain banking
22 technology?

23 A. Sure, okay, yes.

24 Q. If you go back to page 3 please.
25 The assignee is Coin-Exch PTY LTD?

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2 A. That's right.

3 Q. That is also a company that you
4 were a director for?

5 A. Yes.

6 Q. Also a company that Dr. Wright was
7 a director for?

8 A. I don't know if he was a director.
9 I know I was.

10 Q. Okay. This assignment is dated --
11 if you look at the front page, it is September 15
12 2013, do you see that?

13 A. Yes.

14 Q. And that also coincides, so you
15 know, it is the same date that the signatures are
16 -- same date at least typed on the signature page?

17 A. Sure.

18 Q. So September 15, 2013 is how long
19 after Dave Kleiman dies?

20 A. I don't remember when he died.
21 I know he died in 2013.

22 Q. You don't recall he died in April
23 2013?

24 A. No.

25 Q. I represent to you then that he

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2 dies in April 2013?

3 A. Yes.

4 Q. This the five months later, right?

5 A. Sure.

6 Q. Let us see what the Wright family
7 trust DeMorgan, whatever that company is, let us
8 see what it is claiming is the IP that it holds,
9 okay? Do you see that, do you follow with me,
10 that is what I am going to do with you, okay?

11 A. Okay.

12 Q. If you look at paragraph 3B -- I am
13 sorry, page 3?

14 A. Yes.

15 Q. It says: "The IP held in total by
16 DeMorgan" -- describing what IP DeMorgan holds;
17 correct?

18 A. Yes.

19 Q. -- "consists of source code,
20 algorithms and technical materials that have been
21 obtained by Craig Wright R&D." You see that?

22 A. I do.

23 Q. That is your husband's company;
24 right?

25 A. Craig Wright R&D, I don't know what

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2 it was. It was a company. I am not sure if it
3 was his. It was a company.

4 Q. You are not sure if Craig Wright
5 R&D is Craig Wright's company?

6 A. They are all documented in
7 corporate records, so they are different
8 assignments for different things, I really don't
9 know.

10 Q. Okay. Then it says -- it describes
11 how Craig Wright R&D obtained the IP, does it not?

12 A. It doesn't say that that is how it
13 is obtained, but -- yes, it actually does --
14 "obtained by Craig Wright R&D".

15 Q. Yes, it says it was obtained by
16 Craig Wright from three sources -- Craig Wright
17 R&D by three sources?

18 A. Yes.

19 Q. One of the sources we talked about
20 earlier was MJF Mining Services; correct?

21 A. That's right.

22 Q. That was something that was
23 actually paid for using Bitcoin; correct?

24 A. I believe so.

25 Q. Then there was a second purchase

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2 from MJF Mining Services also paid for using
3 Bitcoin; correct?

4 A. You see, I don't know, because
5 I wasn't involved with these purchases, so
6 I actually don't know.

7 Q. Well, you were -- it actually is
8 you, you are the authorised signatory for this
9 document, are you not?

10 A. But I was not involved with the
11 purchase of MJF Mining when he purchased -- when
12 Craig Wright R&D purchased those -- whatever he
13 purchased from these people.

14 Q. Okay, so you know as of this point,
15 because you are signing the document, that
16 DeMorgan Wright trust has the IP that is assigned,
17 you just don't know how it got it?

18 A. Sorry, was the question?

19 MS. McGOVERN: Object to the form.

20 BY MR. BRENNER:

21 Q. Let me rephrase it. This is an
22 assignment of certain IP by a company that you are
23 the authorised signatory?

24 A. That is correct.

25 Q. When you signed this document did

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2 you ascertain that the intellectual property you
3 were assigning was in fact held by the company you
4 were assigning it on behalf of?

5 A. Can you ask me the question again?

6 Q. Sure. I am just asking, in this
7 assignment, when you are assigning intellectual
8 property on behalf of DeMorgan, did you confirm
9 that you actually -- the company actually had what
10 it was assigning?

11 A. I had our accountants do that.

12 Q. Okay, and you were comfortable
13 enough to sign your name to it; correct?

14 A. Yes.

15 Q. Then the third place you got --
16 that DeMorgan got IP was from W&K Information
17 Defence Research LLC; is that right?

18 A. That is what it says here. But as
19 I said, we had financial controllers and
20 accountants at that time so I got a lot of my
21 advice from them.

22 Q. But you trust them, correct?

23 A. Of course I do, yes.

24 Q. Right. And they confirm to you
25 that you have this IP to assign it?

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2 A. They did, yes.

3 Q. And they confirmed to you it was
4 accurate that in part the IP had been obtained
5 from W&K Information Defence Research LLC;
6 correct?

7 A. I believe so. I am not quite sure
8 if this was actually carried out. That is the
9 problem. We did a lot of -- there were lots of
10 deeds and there were lots of contracts and some of
11 them were in draft form. I am not sure if this
12 was actually carried out, to perfectly honest with
13 you, I do not know.

14 Q. It was signed by two parties;
15 correct?

16 A. Yes.

17 Q. Both parties to the contract;
18 correct?

19 A. Yes.

20 Q. And you just don't know if the
21 assignment actually took place; correct?

22 A. I cannot confirm that it did. I
23 really cannot. Unless I actually saw some
24 corporate documents that said it actually
25 occurred.

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2 Q. When it was through or not, you
3 have no reason to dispute as of September 15, 2013
4 DeMorgan the Wright family trust was claiming IP
5 that was once held by W&K Information Defence
6 research LLC, do you?

7 A. I don't know the details, I really
8 don't. As I said, I had my accountants, my
9 financial controllers give me advice on that, so I
10 don't know.

11 Q. My only question is, do you have
12 any reason to dispute the accuracy of this
13 document?

14 A. Currently I have a lot of reason to
15 doubt actually, because I said to you before, we
16 had -- our computers were hacked so I am very
17 jaded, I really don't know what is real and what's
18 not any more.

19 Q. So when was the computer hacked?

20 A. In 2014 we knew that our computer
21 was hacked. I don't know whether it was hacked in
22 2013 or not. But in 2014 we were getting very,
23 very strange messages.

24 Q. So you think it is possible that
25 someone hacked your computer, made a document,

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2 dated it to 2013, forged your signature, forged
3 Dr. Wright's signature, and therefore you doubt
4 the authenticity of this exhibit. Is that your
5 testimony?

6 A. No, I didn't say that at all. You
7 asked me whether I doubt the authenticity of this
8 document and I really don't know. As I said,
9 I really don't know. It could be perfectly valid
10 and it might be not be, I do no know. You are
11 asking me to tell the truth. I am delling the
12 truth.

13 Q. Of course. Putting aside the
14 document, do you doubt that various entities of
15 which you were a director obtained IP once held by
16 W&K Information Defence; do you doubt that?

17 A. I don't know, because I don't have
18 the actual records in front of me. If I did, if I
19 could see the actual assignments and if I knew
20 that they were actually carried out, that is a
21 different story, but I don't. These are
22 photocopies, these are things that might --
23 I don't know who handed these ones in. They could
24 have been from our computers that were hacked, so
25 I don't know. If I went straight directly to our

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2 corporate secretary, who could give me all the
3 corporate records, then I could answer your
4 question.

5 Q. Who is your corporate secretary?

6 A. In Australia, I do not remember.
7 We had a corporate secretary in Brisbane, I do not
8 remember the names.

9 Q. If I were sitting here and I wanted
10 to know if this document was authentic, are you
11 telling me that you cannot answer that question?

12 A. Yes. I don't know.

13 Q. Are you telling me that you don't
14 know who can answer that question?

15 A. I don't know.

16 Q. Okay. Let's look at another one.
17 Let's go to tab 30. Are you there?

18 A. Yes.

19 Q. It is a long document. It is 39
20 pages long I think.

21 A. Yes.

22 Q. So at any point if you want to look
23 somewhere else in the document to get context you
24 are welcome to do so. I don't think it is a good
25 use of our either of our time to read 40 pages to

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2 ourselves right now; okay?

3 A. Sure.

4 Q. Do you recognise this document?

5 A. I recognise something similar to
6 this, yes.

7 Q. Okay. It is a document that is
8 produced by a company called Business Reports and
9 Values; correct?

10 A. Yes.

11 Q. That was a company that was
12 retained by entities you were affiliated with to
13 do evaluation of certain (unclear) engineering;
14 correct?

15 A. That is right.

16 Q. And that valuation was done on or
17 about November 13, 2014; correct?

18 A. I don't remember. I know we had
19 valuations done on the company, yes.

20 Q. The companies of which the
21 valuations were being done, one was called
22 Cloudcroft; is that right?

23 A. Yes.

24 Q. You were a director of that
25 company; correct?

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2 A. I don't remember.

3 Q. Okay.

4 THE EXAMINER: Shall we call this
5 exhibit 9.

6 MR. BRENNER: Yes, ma'am, thank
7 you.

8 (Exhibit 9 was marked for identification)

9 BY MR. BRENNER:

10 Q. You don't recall whether you were a
11 director of Cloudcroft at any point?

12 A. So Mr. Brenner, as I explained to
13 you before, I was a director of many companies
14 over many years. At some point I was a director
15 and at other points I wasn't a director of
16 different companies. So you are asking me to
17 recall now if I was a director of a particular
18 company seven years ago, eight years ago. I don't
19 recall, no.

20 Q. So my question may have been
21 imprecise. I am not asking on this date, I am
22 asking at any point were you a contractor of
23 Cloudcroft?

24 A. I don't remember. I was a director
25 for many different companies at many different

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2 times.

3 Q. I think you told me earlier you do
4 remember you were a director for Hotwire; correct?

5 A. Yes, because I worked very
6 specifically with -- actually was I? This is the
7 thing, I don't even remember if I was a director
8 for Hotwire. I was a chief people officer for
9 them. I probably was a director. I do not
10 recall. I would need to actually look at the
11 corporate records.

12 Q. What about Coin-Exch, do you recall
13 being a director of that one?

14 A. Coin-Exch I do remember.

15 MR. SAOUL: I thought we started
16 with these questions.

17 MR. BRENNER: We did, I cannot --
18 we did. Now we have a document, I want to see if
19 this is refreshes her recollection, because she
20 claims she does not remember, so I want to see if
21 this refreshes her recollection.

22 A. My answer is still the same. It
23 was many years ago, I was a director of many
24 different companies. Asking me now I don't
25 remember. I worked on all of them at some point.

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2 I worked with all of my staff on all of them at
3 some point. Whether I worked as a director or
4 whether I worked as a chief people officer or an
5 HR, I worked across all of them, and I do not
6 recall.

7 BY MR. BRENNER:

8 Q. And you will give me the same
9 answer if I ask about COLN; correct?

10 A. That is correct.

11 Q. If you turn to page 7 of the
12 document, do you see that?

13 A. I do.

14 Q. Okay. It says the valuation report
15 is concerned with valuing source code at the
16 (unclear) of four separate companies; do you see
17 that?

18 A. Yes.

19 Q. And that is consistent with your
20 recollection that over the years you did
21 valuations for various companies that you were
22 involved with; correct?

23 A. Yes, we did.

24 Q. Let's see if the next paragraph
25 refreshes your recollection of whether you are a

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2 director. It says: "Ownership and capital
3 structure." Do you see that?

4 A. Yes.

5 Q. It says: "The controlling entity
6 for the above" -- which is the four companies --
7 "is DeMorgan Ltd." Do you see that?

8 A. Yes.

9 Q. So these are four companies that
10 were controlled by DeMorgan Ltd; correct?

11 A. That is correct.

12 Q. And those companies, the directors
13 of those companies, there is a grand total of two
14 people; correct?

15 A. That is what it says here.

16 Q. One is Dr. Craig Steven Wright;
17 correct?

18 A. That is what it says here, yes.

19 Q. And one is Ramona Watts. That is
20 you; correct?

21 A. That is what it says.

22 Q. Does that refresh your recollection
23 that you were one of two directors for the holding
24 company that controlled Cloudcroft, Hotwire
25 Coin-Exch and CO1N?

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2 A. Well, I had actually said to you
3 before that I was a director of DeMorgan.
4 I remembered that.

5 Q. Sure. Do you now recall that
6 DeMorgan controlled these four entities?

7 A. Controlled is the wrong word.
8 I would not use the word controlled. That was not
9 my understanding, that it was controlled.
10 I understood that DeMorgan actually hired a lot of
11 staff for those different entities. I didn't
12 write this paper.

13 Q. So you would quarrel with the term
14 the controlling entity?

15 A. No, I would not, because if that is
16 how it is written in business terms, perhaps, then
17 it would be the right phrase to use. I don't
18 know. I would certainly speak to, I don't know, a
19 business lawyer, perhaps, to get advice on whether
20 that was the right term or not.

21 Q. Okay. Let us look at -- give me
22 one second. Turn to page 15. Are you there?

23 A. Yes.

24 Q. Okay. So let us walk through to
25 together and see how the companies are discussed.

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2 It says "Hotwire PE has purchased the W&K ID
3 package as part of the business strategic
4 direction with the objective of establishing a
5 worldwide Bitcoin banking system." Do you see
6 that?

7 A. I do.

8 Q. Does that refresh your
9 recollection, do you understand, as you sit here,
10 that WKID refers to W&K Information Defence?

11 A. I don't know.

12 Q. You don't know?

13 A. I don't know that it is W&K
14 Information Defence. I can only assume that it is
15 but I actually really don't know.

16 Q. Okay. Then it says that Hotwire
17 purchased the package relating to the Bitcoin
18 banking system from that entity; correct?

19 A. That is what it says here.

20 Q. You have no reason to dispute that;
21 correct?

22 A. No, I don't, but I don't know.

23 Q. If you go to the end of that page,
24 do you see that?

25 A. Yes.

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2 Q. The last paragraph?

3 A. Yes.

4 Q. It says in the last sentence, it
5 says: "Hotwire will be able to develop an
6 internationally recognised Bitcoin banking system
7 based on the W&K ID software." Do you have any
8 reason to dispute the accuracy of that?

9 A. No, I do not think so. No.

10 Q. Let us go to the next page, it is
11 going to go through the next company, Cloudcroft.
12 Do you see that?

13 A. Could we go through company by
14 company, so if you are asking me the question of
15 whether or not I dispute that Hotwire was going to
16 develop a banking system, can you finish your
17 questioning on that? Because I can tell you that
18 we never did. We tried, but we never did, as in
19 Hotwire. So I am not quite sure where you are
20 headed with these questions, that is all. It is
21 very confusing for me. I see a lot of things that
22 are written in this document.

23 Q. Okay. Your counsel have the
24 opportunity to ask you other questions about the
25 document. I am just literally going to the next

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2 line of the document. Okay?

3 A. Okay.

4 Q. The next page is -- we finish page
5 15, we are on page 16, okay?

6 A. Yes.

7 Q. That is a discussion of Cloudcroft;
8 right?

9 A. Yes.

10 Q. It says it is an Australian company
11 specialising in developing and researching systems
12 preventing cyber criminal attacks; correct?

13 A. That is what it says, yes.

14 Q. Do you have any reason to dispute
15 that?

16 A. I don't know have all my company
17 record notes on me, so I don't currently, but if I
18 did it might be different. I didn't write this so
19 I really don't know.

20 Q. Okay.

21 A. I do not know it is accurate.

22 Q. If you go to the bottom of that
23 page, where it describes what percentage of the
24 source code used by Cloudcroft is coming from WK,
25 do you see that?

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2 A. Yes.

3 Q. And it says WK source accounted for
4 46% of the source for Cloudcroft; correct?

5 A. That is what it says, I do not know
6 what it means exactly. As I said, I didn't write
7 this.

8 Q. Then it says at the end: "W&K
9 source will enable research activities associated
10 with a virtual universe." Do you see that?

11 A. I see what it says.

12 Q. Any reason to dispute it?

13 A. As I said, I didn't write it so
14 I don't know where it came from.

15 Q. This is a company that we
16 established is controlled by an entity that you
17 are one of two directors of, so I am asking you,
18 regardless of what it says, do you have any reason
19 to dispute that?

20 MS. McGOVERN: Let me state my
21 objection to that question for the record. You
22 have not established anything, Mr. Brenner,
23 I think it is an inappropriate question.

24 MR. BRENNER: I am not familiar
25 with that legal objection, but it is noted.

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2 BY MR. BRENNER:

3 Q. Go ahead.

4 A. What was your question again?

5 Q. My question is, regardless of what
6 the document says, do you have any reason to
7 dispute, based on you being a director of DeMorgan
8 LTD, which was the controlling entity of
9 Cloudcroft, the description that Cloudcroft was
10 using -- was obtaining 46% of its source share
11 from W&K?

12 A. Well, I don't have the company
13 records in front of me to check, so I don't know.

14 Q. Let us go to the next one, which is
15 the Hotwire PE?

16 A. Hmm hmm.

17 Q. That one you actually have better
18 recollection because you actually worked for that
19 company too; correct?

20 A. I did.

21 Q. You were the people officer?

22 A. I was.

23 Q. What is that?

24 A. It is HR role, really.

25 Q. Good name. It says: "Hotwire PE

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2 accelerates early stage technological and
3 scientific research programmes creating world
4 class solution platforms." Do you see that?

5 A. Yes.

6 Q. Do you think that a fair
7 description, at least on a general basis, of what
8 Hotwire was doing?

9 A. That one, yes, I would say it was,
10 yes.

11 Q. "The primary focus is on high
12 leverage automated systems with potential to
13 change how the world operates on a day-to-day
14 basis." Do you agree with that statement?

15 A. I do.

16 Q. You agree with that, do you
17 understand and agree that that in part had to do
18 with using Bitcoin?

19 A. No, it does not say that.

20 Q. I am not asking if it says that.
21 Do you understand that the "change how the world
22 operates on a day-to-day basis" was in part
23 relating to the use of crypto coin?

24 A. No.

25 Q. Then it says: "Working with both

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2 government and commercial partners the company
3 seeks to leverage the opportunities of a globally
4 interconnected cyberspace thereby opening
5 opportunities for commerce and trade." Is that a
6 fair description of what Hotwire was doing?

7 A. Yes.

8 Q. Okay. Then if you can scroll down,
9 it also allocates, and says that 32% of the source
10 share comes from W&K. Do you see that?

11 A. Well, I don't know what it means.
12 As I said, I didn't write this.

13 Q. Do you have any reason to dispute
14 that?

15 A. I don't have my company records in
16 front of me, so I cannot really say if this is
17 accurate or not.

18 Q. By the way, do you doubt the
19 authenticity of this document?

20 A. I don't know.

21 Q. You don't know one way or the
22 other?

23 A. I don't.

24 Q. Okay. Do you have an independent
25 recollection of retaining Business Reports and

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2 Values for anything?

3 A. I know we did do something very
4 similar, it could very well be this document,
5 I really don't know. We did a valuation and
6 I believe it was with -- is it BRV? I think that
7 was one of the companies, so I know we did a
8 valuation. I don't know if this was the final
9 report, I don't know if there were several
10 reports, I don't know if this is a draft, I do not
11 know.

12 Q. Okay. It is BRV, just for the
13 record, Business Reports and Values?

14 A. Sure, yes.

15 Q. You recognise that company, you
16 just don't remember this particular report?

17 A. I don't remember this particular
18 report, I remember receiving reports from them.
19 I do not know whether it is this one, I do not
20 know if this is the first or the final or the
21 draft. I do not know. This could be incorrect,
22 and we could have pulled them up and said, "Look,
23 you know, this is wrong, do it again", because a
24 lot of times it was our accountant who actually
25 dealt with them. And if our accountant did not

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2 understand something and sent something off then
3 it would not have been correct and we would have
4 had to correct them.

5 Q. Go to page 4 -- don't worry about
6 page 4. I will keep going. On the bottom of page
7 17 it says: "W&K source will enable the creation
8 of world class solution platforms in support to
9 research activities undertaken as part of
10 Coin-Exch CO1N and Cloudcroft. "Do you see that?

11 A. I see that that was written, yes.

12 Q. Any reason to dispute it?

13 A. As I said, again, and I will say it
14 again, I do not have any of my corporate records
15 in front of me so I cannot check. I do not know
16 if this is a draft, first draft, second draft, or
17 the tenth draft.

18 Q. Okay.

19 A. Our accountants liaised with these
20 people, our accountants often made -- sometimes
21 made mistakes or didn't understand something.
22 They could come to us to check. We would then go
23 with through our corporate records with our
24 corporate secretary and say, "this is wrong" or
25 "this is right". But I would then have all my

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2 records in front of me so I could check. You are
3 asking me to authenticate something and I have
4 nothing in front of me to check, so I cannot do
5 that.

6 Q. Okay. I am not sure you have
7 nothing, but let's see if this helps you. Let's
8 go to page 23. This is not a draft, is it, ma'am.
9 This is a signed document, isn't it?

10 A. I can see a signature, but I do not
11 know if it is a draft or not.

12 Q. As you sit here, it is your
13 testimony that Mr. Goldstein may have signed this
14 but it was just in draft form as far as he was
15 concerned?

16 MR. SAOUL: I am sorry, I do object
17 to that. This is not a document that this witness
18 has produced, it is not her signature. These are
19 not matters within her knowledge. Unless you have
20 any basis for suggesting otherwise you cannot ask
21 her a question like that.

22 MR. BRENNER: Sir, I just
23 established earlier in the document she is the
24 director of the company that sought this report.
25 Please, of course it is her document. Do you want

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2 to go back, we can go back if you would like. Let
3 me try to keep this moving.

4 BY MR. BRENNER:

5 Q. Let's go back again, go back to
6 page 7, do you see that? Do you see that? It is
7 an evaluation of four companies, Cloudcroft,
8 Hotwire, Coin-Exch and CO1N; correct?

9 A. That is what the document say.

10 Q. According to the document those are
11 all part of the holding company and controlled by
12 something called DeMorgan Ltd; correct?

13 A. Well, it is according to this
14 document that I didn't write. And as I said to
15 you before, we have had many drafts of different
16 documents, and we have perhaps go gone back and
17 said "this is not right" or "this is incorrect".
18 I do not know if this is the first draft or the
19 final draft.

20 Q. Okay, and you are identified as a
21 director of DeMorgan Ltd; correct?

22 A. I have always said that I am a
23 director of DeMorgan, yes.

24 Q. Thank you. Let's go back to page
25 18 now. This is Coin-Exch; correct?

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2 A. That is right.

3 Q. This one clearly has to do with
4 Bitcoin, does it?

5 A. It was an exchange platform, so,
6 yes.

7 Q. "Coin-Exch will offer exchanges in
8 trades between Australia dollars and Bitcoins";
9 correct?

10 A. Yes.

11 Q. "It will also offer trading
12 products with the ability to exchange Bitcoin with
13 other national currencies, commodities and Bitcoin
14 derivatives"; correct?

15 A. You see, this is what it says, but
16 you understand that Coin-Exch never did that in
17 the end.

18 Q. Okay. Did I read it correctly?

19 A. You read it correctly and the
20 wording here is correct, but it actually did not
21 do that in the end. We did not have the right
22 staff, we didn't have enough resources to do it.
23 So a lot of what says here in this document, they
24 are lovely words, but a lot of it didn't actually
25 happen.

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2 Q. Okay. It says that Coin-Exch is
3 also using W&K source, does it not?

4 A. That is what it says on this piece
5 of paper. I actually don't even know if it is
6 using it to source, it says "source share", and
7 I actually really do not understand that. I don't
8 know what it means because I didn't write it.

9 Q. Okay. Then the next, at the end it
10 says: "W&K source will enable the creating of a
11 fast and stable trading platform, trade Bitcoin as
12 fundamental currency to buy and sell traditional
13 assets and securities." Correct?

14 A. That is what is written on this
15 piece of paper.

16 Q. The last one is CO1N. Am
17 I pronouncing that right, because it is a number.
18 Do you refer to it as "coin"?

19 A. It is CO1N, yes.

20 Q. This one, this company also has to
21 do with Bitcoin, does it not?

22 A. It does not have to do with
23 Bitcoin, this was a wallet that we were trying to
24 produce.

25 Q. "CO1N is offering an online

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2 scalable e-wallet solution with secure vault
3 technology for the Bitcoin market." Correct?

4 A. It does not have to do with
5 Bitcoin.

6 Q. Okay, has to do with Bitcoin
7 wallets?

8 A. It is a wallet, it is a Bitcoin
9 wallet, yes.

10 Q. Yes ma'am. Again, the same thing,
11 using W&K source; correct?

12 A. I don't know, I do not know what it
13 means when it as source share because I didn't
14 write it. I did not provide the information for
15 any of this.

16 Q. Okay. It says: "W&K source will
17 enable the development of transaction protocols
18 and the rule based algorithms to significantly
19 reduce transaction times and design novel security
20 protocols and encryption algorithms without
21 compromising transaction times or scale ability."
22 Do you have any reason to dispute that?

23 A. I don't know whether this actually
24 happened or not. I know that we never finished
25 the wallet. As with Coin-Exch we did not have the

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2 resources and we did not have the people. So
3 I can tell you that this was not finished, it
4 wasn't even half done, I don't think, which is
5 very disappointing, because when we started this
6 there was so much potential.

7 Q. At the very end there is a
8 conclusion about the valuation, is there not, page
9 23, it is near the very end, not the very end?

10 A. That's right.

11 Q. For those four companies it assigns
12 the value of the software which used in part W&K
13 source at \$378,475,713; correct?

14 A. That is what is written there, but
15 I do not understand when it says using W&K source.
16 I did not provide the information. I don't know
17 if any of this information is correct.

18 Q. Okay. Do you know Lee Goldstein?

19 A. No.

20 Q. Alright, let's move on. Earlier
21 I asked you a question and I inadvertently limited
22 the question. I had asked you to tell me
23 everything that Dave Kleiman talked you about
24 Bitcoin. Let me just broaden it out. Can you
25 tell me everything that Dave Kleiman ever told

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2 you, other than what you have told me before?

3 MR. SAOUL: That is an
4 exceptionally broad question, Mr. Brenner.

5 MR. BRENNER: Intentionally so.

6 MR. SAOUL: Well, yes, but I do not
7 see how any witness could possibly be ever
8 reasonably expected to answer a question of that
9 nature. I mean it is broad beyond belief. Could
10 you please try to particularise it a little bit.

11 BY MR. BRENNER:

12 Q. Let me start with what you told me,
13 then we can see if you can tell me if there is
14 anything else.

15 A. Sure.

16 Q. I am basing it on my notes. If I
17 get it wrong, you will tell me, okay. I believe
18 you told me that Dave Kleiman never discussed with
19 you anything about Bitcoin. Is that correct?

20 A. That is right.

21 Q. I believe you told me that you had
22 lots of -- or some discussions with Dave where you
23 talked about Craig's personally?

24 A. Yes.

25 Q. Right, things about how he could be

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2 difficult and things like that, right?

3 A. That is correct.

4 Q. You told me that Dave Kleiman also
5 told you, or said to you words to the effect of,
6 "I know Craig can be difficult but he is really
7 creating something brilliant."

8 A. Yes.

9 Q. I think that is all you told me so
10 far. Does that accord with your memory?

11 A. Yes.

12 Q. Okay. Are there any other subject
13 matters that you discussed with Mr. Kleiman?

14 A. Sure, I discussed my children,
15 I ----

16 Q. I don't need to know about that.
17 What else?

18 A. I seriously cannot remember.
19 I might have complained about my landlord.

20 Q. That is personal nature, I don't
21 need to know about it.

22 A. Right, so most of my conversation
23 with him was personal.

24 Q. Okay. Maybe this will address your
25 counsel's concern, which I take, which is, other

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2 than personal things, are there any other things
3 that you have not told me about that you discussed
4 with Dave Kleiman?

5 A. That I discussed personally with
6 him, no. He was usually having a conversation
7 with Craig, I would pop in and say, "How are you",
8 and we would be having a chat.

9 Q. Anything you overheard in those
10 conversations, other than what you have already
11 told me?

12 A. So, I've heard Craig getting
13 annoyed with him because Dave didn't understand
14 certain things. I know Craig was often trying to
15 explain things to him but I don't know what in
16 particular. That I couldn't tell you, but I ----

17 Q. I didn't mean to cut you off.
18 Anything else?

19 A. Not really. I mean, I am trying to
20 think now as hard as I can, as I said, most of the
21 time I would walk into a conversation and say,
22 "Hello, how are you", have a bit of a
23 conversation. Then if Craig walked out to go to
24 the bathroom or get something to eat we would have
25 a chat.

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2 Q. Okay. As you sit here today, and
3 I appreciate you are trying your best, have you
4 told me everything you recall discussing with
5 Mr. Kleiman?

6 A. Yes.

7 Q. And everything you recall over
8 hearing?

9 A. Yes, I ----

10 MR. BRENNER: Okay. I do not know
11 where we are vis-?-vis breaks. Are we up for a
12 break, or no. I don't remember.

13 THE EXAMINER: We are due for one.
14 You have a bit more time. Does anybody feel they
15 need a break now?

16 THE WITNESS: I am okay, I am fine.

17 MR. BRENNER: I am fine. Let's try
18 to go 10 or 15 more minutes.

19 THE EXAMINER: Let us go on while
20 we can.

21 MR. BRENNER: Yes. I have been
22 trying to keep a tab on the time and I lost this
23 one.

24 THE EXAMINER: We came back at
25 about 35 ----

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2 MR. BRENNER: I will shoot for 35,
3 and I will let you know if there is a breaking
4 point before that.

5 BY MR. BRENNER:

6 Q. Miss Watts, there came a time after
7 Mr. Kleiman, Dave Kleiman passed away, that you
8 had communications with Ira Kleiman. Do you
9 recall that?

10 A. I do, yes.

11 Q. There were communications
12 originally between your husband and Dave's father
13 Louis. Were you aware of those?

14 A. Craig said to me -- he had said to
15 me that he was going to contact Dave's father,
16 yes.

17 Q. Let me just get this out of the
18 way. Did you ever have any contact with David's
19 father, Louis?

20 A. I don't remember, I don't remember,
21 I remember dealing with Ira, but I don't know
22 whether I dealt with Louis, I don't know.

23 Q. Good, you answered my next
24 question, which was you do have a recollection of
25 dealing with Ira?

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2 A. I do.

3 Q. We talk about this, I am going to
4 ask you to accept my representation that Dave died
5 in April 2013?

6 A. Okay, sure.

7 Q. Just to give you a time frame.

8 A. Sure.

9 Q. Do you know when -- was the first
10 contact between your family, and I mean your
11 family, you or your husband and the Wright family
12 post Dave's death, was that from between Craig and
13 Louis?

14 A. I don't know. I think so. I don't
15 know because I didn't reach out to anyone.

16 Q. Because you told me Craig told you
17 that he was reaching out to Louis. Do you know
18 when that contact first happened?

19 A. No, I don't know.

20 Q. Do you know approximately, even a
21 year that it happened?

22 A. I have no idea.

23 Q. Do you know why Craig was reaching
24 out to Louis?

25 A. Yes.

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2 Q. Why is that?

3 A. Because Craig had offered Dave's
4 shares in -- I think it was Coin-Exch, for Dave to
5 do some work for Coin-Exch. The work was not done
6 though, because Dave actually died, but Craig said
7 that it was the right thing to do, to give it to
8 his father.

9 Q. So let me see if I can summarise
10 that a little bit. I think you did a pretty good
11 job. Before Dave died it is your understanding
12 that Dave was going to do certain work for
13 Coin-Exch in exchange for shares in that company?

14 A. Yes. Well, it was not my
15 understanding, I mean we were all at a meeting.
16 So there was -- I cannot remember when we had this
17 meeting, but we had several people on board. I do
18 not think it was other directors because I do not
19 think there were other directors that the time.
20 But we had -- I cannot remember who they are now,
21 but I recall having a Coin-Exch meeting where Dave
22 was supposed to have done some work, yes.

23 Q. Okay. Am I right in assuming that
24 Dave was not physically present at that meeting?

25 A. No, he dialled in remotely.

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2 Q. Do you know if he was in the
3 hospital at the time?

4 A. I don't know.

5 Q. And was there a formal contract
6 entered between Dave and Coin-Exch?

7 A. I don't recall.

8 Q. Do you recall if the contract was
9 going to be with Dave personally, or with W&K Info
10 Defence, or some other entity?

11 A. It would have been with Dave
12 personally.

13 Q. And your understanding, broad
14 strokes, was that Dave was going to do certain
15 work and -- was his payment solely going to be in
16 shares of Coin-Exch?

17 A. I don't recall.

18 Q. You recall at least part of his
19 remuneration was going to be shares in Coin-Exch?

20 A. I do not even know if it was a
21 remuneration, but yes, it was an agreement that he
22 would get shares in Coin-Exch for certain work
23 that he was supposed to have done.

24 Q. You said that Dave died before the
25 work was done, and I am just making sure

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2 I understand, was the contact done but the work
3 was not completed yet, or the contact didn't get
4 done before Dave died?

5 A. I think the contract was actually
6 done.

7 Q. Okay. And Dave, because -- whether
8 it is because of his illness and ultimately his
9 passing or whatever the reason, by the time he
10 dies the work was not complete?

11 A. No, not at all.

12 Q. Was it started?

13 A. I do not think it was even started.

14 Q. And now to bring us back to where
15 we were, your understanding is Craig reached out
16 to Louis, Louis Kleiman, to make sure that he got
17 the shares in Coin-Exch that Dave was supposed to
18 get?

19 A. Well, not so much him but Dave's
20 estate, I suppose, whoever was meant to get the
21 shares.

22 Q. That is fair. That is fair. And
23 Craig did that because he thought it was the
24 right thing to do?

25 A. That is right. It is probably the

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2 legal thing to do as well, I suppose, if you have
3 someone who has shares in a company, I do not
4 know.

5 Q. Okay. When you say the word
6 "Craig" here is it Craig or is it Coin-Exch, or
7 Craig is acting on behalf of Coin-Exch?

8 A. Well, I mean, Craig, I do not know
9 if he was a director of Coin-Exch at that time,
10 but he was the one who reached out to Louis, so
11 I say Craig.

12 Q. Okay. Now, were those shares ever
13 given to Louis Kleiman?

14 A. No, because we had negotiations
15 with Ira.

16 Q. Okay. At some point did Louis
17 Kleiman step out of the negotiations and Ira took
18 his place?

19 A. Yes, and I don't know whether it
20 was when Louis Kleiman passed away or if Ira took
21 over because Louis was sick. I really don't know
22 those details.

23 Q. Okay. You said that there then
24 ensued negotiations with Ira regarding the
25 Coin-Exch shares, is that what you said?

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2 A. That's right.

3 Q. You were involved in those
4 personally, were you not?

5 A. Yes.

6 Q. And Dr. Wright was involved in
7 those; correct?

8 A. Yes.

9 Q. Stefan Matthews was involved in
10 those; right?

11 A. At the end, yes.

12 Q. Who is Stefan Matthews?

13 A. So Stefan worked with Craig a long
14 time ago, I think when Craig was working at a
15 company called BDO, and Stefan introduced us to an
16 early investor who we made -- DeMorgan actually
17 made a deal with this person, Rob, his name was
18 Rob, in terms of funding DeMorgan and us moving to
19 the UK and for Craig to be doing IP work.

20 Q. Okay. Now, if you would go back to
21 -- by the way, do you know when the conversations
22 or negotiations with Ira began?

23 A. If I had to guess I would say some
24 time in 2015, but I am not 100% sure.

25 Q. When -- let us go to -- if you go

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2 back to tab 23, which has already been marked as
3 an exhibit to the deposition. What number does it
4 have on that?

5 A. 8.

6 Q. So we are talking about exhibit 8,
7 thank you so much. This was the DeMorgan IP deed
8 of assignment. Do you recall that?

9 A. I recall you and I having a
10 conversation about this.

11 Q. Sure, that is all I am asking at
12 this point. Can you go to page 3 of that
13 document?

14 A. Yes.

15 Q. I am focused on paragraph (d), do
16 you see that?

17 A. Hmm hmm.

18 Q. "It is noted that although the
19 contract with W&K Info Defence Research LLC" --
20 that is what we have been referring to as W&K,
21 correct?

22 A. I don't know, I do not know how
23 many W&Ks are there, I really don't.

24 Q. Okay.

25 A. I have noticed there are several

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2 actually, so there is W&K Information Defence
3 Research, there is W&K ID, is there just something
4 called W&K? I do not know of -- I am sure they
5 are separate, I do not think they are all one
6 entity.

7 Q. You don't think W&K ID is short for
8 W&K Information Defence, that doesn't make sense
9 to you?

10 A. I don't know. I didn't set this up
11 so I don't know.

12 Q. Which one did you think was Dave
13 and Lynn's company, then? Which one are you
14 talking about?

15 A. Definitely W&K, but is it W&K
16 Information Defence? I am sure it is W&K
17 Information Defence. I did not realise it has a
18 Research and an LLC at the end, so I do not know.

19 Q. You don't know in this document if
20 this is the one that is a company associated with
21 Dave Kleiman?

22 A. I can only assume because there is
23 a W&K in there, but I don't know.

24 Q. This document talks about a lawsuit
25 that was filed against W&K Information Defence --

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2 a Statement of Claim, I will use the proper
3 terminology.

4 A. Yes.

5 Q. You know that your husband brought
6 a lawsuit or a Statement of Claim against W&K
7 Information Defence; you know that, don't you
8 ma'am?

9 A. I know that he did something,
10 I didn't realise it was a lawsuit. It is called a
11 Statement of Claim, which is quite different.

12 Q. Well, we can debate whether it is
13 different. What he did was, is he made a claim in
14 the courts in Australia saying that W&K
15 Information Defence owed him a whole lot of money,
16 did he not?

17 A. I don't know, I wasn't there.

18 Q. You weren't there when?

19 MS. McGOVERN: Object to the
20 form ----

21 BY MR. BRENNER:

22 Q. This is your time, what do you mean
23 by you were not there?

24 MS. McGOVERN: If you could stop.
25 I need a beat between the question and answer,

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2 particularly these kind of questions. I am going
3 to object to the form on this question and the
4 prior question.

5 BY MR. BRENNER:

6 Q. Okay, you can answer?

7 A. I was not there at the court with
8 him.

9 Q. So as you sit here today you do not
10 nose that your husband brought a Statement of
11 Claim against W&K Information Defence for tens of
12 millions of dollars; that is something that you
13 don't know?

14 A. I know that he brought a Statement
15 of Claim against W&K.

16 Q. You know he got what is called a
17 default judgment against them, meaning he got the
18 court to award him a tremendous amount of money
19 from W&K; your know that don't you, ma'am?

20 A. I know that he got a default
21 judgment, yes.

22 Q. Right, and he used that default
23 judgment to take all of W&K's intellectual
24 property, you know that too, don't you ma'am?

25 MS. McGOVERN: I am going to

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2 object.

3 MR. BRENNER: You just did, that is
4 enough, thank you.

5 MS. McGOVERN: I ----

6 MR. BRENNER: No. You want to send
7 the witness out?

8 MS. McGOVERN: Slow down ----

9 MR. BRENNER: Send the witness out,
10 please.

11 MS. McGOVERN: (Unclear).

12 MR. BRENNER: Send the witness out,
13 please. Send the witness out, please. I am not
14 letting you object in front of this witness. I am
15 not letting you do it. Period, end of story. If
16 you want to make a speaking objection we will send
17 the witness out.

18 MS. McGOVERN: I just want to
19 object.

20 MR. BRENNER: Good. Objected.

21 BY MR. BRENNER:

22 Q. Ma'am, you know that, based on that
23 default judgment, your husband obtained all of the
24 intellectual property that was owned by W&K
25 Information Defence; isn't that correct?

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2 A. No, that is not correct at all.

3 MS. McGOVERN: Object to the form.

4 BY MR. BRENNER:

5 Q. What is incorrect about it?

6 A. Well, my husband does a lot of
7 things for the company, or through the company
8 with the company, so I don't have all the details.
9 I know that he had a Statement of Claim and I know
10 that he had a default judgment, and he hasn't gone
11 into details about everything else.

12 Q. But this is your company, this is
13 the Morgan Wright family trust. How did it get
14 W&K's information (unclear) how did your company
15 DeMorgan get W&K's intellectual property which you
16 are assigning in paragraph 8; how did they get it?

17 A. I don't know, I don't have any come
18 economy any records in front of me. If I did have
19 it in front of me I might be able to tell you. If
20 I had access to my company secretary and had all
21 my records I would be able to tell you. You are
22 just telling me things now that supposedly
23 happened and I do not have any of those records.

24 Q. You do not know that?

25 A. Sorry?

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2 Q. You do not know that; this is
3 something that you claim not to have knowledge of;
4 correct?

5 A. What exactly do I claim not to have
6 knowledge about?

7 Q. That your husband and his companies
8 got all of W&K's intellectual property vis-?-vis a
9 Statement of Claim he filed in Australia. You
10 know that ----

11 A. I said that I know he had a
12 Statement of Claim, and I know that he had a
13 default judgment. Now, in the company records
14 there are so many assignments, there are so many
15 different assignments from different companies.
16 I couldn't say to you, I know this happened and
17 I do not know this happened. I really couldn't.
18 If I could have access to my company secretary and
19 if I had everything directly from them I would go
20 through the list and say, "oh yes, this did happen
21 because this was accounted for, or that happened
22 because that was accounted for". Now you are
23 asking me do I or do I not know. I don't even
24 know if I can answer that question because I do
25 not have any records in front of me.

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2 Q. Is there anything that I or my
3 client or my colleagues have done to prevent you
4 access to your records?

5 MS. McGOVERN: Object to the form.

6 MR. SAOUL: You are asking a
7 question based on a document that was provided
8 this morning. The witness has explained what she
9 is able to answer based on her knowledge as she
10 sits here. She is not alleging that anyone on
11 your side has withheld documents, she is simply
12 answering your question.

13 MR. BRENNER: I just said that.
14 The answer said "if I could get access". I want
15 to know if she is claiming anyone is preventing
16 her.

17 MR. SAOUL: She is sitting in a
18 room with the documents you have provided, not
19 with her records in front of her. It is obvious
20 what the answer is.

21 MR. BRENNER: Okay.

22 BY MR. BRENNER:

23 Q. Do you agree with your counsel's
24 statement?

25 A. I do.

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2 MR. BRENNER: Let's take a break.

3 THE EXAMINER: It is now 4.38 in
4 Britain, so if we take a break for five minutes
5 this time, unless anybody needs longer.

6 (A short break off the record
7 from 4.38 to 4.47 p.m.)

8 THE COURT REPORTER: We are going
9 back on the record at 4.47.

10 BY MR. BRENNER:

11 Q. Miss Watts, I just want to follow
12 up on the very last thing we were talking about,
13 which is at -- or at least partly talk about
14 authentic and inauthentic documents. Okay?

15 A. Sure.

16 Q. You made a reference a few times,
17 that if you could see your corporate records you
18 would be able to answer with better clarity some
19 of the things I have asked you to today; is that
20 true?

21 A. I believe so, yes.

22 Q. And you told me today that although
23 you have referenced your corporate secretary on a
24 few occasions, you do not know who that is;
25 correct?

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2 A. I don't know the name of the
3 corporate secretary, they are in Brisbane.

4 Q. Okay. Do you know how to contact
5 them?

6 A. So, my secretary used to do that,
7 my assistant used to do that. I could find a way
8 of contacting my assistant, but I haven't
9 contacted her in five years.

10 Q. You haven't contacted your
11 assistant in five years?

12 A. Yes, this was the companies in
13 Australia.

14 Q. As you sit here today, you would
15 not now know how to get in contact with the
16 corporate secretary that you have referenced? Is
17 that fair?

18 A. I don't know. I think I would have
19 to try and find the search, I might be able to,
20 I don't know. I haven't tried.

21 Q. Are you aware of any accusations
22 that have ever been made that DeMorgan Ltd
23 submitted false documents to the Australian Tax
24 Office; are you familiar with that allegation?

25 A. I am familiar that the Australian

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2 Tax Office might have mentioned that, but the
3 thing is we were actually hacked, so I would not
4 be surprised if some of our staff changed some of
5 our documents.

6 Q. Documents that were submitted by
7 the Australian Tax Office; is it your testimony
8 that if they were false it was someone else that
9 did it?

10 A. Well, I certainly didn't do it.

11 Q. What about your husband?

12 A. He would doubt very much that he
13 would have done something like that.

14 Q. Who is Andrew Sommers?

15 A. He was our lawyer in Australia.

16 Q. Do you trust him?

17 A. I don't know him personally. He is
18 a lawyer.

19 Q. Do you remember the name of his law
20 firm?

21 A. Clayton Utz.

22 Q. Did they Clayton Utz represent
23 DeMorgan in connection with -- well, did Clayton
24 Utz ever represent DeMorgan Limited?

25 A. I do not know if he represented the

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2 companies, I actually really don't know the
3 relationship whether he represented Craig
4 personally, or represented the companies. It
5 probably was the companies. I am not sure which
6 one in particular.

7 Q. Okay. If you could go to tab 32.
8 Let me know when you are there?

9 A. Yes.

10 (Exhibit 10 marked for identification)

11 Q. Miss Watts, do you see what I have
12 marked as exhibit 10?

13 A. I do.

14 Q. Is that a letter from Clayton Utz?

15 A. Yes.

16 Q. Is it an authentic letter?

17 A. I do not know, but I recognise it.

18 Q. It is e-mailed to you; correct?

19 A. Yes.

20 Q. As a director of what company?

21 A. As a director of DeMorgan.

22 Q. It has your e-mail address, was
23 that your Hotwire e-mail address?

24 A. Its was, but we worked across
25 several companies, as I said to you before.

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2 Q. Sure. I am just saying that that
3 was a correct e-mail address for you; right?

4 A. Yes.

5 Q. Does that refresh your
6 recollection that Clayton Utz was representing
7 DeMorgan Limited?

8 A. It does now, yes.

9 Q. Okay, very well. Does it refresh
10 your recollection that at some point in time
11 Clayton Utz determined that they could no longer
12 represent DeMorgan Limited?

13 A. Yes.

14 Q. And the reason that Clayton Utz
15 informed you that they could no longer represent
16 DeMorgan Limited is that your husband had provided
17 documents that lacked integrity to both the law
18 firm and the Australian Tax Office?

19 MR. SAOUL: No, the document says
20 "raises serious questions".

21 MR. BRENNER: Alright, let's do it
22 that way.

23 BY MR. BRENNER:

24 Q. Did Clayton Utz determine that the
25 documents that your husband has submitted both to

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2 its office and to the Australian Tax Office had
3 serious questions about their integrity?

4 A. That what it says here, but I also
5 had a phone call with Andrew, because before he
6 sent me this letter, he called me.

7 Q. And what did he tell you?

8 A. Pretty much the same as this
9 letter, but he said, "I was going to send you this
10 letter", he said that the ATO contacted him saying
11 that there were some documents that had been
12 modified. He said he didn't believe Craig did it
13 at all, because we had already told me that we had
14 been hacked. He said, "but I am under instruction
15 not to be able to represent you because it does
16 not look good for my company". He was hugely
17 apologetic.

18 Q. Right. The company, Clayton Utz,
19 was not only concerned that there were questions
20 about the integrity of documents submitted to the
21 Australian Tax Office, but also documents that
22 were submitted to the law firm; correct?

23 A. Well, that is not what he told me.
24 I know that is what was written here, and he said
25 "I will be sending you a letter that is quite

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2 standard and it is going to sound awful, but this
3 is my position, because I have been told from the
4 top".

5 Q. Does this seem like a standard type
6 letter to you?

7 A. Well, I don't know, I have never
8 written a letter from a law firm before.

9 Q. Let me ask you some questions
10 specifically about conversations you had with your
11 husband, okay?

12 A. Sure.

13 Q. Has your husband ever told you that
14 he was the creator of Bitcoin?

15 A. Yes, before he was my husband, yes.

16 Q. When did he say that?

17 A. Probably late 2010, 2011, shortly
18 after we started going out together.

19 Q. What did he tell you?

20 A. "I created" -- I think he called it
21 "a digital cash and it's called Bitcoin".

22 Q. Did he tell you whether he worked
23 with anyone else on that?

24 A. No.

25 Q. Did he tell you he did not work

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2 with anyone else?

3 A. No, he said, "I created digital
4 cash, it's called Bitcoin".

5 Q. Did he tell you anything else about
6 his creation of Bitcoin?

7 A. Yes, he said he's been working on
8 it for 20 years.

9 Q. Did he tell you anything else?

10 A. He told me a lot of things. He
11 said it was a very long process, that he has --
12 I think at that time he was working on a Masters
13 or was going to work on a Masters -- oh, no, I
14 think or had worked on a Master that had very
15 similar things to Bitcoin and that is where he got
16 all his ideas from; he had been working on it for
17 20 years. Yes, it was just a long, drawn out
18 process. I think it started when he was in his --
19 I don't know, 20s even.

20 Q. What did he tell you, if anything,
21 about Satoshi Nakamoto?

22 A. Then he didn't and I hadn't even
23 heard of the name Satoshi Nakamoto.

24 Q. When did you first hear that name?

25 A. I don't remember. I think I was

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2 reading some information online probably and I put
3 two and two together, that if he created Bitcoin
4 and if Satoshi Nakamoto created Bitcoin, then he
5 had to be Satoshi Nakamoto.

6 Q. The first you learned that he was
7 Satoshi Nakamoto was what you were able to put
8 together, as opposed to him telling you?

9 A. He told me when we were married
10 some time that he was actually Satoshi Nakamoto,
11 but he told me that he created Bitcoin way before
12 we were married.

13 Q. What did he tell you about his
14 dealings with Dave Kleiman?

15 A. He said Dave was his best friend.

16 Q. Anything else?

17 A. Yes, that he was a shoulder to cry
18 on, he was someone who actually understood him, he
19 listened to him, he didn't judge him. He said
20 some lovely things about Dave. He also said that
21 he was not well, I think, that he was in and out
22 of hospitals, but when he was great he was
23 fantastic and when he was not, you know, Craig
24 said he wished he could do more for him, but Dave
25 didn't often say very much when he wasn't well, so

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2 Craig didn't know.

3 Q. Before the break we had talked
4 about a contract with Dave with your husband,
5 regarding some work that ended up not being
6 completed prior to Dave dying?

7 A. That's right, yes, with Coin-Exch.

8 Q. With Coin-Exch, thank you. Did
9 your husband tell you any other work he ever did
10 with Dave Kleiman?

11 A. Yes, he said he wrote some books
12 with him, he edited some of his papers. That is
13 mostly it.

14 Q. Did he tell you whether they ever
15 mined Bitcoin together?

16 A. No.

17 Q. That is a bad question. Did he
18 talk to you at all about the subject, meaning
19 whether and he Dave mined Bitcoin together, or did
20 he tell you that they did not?

21 A. He never told me either way.

22 Q. Okay. Who is Ritzela DeGracia?

23 A. Oh, I recognise the name. I don't
24 know. Is -- he could be a lawyer from -- he might
25 be one of the people from HighSecured, I do not

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2 know, I don't recall. I just remember the name.

3 Q. Do you ever remember any of the
4 discussions with Craig about Ritzela DeGracia?

5 A. I don't remember who that person
6 is.

7 Q. Did you have any discussion with
8 Craig about W&K Info Defence?

9 A. Yes, I did ask him what it was,
10 what W&K, was because I wasn't involved in it.

11 Q. And what did he say?

12 A. He said it was Lynn's company with
13 Dave.

14 Q. Did he tell you what they did, what
15 that company did?

16 A. He might have, I don't remember.

17 Q. Can you tell me what Craig told you
18 about Tulip Trading?

19 A. He told me that he had bought
20 Bitcoin and Tulip Trading held the bought Bitcoin.

21 Q. Is that what Tulip Trading did, was
22 it a company that was going to buy and either hold
23 and sell Bitcoin; is that what Tulip Trading was?

24 A. It didn't sell Bitcoin, it bought
25 and it held the Bitcoin.

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2 Q. But it did use some of the Bitcoin,
3 we went through that before, for various projects;
4 correct?

5 A. For some of the work projects, yes,
6 but it did not sell it for cash, I do not think.
7 I don't know. I wasn't -- I don't know.

8 Q. What about Wright International
9 Investments, what did Craig tell you that was?

10 A. He told me it was a company that he
11 started, and I don't remember what year. I think
12 it was 2009 but I am not exactly sure. Then it
13 held the mined Bitcoin.

14 Q. Anything else that he told you?

15 A. I don't recall off the top of my
16 head, I don't know whether it has IP, I do not
17 know.

18 Q. Okay. Have you already told me
19 everything Craig told you regarding the formation
20 and purpose of the Tulip Trust, or is there more?

21 A. I am not sure. That is a very
22 general question. Do you have a very specific
23 question? If you can ask me a specific question
24 I will answer it specifically. I do not know if I
25 have told you everything because I do not recall

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2 everything off the top of my head. When you ask
3 me a question I might remember it.

4 Q. What did Craig specifically tell
5 you was the purpose of the Tulip Trust?

6 A. The purpose of the trust was to
7 continue the research that he had started on
8 Bitcoin and to promote the legal nature of
9 Bitcoin. As I said, in 2010 or 2011, I don't
10 know. When we found out that the Bitcoin was used
11 for nefarious purposes like drugs and money
12 laundering he was very, very upset. He said that
13 was never the way it was intended. He didn't want
14 it -- people were claiming that it was supposed to
15 be anonymous, and he said Bitcoin was never, ever
16 meant to be and anonymous and never meant to be
17 used on the black net or dark net, or whatever it
18 was called. He said the trust's -- the sole
19 purpose of the trust really was to continue the
20 work of what he had been doing, but in a totally
21 legitimate and legal way, so that Bitcoin was to
22 be used, you know, so people could use Bitcoin,
23 but legitimately, not illegally and not
24 anonymously at all.

25 Q. Denis Mayaka, who we talked about

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2 before, did you come to know him through your
3 association with Craig or in some other way?

4 A. Through Craig, yes.

5 Q. Did Craig know him before you knew
6 him?

7 A. I believe so, yes.

8 Q. Okay. What did Craig tell you
9 Mr. Mayaka -- about why Mr. Mayaka played a role
10 in the trust?

11 MS. McGOVERN: If I could just
12 interject, Magistrate Reinhart has asked
13 plaintiff's counsel to refer to Craig as
14 Dr. Wright (unclear) respect during this
15 deposition as well.

16 MR. BRENNER: I am doing my best.
17 I will go back to it, but sure. Let me reframe
18 the question.

19 BY MR. BRENNER:

20 Q. What did Dr. Wright tell you about
21 Mr. Mayaka and his role in the trust?

22 A. He said he was a lawyer. I am not
23 quite sure which law firm he represented. He did
24 tell me, I cannot remember, and that he was a
25 trustee.

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2 Q. Now, the Tulip Trust, if we to look
3 at the 2017 document, the Tulip Trust holds either
4 directly or indirectly all of the assets that your
5 family has; correct?

6 A. So, what was the question, the
7 Tulip Trust holds?

8 Q. Yes, either directly through shares
9 in other companies -- or indirectly through shares
10 and companies, or directly holds all of the assets
11 that your family has; correct?

12 A. No, that is not correct at all. I
13 have other assets, I have my own savings.

14 Q. Okay, other than your own savings,
15 all of the assets, whether it be in through prior
16 trust, any asset your husband has, is all held
17 directly or indirectly through the Tulip Trust;
18 correct?

19 A. I believe so, yes. I think what he
20 had told me was that the mined Bitcoin was
21 actually in a previous trust that he had called
22 Craig Wright R&D.

23 Q. That mined Bitcoin ultimately got
24 into Wright International Investments; correct?

25 A. Yes. I am not sure how the

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2 transfer was made.

3 Q. Now it is owned, Wright
4 International Investments is owned by ----

5 MR. SAOUL: Mr. Brenner, I am sorry
6 to interrupt you, I just want to check that the
7 question you asking is what you mean it to be.
8 Because whether one is talking about Dr. Wright's
9 assets or Miss Watts' assets, that is a very broad
10 concept. That includes the television on the
11 table, furniture. Do you mean business/crypto
12 currency related assets and intellectual property,
13 or do you really mean all assets?

14 BY MR. BRENNER:

15 Q. Well, let's go back to the 2017
16 Tulip document, so we can verify what it is. On
17 33, was it, go to page 15. Do you see that?

18 A. Yes.

19 Q. Describe that -- schedule A is
20 describing the property in the trust; correct?

21 A. That is correct.

22 Q. It is all the shares in Wright
23 International; correct?

24 A. Yes.

25 Q. All the shares in Tulip Trading;

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2 correct?

3 A. Yes.

4 Q. The mined Bitcoin and the purchased
5 Bitcoin. Correct.

6 A. So the mined Bitcoin was in Wright
7 International and the purchase one was in Tulip
8 Trading.

9 Q. Then it says everything that was in
10 the 2014 formalised trust known as the Tulip
11 Trust, that is the predecessor to this document;
12 right?

13 A. Yes.

14 Q. It says, "All assets in CSW R&D" --
15 that is Craig Wright R&D; correct?

16 A. That's right.

17 Q. Then it says JBURK Limited. What
18 is that?

19 A. It is a company that we have, it is
20 just a holding company, it doesn't do anything at
21 the moment.

22 Q. Okay. Then it says nChain Limited?

23 A. Yes.

24 Q. It says for that, all the assets --
25 asset shares held in trust for Ramona Ang calling

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2 itself DeMorgan; do you see that?

3 A. I do.

4 Q. So was there a sale of DeMorgan at
5 some point?

6 A. So DeMorgan wasn't actually sold.
7 So DeMorgan's IP was rolled into the company that
8 Craig formed with Rob McGregor and his entity, so
9 I suppose now it is called nChain. I don't know
10 what it was called before.

11 Q. Okay. So nChain, either by
12 purchase, or assignment, or something, obtained
13 intellectual property from DeMorgan Ltd?

14 A. It did, yes.

15 Q. In exchange for that you got shares
16 in nChain?

17 A. No, that is not correct. I haven't
18 received any shares in nChain.

19 Q. According to the trust document you
20 were supposed to; correct?

21 A. No, I think this really means if I
22 do, or when I do it will be in here, but I haven't
23 received any yet.

24 Q. You have an expectation that you
25 will?

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2 A. No, I do not know. Actually
3 I really don't know.

4 Q. Then the last thing says, "All
5 trust and assets ever owned by Craig Wright until
6 the formation of this trust".

7 A. Yes.

8 Q. My other point, where we got onto
9 this, the trust is it holds -- to take your
10 counsel's point, it may not own the pen that is on
11 your living room counter, but other than your
12 personal assets, it owns all of the family's
13 assets; correct?

14 A. Well, so the trust owns shares in
15 two -- in all these companies really, so it is
16 one, two -- three companies currently.

17 Q. Well, it is three companies, plus
18 all other assets ever owned by your husband;
19 right?

20 A. That is what it would say, yes. So
21 the trust owns shares in those companies though,
22 yes.

23 Q. My point is, how is Denis Mayaka --
24 why is Denis Mayaka trusted to be what you call
25 the co-trustee for all of the assets for your

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2 family; how did that come to be?

3 A. Well, I don't know. I mean, Craig
4 knew him before, he must trust him. He is a
5 lawyer.

6 Q. Do you trust him?

7 A. I don't know him personally, I am
8 not friends with him, but he is a lawyer. It is
9 like asking me whether I trust any of my lawyers,
10 or it is like asking Ira if he trusts you. I
11 mean, what would the answer to that be?

12 Q. I don't know. I will ask after the
13 phone call. I guess my question is, it is a
14 little more than I am asking you. Do you trust
15 Denis Mayaka to be the co-steward of all of the
16 assets for you and your children?

17 A. Yes. I mean, he has a fiduciary
18 duty. You have a duty as a trustee to ensure that
19 the trust actually follows the rules. Everything
20 that is within the terms of the trust. It is a
21 job.

22 Q. Okay. You mentioned before that
23 Wright International Investments mined Bitcoin;
24 right?

25 A. No, I never said that at all.

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2 Q. I am sorry, Information Defence
3 mined Bitcoin; correct?

4 A. I did.

5 Q. And then that Bitcoin then was --
6 became owned by Wright International Investments.
7 Do I have that right?

8 A. Yes.

9 MS. McGOVERN: Object to the form
10 of the question; asked and answered.

11 BY MR. BRENNER:

12 Q. Okay, just clarifying. When --
13 Information Defence is a company, right?

14 A. Yes.

15 Q. Who was actually mining the Bitcoin
16 for Information Defence?

17 A. I don't know, I wasn't there in
18 2009.

19 Q. Was it your husband?

20 A. I wasn't there in 2009.

21 Q. Did your husband ever tell you who
22 mined that Bitcoin?

23 A. He might have. I actually don't
24 remember because I wasn't there. I was ----

25 Q. I am asking when you were there,

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2 after you became affiliated with your husband,
3 first professionally as then as his wife, did he
4 ever tell you who mined that Bitcoin?

5 A. He has always told me that
6 Information Defence mined the Bitcoin.

7 Q. Did you have an understanding of
8 who ran Information Defence?

9 A. No.

10 Q. You don't know if it was your
11 husband?

12 A. No.

13 Q. Do you know if it was Dave Kleiman?

14 A. No.

15 Q. Were you involved in your husband's
16 disputes with the ATO?

17 A. As I was director of DeMorgan,
18 I answered a lots of the questions. I don't know
19 what you mean be "involved with". We had a lot of
20 audits done so I had to deal with the ATO, in
21 terms of answering questions and when we were
22 audited.

23 Q. I will use the word "dispute", and
24 if you think it is bad you will tell me, but the
25 disputes with the ATO, were those something that

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2 was initiated by the ATO, did your husband seek
3 out things from the ATO which ended up leading to
4 these disputes?

5 A. I think, from what he has told me,
6 that they started very early on, when the tax
7 office had said that what he was doing, in terms
8 of the companies researching Bitcoin were not
9 viable companies, they were not enterprises.
10 I think that is how it started. Because they said
11 that Bitcoin research was a hobby, and if it is a
12 hobby, then the companies that you form
13 researching Bitcoin is actually not an enterprise.
14 I think they were trying to strike that down.
15 That is really what the problem was.

16 Q. Let me see if I tell you my
17 understanding and you tell me if it is wrong?

18 A. Sure.

19 Q. Your husband went to the Australian
20 Tax Office because he wanted certain tax credits
21 associated with companies that had mined Bitcoin.
22 Is that right?

23 A. That is not how I see it. As
24 I said, in Australia you -- there were lots of
25 different forms that we were filling out, but you

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2 had to say you were an enterprise and what you
3 were doing. I remember we filled out tons of
4 forms, and we had developers, and our financial
5 controllers stating that this is what we are
6 doing, it is research in Bitcoin. The Australian
7 Tax Office came back and said, well, that is a
8 joke, because it is a hobby, it is not a real
9 enterprise. So, really, in a way they were trying
10 to shut all the companies down immediately.

11 Q. Did your husband ever tell you that
12 Dave Kleiman was his partner?

13 A. He -- Craig has used the term
14 partner very, very loosely.

15 MS. McGOVERN: Object to the
16 question. We have gone over this in the morning
17 session; asked and answered.

18 BY MR. BRENNER:

19 Q. You can answer.

20 A. So as I said, Craig has used the
21 term partner very, very loosely. I think he would
22 consider his best friend his partner. Dave did a
23 lot of editing for him, I think he would say,
24 "Hey, that is my partner who has edited my book
25 for me, we have written a book together". I think

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2 he would consider that a partner too. So it
3 depends on what you mean by partner.

4 Q. Excuse me, did your husband ever
5 tell you that Dave was not his business partner?

6 A. Well, Craig never said to me, "Just
7 to let you know Dave is not my business partner".
8 He has never actually said that to me to my face,
9 no.

10 Q. Okay. Let's talk about the
11 negotiations with Ira, okay?

12 A. Sure.

13 Q. It started off -- just to reset,
14 because we got a little far afield -- initially
15 there was a contact between your husband and Louis
16 Kleiman regarding potential shares in Coin-Exch
17 for the estate of Dave Kleiman; right?

18 A. So can you say that again, I didn't
19 hear you.

20 Q. Sure. I am just trying to reset
21 where we were. You told me earlier that there was
22 a contact some time after Dave passed away between
23 your husband and Louis Kleiman, where your husband
24 was trying to get certain shares in Coin-Exch to
25 Dave's estate after his death?

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2 A. That is correct, yes.

3 Q. Okay. Then at some point Ira
4 became involved in the negotiations. You are not
5 sure if it was because of his father dying, but at
6 some point his father passes away and Ira is
7 involved in the negotiations?

8 A. That is correct.

9 Q. Explain to me what were those
10 negotiations; what was being negotiated?

11 A. I don't really have all the
12 details. I think it started off with Craig saying,
13 "I've got -- your brother's got shares" or to --
14 so Dave's father, it would be, "Your son has
15 shares in this company and we'd like you to have
16 that". I don't have all the conversation in front
17 of me. I think it got to a stage where Ira came
18 in and said basically if they were to sell it, how
19 much? I know we offered Ira the directorship,
20 because Dave was also supposed to be a director of
21 Coin-Exch we had offered that to Ira and he said
22 "Well, I don't want that directorship. How much
23 is the shares worth? Can we sell it, and can
24 I have some money, and just make sure that I don't
25 have to pay tax on it".

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2 Q. Okay. When you and your husband
3 were in contact with Ira Kleiman, by that point,
4 which we just went over in a previous document, by
5 that point your husband had already filed his
6 Statement of Claim against W&K; correct?

7 A. I don't remember when he filed it
8 and I don't remember when we started talking to
9 Ira.

10 Q. Okay, do you know when you were
11 negotiating, and I said you both you and your
12 husband, whether you were negotiating with Ira
13 whether either of you told him there had been a
14 Statement of Claim filed against W&K in Australia?

15 A. I didn't. Craig might have, I do
16 not know.

17 Q. In those discussions were you or
18 your husband asking Ira for anything in return, or
19 were you just trying to give him shares -- in
20 coin -- I am going to ask that again. It was a
21 bad question. I understood from a previous answer
22 that the shares we are talking about, that
23 originally your husband wanted to get to the
24 estate through Louis Kleiman, and then discussions
25 with Ira, were shares in Coin-Exch; is that right?

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2 A. That is correct.

3 Q. When you spoke with Ira and
4 communicated with Ira, both you and your husband,
5 were you asking anything from him in exchange for
6 giving him those shares?

7 A. I wasn't, I don't know if Craig
8 did. I do not think he did at all.

9 Q. You don't recall asking for his
10 cooperation in the Australian Tax Office
11 proceedings?

12 A. Oh, I suppose at the end when they
13 were asking questions I might have. I don't
14 remember. I might have.

15 Q. Why did you and your husband need
16 to negotiate with Ira if you were just going to
17 give him shares? I don't understand the
18 negotiation.

19 A. Because he didn't actually want the
20 shares. So he wanted the money. So the
21 negotiation was really, how much is it worth? So
22 we offered him a figure, he said that that was not
23 enough. We offered another figure and he said,
24 "Well, that is not enough". It was not shares
25 that he wanted, he wanted the money and he wanted

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2 it right away.

3 Q. From your counsel and through your
4 husband's counsel, you all have produced e-mail
5 exchanges with Ira, so I have that stuff. Before
6 I get into those, can you let me know, because
7 I don't have a way to know verbal conversation,
8 let me know what Ira said to you that is not
9 otherwise captured in the e-mails?

10 MS. McGOVERN: Object to the form.

11 MR. SAOUL: Can I ask you to be a
12 little more specific? Are there -- perhaps you
13 could ask your questions by reference to specific
14 issues.

15 BY MR. BRENNER:

16 Q. I am asking about the negotiations,
17 I have the e-mails I want to know what was taking
18 place that I would not see in the e-mails about
19 those negotiations?

20 A. I think we had some Skype calls.
21 I just remember not having a very good impression
22 of Ira after some conversations I had with him.

23 Q. Okay. Do you remember anything --
24 I am not asking for exact words. I am asking if I
25 look at the e-mails, will I capture in sum and

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2 substance what the negotiations were, or are there
3 things I am missing if I do not ask you what you
4 guys talks about?

5 MS. McGOVERN: Object to the form.
6 As to the e-mails are you asking as to the
7 e-mails.

8 MR. SAOUL: I am going to make the
9 same objection from the English point of view. We
10 have not gone through the e-mails, so it may be
11 more helpful to go through the e-mails first and
12 see if there are any gaps.

13 MR. BRENNER: No. I have time
14 limitations. There are lots of e-mails, many of
15 which when we go through them we are told they are
16 not real, so I cannot really do that, although I
17 would love to. So I need to ask the question, in
18 the way I need to ask. It is pure discovery in a
19 US court proceedings, it is a perfectly valid
20 question. So let me ask it again.

21 MS. McGOVERN: I am going to object
22 to that statement, with respect to the
23 representation about the e-mails, that that is not
24 an accurate representation in this deposition.
25 I am going to object to the questions about

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2 documents that I have not seen yet.

3 MR. BRENNER: I have not asked the
4 question. Amanda, please just object to form.
5 I don't even know what you are doing right now.

6 BY MR. BRENNER:

7 Q. Miss Watts, tell me your
8 discussions with Ira, not your e-mails, tell me
9 your discussions with Ira in the negotiations that
10 you have described here?

11 A. So I don't actually remember them,
12 they were so many years ago I don't actually
13 remember them. I remember the sentiment, that is
14 all.

15 Q. That is great, what was the
16 sentiment?

17 A. He just wanted money, and he wanted
18 more money, and more money. He wanted it now, he
19 didn't want to be a director, he wasn't interested
20 in what Coin-Exch was doing, and he was very
21 specifically when he said "I don't want to pay
22 tax". I remember that because Craig was very,
23 very, very angry when Ira said that.

24 Q. Okay. Anything else about the
25 sentiment that you can remember, other than -- we

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2 will go through some e-mails that I have, but
3 anything else?

4 A. That was the final sentiment.
5 Initially when we started it was very cordial and
6 very pleasant.

7 Q. Okay. Then ultimately I think you
8 told me you ultimately -- those conversations
9 ultimately led to you to not view Ira favourably?

10 A. At the end. At the beginning not
11 so at all. At the beginning he was perfectly
12 charming.

13 Q. Let me direct your attention to,
14 let us find the tab, tab 7?

15 (Exhibit 11 was marked for identification)

16 Q. Miss Watts, are you there?

17 A. Yes.

18 Q. Just to make sure, because we are
19 not in the same room, is tab 7 a one page
20 document?

21 A. It is, that is right.

22 Q. Let us go through this a bit and at
23 the beginning let's just identify who the players
24 are. The e-mail on the top is from Craig Wright,
25 that is Dr. Wright, we talked about him; correct?

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2 A. Yes.

3 Q. Second one is C -- the second
4 person which is in the 2 is C, and it says that is
5 a person with the e-mail address C@██████████ That
6 is Calvin Ayre; correct?

7 A. Calvin Ayre, I believe so, yes.

8 Q. Then the next one, that is Robert
9 McGregor, that is the person you said your -- I
10 think you said your husband ended up, when we were
11 talking about nChain, you said he ended up going
12 in to business with Mr. McGregor on some of his
13 entities?

14 A. It is not so much business, there
15 was a DeMorgan service agreement where Rob and his
16 entities, I believe, and Craig formed what is now
17 known as nChain, and so as the agreement was that
18 Craig was to produce a certain number of patents
19 for nChain and DeMorgan in Australia was to be
20 funded.

21 Q. Okay. Stefan Matthews, we talked
22 about him before and that is you, Ramona Watts?

23 A. That is correct.

24 Q. I actually went to the wrong topic.
25 I will see if I can switch. I hate to do this to

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2 you, let us go to tab 17.

3 (Exhibit 12 was marked for identification)

4 Q. Are you there?

5 A. I am.

6 Q. So if you go to the page that has
7 287 on the bottom ----

8 A. Yes.

9 Q. That is -- correct me if I am
10 wrong, that is an e-mail from you to your husband;
11 correct?

12 A. Yes.

13 Q. Are you -- do you recall this
14 e-mail?

15 A. As I said with the other ones,
16 I don't recall writing that five years ago. It
17 looks familiar though.

18 Q. Is this -- it addressed to Ira. Is
19 this a copy of something you had sent to Ira or a
20 draft of what you were intending?

21 A. I don't remember.

22 Q. You write: "Currently we are
23 having major battles with the tax office" -- ATO,
24 the Australian Tax Office, that was a correct
25 statement; right?

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2 A. Yes.

3 Q. "They" -- meaning the tax office --
4 "do not believe that what we have is viable" -- do
5 you see that?

6 A. Hmm hmm.

7 Q. "They do not see it as an
8 enterprise", right?

9 A. Yes.

10 Q. "They are arguing that the work
11 Dave and Craig has been doing is a hobby or purely
12 academic research", right?

13 A. Yes.

14 Q. "Dave and Craig were working
15 together on the issues that we are fighting out
16 with the Australian Tax Office"; is that not true?

17 A. Well, Dave was working on
18 Coin-Exch, he was supposed to be working on
19 Coin-Exch, and Coin-Exch was one of the companies
20 that the Australian Tax Office had audited, so
21 Dave was supposed to be setting up systems for
22 Coin-Exch but ----

23 Q. The fight with the -- I am sorry.

24 A. -- but we only found out much later
25 on that that wasn't done. I was under the

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2 assumption that Dave had been working on
3 Coin-Exch.

4 Q. Actually the fight with the ATO was
5 whether the mining of Bitcoin was a hobby, isn't
6 that true?

7 A. No, no because the fight with the
8 ATO was with all the companies, with any of the
9 companies were enterprises, any of the research
10 that was being done was an enterprise.

11 Q. Okay. Go to second page which has
12 an 88 at the bottom. Just so we are clear, the
13 only thing you have told me before today, before
14 right now, that Dave and Craig did together in a
15 business side, was when Dave helped Craig edit
16 certain papers; right?

17 A. Yes.

18 Q. (ii), he helped him write a book,
19 or was it more than one book?

20 A. I don't know.

21 Q. And (iii), he had this contract
22 with Coin-Exch which he ended up not doing any
23 work on; right?

24 A. That's right, and I have just
25 remembered one, that I was ant part of, but

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2 I remember Craig telling me that they either did
3 or were supposed to do something with -- I think
4 it was the Department of Defence in the US. I was
5 not involved with that one, but I remember Craig
6 telling me about that. So as I said, when you
7 generalise things like that and say, "Tell me
8 everything", I cannot always recall. But if you
9 ask me something very specific I might be able to
10 answer the questions.

11 Q. We will each do our best. In the
12 paragraph starts with, "Currently we need to" this
13 is either a draft of a communication to Ira or one
14 that was sent to Ira, or you are just not sure?

15 A. I cannot remember.

16 Q. The addressee of this, whether it
17 was sent or not, is Ira; correct?

18 A. Yes.

19 Q. You write: "Craig and I" -- you
20 are talking about yourself, right -- "Craig and I
21 have put our entire life savings into this
22 business"?

23 A. Yes.

24 Q. What business was that?

25 A. Everything, everything that we did.

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2 Q. Then read the next three words?

3 A. "As did Dave".

4 Q. Right, "Dave also put his entire
5 life savings into the business", isn't that what
6 you wrote?

7 A. Dave was supposed to put the
8 Bitcoin that he had into Coin-Exch. That was part
9 of the deal as well.

10 Q. Okay, when did you learn that he
11 didn't?

12 A. I think it just wasn't there.
13 I don't know. Craig had told me that it wasn't
14 and then accountants said that it wasn't in there.
15 I don't know.

16 Q. Right. What happened was, after
17 Dave died and Craig -- well I don't want to
18 represent -- after Dave died, Craig recognised
19 that work that Dave was supposed to have done he
20 didn't do; correct?

21 A. I don't know when after he died but
22 it was after he died definitely, I just don't know
23 when.

24 Q. Okay, so this is two years later,
25 and you are telling Ira Kleiman that his brother,

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2 Dave, put his life saving into his business with
3 Dave; isn't that true, ma'am?

4 MS. McGOVERN: Let me just
5 interpose an objection and request Mr. Brenner to
6 refer to Craig as Dr. Wright.

7 MR. BRENNER: You know what, I am
8 instructed to refer to Craig as Dr. Wright in
9 pleadings. The document uses the word "Craig",
10 I do not have to sanitise the document, okay, so
11 no, I am not going to do that. The document says
12 Craig, I am not going to interpose my language in
13 there. The document says ----

14 MS. McGOVERN: That is my
15 objection.

16 MR. BRENNER: You have a standing
17 objection on the Craig/Dr. Wright issue, you don't
18 have to make it again. That stands for this
19 deposition and all others that follow.

20 BY MR. BRENNER

21 Q. It says: "Craig and I have put our
22 entire life savings into this business, as did
23 Dave." That is what you wrote; correct?

24 A. Yes, but, as I said to you before,
25 Dave was supposed to put the Bitcoin that he had

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2 into Coin-Exch, and that is why he got the shares;
3 that and the work that he was supposed to have
4 done. So that was the deal that was with
5 Coin-Exch ----

6 Q. And when he died he -- I am sorry,
7 go on.

8 A. -- so the -- in order to capitalise
9 the company Craig put in a lot of money, or
10 Bitcoin, I am not sure what he did there. And
11 Dave was supposed to put another bit. We only
12 found out much later on from our accountants that
13 that wasn't the case.

14 Q. Ma'am, it is your testimony that
15 two years after Dave died you still didn't -- you
16 were still waiting for his Bitcoin to be
17 deposited; is that your testimony?

18 A. No, my tell is that at that time we
19 probably were running eight companies, and at that
20 time we were being audited constantly on the eight
21 company. I don't know if you have ever run
22 several companies a the same time before
23 Mr. Brenner. It is very stressful, we worked long
24 hours, I had three children that I did not see, we
25 had accountants after accountants. I was not

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2 responsible for the accounting, I had financial
3 controllers and accountants who did that. They
4 would give me the information. If you have a new
5 accountant or a new financial controller sometimes
6 it takes them six months to actually understand
7 the accounts, especially when some of the accounts
8 involve Bitcoin. So if after two years Dave dies,
9 my accountant comes and says to me, "By the way in
10 Coin-Exch I just want to let you know there is X
11 amount here", then I say, "Oh my God, is that what
12 there is?" We had at least eight companies,
13 perhaps even more, at the same time, three
14 children at home, two of us, 50 staff, perhaps
15 even more, being audited day and night by the tax
16 office. I did didn't sleep very much, I worked 18
17 hour days, so did my husband.

18 Q. All I am asking, ma'am, is two
19 years after Dave Kleiman died ----

20 A. And I have answered your question,
21 sir.

22 Q. May I finish my question? Two
23 years after Dave Kleiman died you were writing to
24 his brother, telling him that his brother and
25 Craig had both put their life savings into their

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2 business; isn't that correct?

3 A. The information that I was given
4 from my accountants at that time, and I've believe
5 I must have been on my third, perhaps my fourth
6 accountant, trying to run eight companies, perhaps
7 more, at that one time. Mr. Brenner, if you try
8 working 18 hour days, if you do not have all the
9 information ahead of you.

10 Q. The answer is that what you wrote;
11 correct?

12 A. I am sorry?

13 THE COURT REPORTER: I am sorry,
14 could you repeat that?

15 BY MR. BRENNER:

16 Q. The answer is that is what you
17 wrote; correct?

18 A. The answer is I didn't have all the
19 information at the time.

20 MR. SAOUL: Let us move on, Mr.
21 Brenner.

22 BY MR. BRENNER:

23 Q. Yes. If you could go -- I think it
24 is in same -- which tab are we on, counsel?

25 MR. SAOUL: Tab 17.

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2 BY MR. BRENNER:

3 Q. Okay, so now I need you to go to 3.

4 THE COURT REPORTER: Would you like
5 me to mark the document?

6 MR. BRENNER: Yes, please.

7 (Exhibit 13 was marked for identification)

8 THE EXAMINER: Yes, it is exhibit
9 13.

10 BY MR. BRENNER:

11 Q. Okay, exhibit 13, I think, is a one
12 page document; is that right Miss Watts?

13 A. That is correct.

14 Q. So, I think if we were to do it in
15 time and date order, we would start with Ira
16 writes to you -- it says June 27 at 6.29 p.m.;
17 right?

18 A. That is what it looks here, yes.

19 Q. Yes, although the e-mail above it,
20 which purports to -- it looks like it forwards it,
21 is actually six hours earlier. Is that how you
22 read that?

23 A. Yes, it is very strange.

24 Q. Yes, very strange. Okay, I do not
25 have an answer for you on it, so I don't know.

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2 Just maybe it is one is using eastern time or one
3 is using Australia time, or something.

4 A. I don't know.

5 Q. You are still in Australia at this
6 time, I think, right, until the end of 2015?

7 A. That is correct, yes.

8 Q. So Ira writes to you in June 2015
9 and this is part of the negotiations we have been
10 discussing; right?

11 A. I presume. I mean, I don't -- as
12 I said, five years ago, I do not remember.

13 Q. It says: "Craig originally told me
14 Coin-Exch could make Google look like small
15 potatoes, so why would we want to sell all our
16 shares for possibly nothing?" Do you see that?

17 A. I see what he wrote, yes.

18 Q. So what was happening was, you guys
19 had offered Ira shares in Coin-Exch; correct?

20 A. That is correct.

21 Q. When I say Ira, was it more
22 accurate that you were offering to Dave's estate?

23 A. Yes, it was his estate.

24 Q. Okay. If I say Ira, what I am
25 talking about, sort of as and of the estate,

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2 I will mix it up sometimes, but I will try to --
3 then did there come a time where, in the lieu of
4 the shares, and I think you told me this before,
5 that you guys offered him, or offered the estate
6 money?

7 A. Oh, he asked for money.

8 Q. And did you offer money?

9 A. Yes.

10 Q. You told me you offered one amount
11 and he said it was not enough. Do you remember
12 what that was?

13 A. I really don't remember.

14 Q. Then you offered a higher amount
15 and he still said it wasn't good enough?

16 A. Yes.

17 Q. Okay. Then if you go to the top, I
18 guess you then forward the e-mail to Stefan
19 Matthews; right?

20 A. Its looks like it, yes.

21 Q. Yes, it does. And you said, "Ira
22 considers himself an investor", right?

23 A. That is what is written here.

24 Q. And you are talking about an
25 investor in Coin-Exch; right?

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2 A. I believe so, yes.

3 Q. You say, "He has not put one cent
4 into the business or any amount of time"; right?

5 A. That is correct.

6 Q. Then it says, "Craig will send you
7 the shareholders agreement that Dave signed in the
8 morning."

9 A. Yes.

10 Q. Is there such a shareholders
11 agreement for Craig -- for Dave, in Coin-Exch?

12 A. There must be.

13 Q. Okay. You assume there is because
14 you are reading it in this e-mail?

15 A. Yes, I do not remember.

16 Q. You don't have an independent
17 recollection of it though?

18 A. No.

19 Q. If you could go to ----

20 A. And I don't even know if this Dave
21 is Dave Kleiman, I don't know who it actually
22 refers to. This is the problem, I don't actually
23 remember writing this e-mail. I might have. It
24 was five years ago. We also had a director in our
25 company, in DeMorgan, called Dave as well. There

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2 was a Dave Jensen, so I don't know who this is
3 referring to.

4 Q. Okay. What do you have as tab 1,
5 because I think I amy have a typo on it?

6 MR. SAOUL: So is that a question
7 addressed to me or to the witness, Mr. Brenner?

8 MR. BRENNER: Either one. What is
9 the Bates stamp on tab number 1?

10 MR. SAOUL: So tab 1 is an e-mail
11 chain and the top e-mail is from Miss Watts to
12 Mr. Matthews. Subject is "re: Proposal" ----

13 MR. BRENNER: Okay.

14 MR. SAOUL: -- and the date is 8th
15 July 2015 at 6.29 a.m.

16 MR. BRENNER: Okay, that is what
17 I want it to be. My index has the wrong Bates
18 number. That is why I was asking. Can we mark
19 this as the next exhibit, Madam Court Reporter.

20 (Exhibit 14 was marked for identification)

21 Q. 14 is a one page document, Miss
22 Watts?

23 A. Yes.

24 Q. You have three e-mails on it?

25 A. Yes.

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2 Q. It appears to be -- again I think
3 we may have the Australia problem, from my read of
4 it the oldest one is on the bottom; does that seem
5 right?

6 A. Yes.

7 Q. There is an e-mail from Ira Kleiman
8 to both you and Craig, or Dr. Wright; correct?

9 A. That is correct.

10 Q. This is a point where the
11 negotiations are becoming somewhat strained;
12 correct?

13 A. Yes.

14 Q. And he says -- he makes a demand,
15 he says, for \$US6 million he would sell 90% of his
16 shares; correct?

17 A. That's what it looks like he is
18 saying.

19 Q. And that was 90% of his shares in
20 Coin-Exch?

21 A. Yes, that was the only shares that
22 he had.

23 Q. Then he sets forth some payment
24 terms; correct?

25 A. Yes.

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2 Q. You then take the e-mail and
3 forward it -- excuse me, I take that back -- the
4 e-mail is then -- somehow gets to Stefan Matthews;
5 correct?

6 A. It looks like it.

7 Q. And he says he is laughing to
8 himself for (unclear) responses, he would suggest;
9 right?

10 A. That is what is written here.

11 Q. It is fair to say that was a little
12 bit of a theme in the e-mail exchanges from Ira,
13 that you guys were having a separate discussion
14 behind his back; isn't that fair?

15 A. Well, I don't recall this.

16 Q. Okay. And you write to Stefan: "I
17 am so pleased you have such a mature sense of
18 humour"; right?

19 A. Is what it says in the e-mail.

20 Q. You don't think you wrote that?

21 A. I don't recall.

22 Q. It says it is really getting silly
23 though; right?

24 A. I can see what is written here.

25 Q. Is it fair to say you are sort of

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2 sort of mocking the \$6 million price?

3 A. Well, I am not quite sure why you
4 keep saying is it fair to say that, when I am
5 actually telling you I don't recall writing this
6 e-mail.

7 Q. If you could go to tab 5?

8 (Exhibit 15 was marked for identification)

9 THE EXAMINER: Exhibit 15.

10 BY MR. BRENNER:

11 Q. This is also a one page document?

12 A. Yes.

13 Q. Also an e-mail trail, the top line,
14 which appears to have everything as underneath is
15 from Dr. Wright to Ira, and copied to you?

16 A. That's correct.

17 Q. In this -- at all times, did you
18 and Dr. Wright acknowledge that Dave's estate was
19 entitled to a share in Coin-Exch?

20 A. Yes.

21 Q. And you acknowledge that today;
22 correct?

23 A. Yes.

24 Q. What happened to Coin-Exch, did it
25 get dissolved?

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2 A. It did.

3 Q. Where did its assets go?

4 A. Actually I don't know. I don't
5 know whether it was dissolved or it is in the
6 process of being dissolved. And in terms of
7 whether or not I acknowledge that Dave's estate
8 has shares, or is owed shares from Coin-Exch,
9 I think there was an agreement that Dave would be
10 given shares in Coin-Exch if he had done a certain
11 amount of work, and if he had capitalised the
12 company as he was meant to. So nobody in their
13 right mind, if you think about it, would say,
14 "I am going to give you shares in the company that
15 I am putting my money into. You don't have to do
16 any work by the way, but you can still have shares
17 in that company". So, it really was out of the
18 goodness of Craig's heart that he said, you know,
19 "I think we should do this". But at the end of
20 the day, if he wanted to fight that, and wanted to
21 take that to court and show there with no work
22 done, and that Craig was the only person, or the
23 company was -- the only capitalisation of the
24 company only came Craig and didn't come from Dave,
25 then I think if you were to take that to court you

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2 would see that Dave's estate would not be due any
3 shareholding at all.

4 Q. Let me ask you this. In any e-mail
5 that you recall or any conversation you recall,
6 did either you or your husband tell Ira Kleiman
7 that he was not entitled to shares in Coin-Exch
8 because his brother, Dave, had not done the work
9 agreed upon and/or capitalised the company that
10 was agreed upon?

11 A. I don't actually recall saying
12 that. But, as I said, at the same time we were
13 trying to do the right thing. So Dave was Craig's
14 best friend. Craig said, "Let's capitalise this
15 company, you put X amount, I put X amount, you did
16 this work and I do that work, and you have this
17 shares and I have that shares" and Dave agreed to
18 do it. He didn't do it. He did not capitalise
19 the company. He didn't do any work for the
20 company. So there is the ----

21 Q. How do you know that?

22 A. The accountant told me that there
23 was no capitalisation from Dave, and Craig and the
24 other people working in Coin-Exch said that the
25 work that was supposed to be done, because he was

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2 supposed to do some system administration, was not
3 done. So we actually had to hire another system
4 administrator to do all of the work.

5 Q. But two years later, when you are
6 still offering Dave's estate shares, it is because
7 it is out of the goodness of Craig's heart,
8 Dr. Wright's heart?

9 A. It really was.

10 MS. McGOVERN: Please record
11 objection to the form of the question.

12 BY MR. BRENNER:

13 Q. Who is Patrick Paige?

14 A. I don't know him personally.
15 I think he was a friend of Dave's or a colleague.
16 I'm not sure.

17 THE EXAMINER: We are getting
18 towards another hour since we last stopped.
19 I don't know if it is convenient to stop there, or
20 just finish this question.

21 MR. BRENNER: Well, it is going to
22 be a little bit of a question. We really need to
23 keep the breaks short. We will show the running
24 time at the end, but ----

25 THE EXAMINER: I am conscious the

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2 witness and the court reporter ----

3 MR. BRENNER: Absolutely. If the
4 witness needs a break, absolutely.

5 THE WITNESS: I am okay. If you
6 want to continue, that is fine. I just cannot
7 afford to stay any longer because I have to pick
8 my daughter up.

9 THE EXAMINER: Okay, are you all
10 right, and the court reporter, is she all right?

11 THE COURT REPORTER: I am fine,
12 thank you.

13 THE EXAMINER: Okay, let us carry
14 on then.

15 BY MR. BRENNER:

16 Q. Before we got on the e-mail changes
17 with Ira we had gone to a different document.
18 This should be the exhibit prior to the one, it is
19 -- I will give you the tab, that is a little bit
20 easier. Tab 7. This is exhibit 11, that is a one
21 page document; correct?

22 A. That is correct.

23 Q. So this is an e-mail, the top
24 e-mail is from Dr. Wright to Calvin, Ira, Robert
25 McGregor, Stefan Matthews and you, Miss Watts;

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2 correct?

3 A. That is correct.

4 Q. The discussion in the e-mail,
5 although it is very short, is talking about an
6 e-mail that had actually been sent about almost
7 two years prior; correct?

8 A. It looks like it, yes.

9 Q. Let's look at the one which is two
10 years prior, which is Dr. Wright to Carter and
11 Patrick Paige; okay?

12 A. Okay.

13 Q. Your husband writes: "I know both
14 of you Carter and Patrick new Dave and trusted
15 him"; right?

16 A. That is what is written here, that
17 is correct.

18 Q. Your husband writes: "Dave and
19 I had a project in the US". What was that project
20 ma'am?

21 A. I didn't write this e-mail, I do
22 not know.

23 Q. Okay, you don't know what project
24 that is?

25 A. No.

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2 Q. Okay. It says: "He ran it
3 there" -- meaning Dave ran it there. You don't
4 know what is that referring to?

5 A. No.

6 Q. It says: "We kept what we did
7 secret", do you see that?

8 A. I see it.

9 Q. Do you know what your husband --
10 what project he had with David in the US that they
11 were keeping a secret?

12 A. Well, I didn't write this e-mail.

13 Q. I know you didn't write it. I am
14 not asking if you wrote it, I am asking if you
15 know what project he was saying he and Dave had in
16 the US that they kept secret?

17 A. No, I do not know.

18 Q. It says: "The company he ran
19 there" -- and he is meaning Dave; correct?

20 A. I don't know who he means.

21 Q. "The company he ran there mined
22 Bitcoin." Do you know what company that your
23 husband -- well, do you of a company that Dave ran
24 in the US that mined Bitcoin?

25 A. I do not.

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2 Q. If you go to the next paragraph, it
3 says "the amount DK" -- do you understand that to
4 be a reference to Dave Kleiman?

5 A. I would assume so, but I don't
6 know.

7 Q. "The amount DK mined is far too
8 large to e-mail." Do you see that?

9 A. I see it.

10 Q. Does it refresh your recollection
11 whether your husband ever spoke with you about
12 Dave mining Bitcoin?

13 A. No, he never did.

14 Q. Okay now it goes up at the top, it
15 actually -- this e-mail, two years later, comes to
16 you; right?

17 A. That is what it looks like, yes.

18 Q. It says -- it is from your husband.
19 It says: "The e-mail to Patrick is attached
20 below." Correct?

21 A. That is what it says.

22 Q. It says "I said we mined". You
23 understood that your hand was telling you that he
24 told Patrick that him and Dave mined Bitcoin,
25 don't you ma'am?

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2 A. I don't. I ----

3 Q. But you understand -- I am sorry.
4 Go ahead.

5 A. I really don't like to speculate
6 what my husband meant when he wrote something. As
7 I said to you before, he has Asperger's, he really
8 has trouble expressing himself. So even if he
9 writes an e-mail to me, I will need to see him to
10 his face, get him after ten years to look me in
11 the eye, and say, "Did you mean this, did you mean
12 that?" And half the time he says, "No, that is
13 not what I mean". So you are asking me to
14 speculate on something that he wrote, someone who
15 has trouble expressing himself. I wouldn't dare.
16 I don't know what he meant.

17 Q. Okay. Did you ask him what he
18 meant?

19 A. No, I don't remember this, I don't
20 remember this at all.

21 Q. Then he says: "Not that I was SN
22 to Patrick". Do you understand SN to be Satoshi
23 Nakamoto?

24 A. I would assume so, but as I said,
25 I don't remember this.

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2 Q. Let's go to tab 11.

3 (Exhibit 16 marked for identification)

4 THE COURT REPORTER: This will be
5 exhibit 16.

6 BY MR. BRENNER:

7 Q. A two page document, ma'am.

8 A. I see that, yes.

9 Q. I am going to start from the bottom
10 and work my way up, okay?

11 A. Okay.

12 Q. You see on the top you get all of
13 this BNFYI, right?

14 A. Yes.

15 Q. You were involved in discussions
16 that your husband was having with Patrick Paige;
17 right?

18 A. No, I was never involved with
19 Patrick Paige.

20 Q. He just wanted you to know about
21 it?

22 A. I don't know.

23 Q. Did you say, "Why are you
24 forwarding me these e-mails have nothing to do
25 with this"?

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2 A. No, I get a lot of forwarded
3 e-mails.

4 Q. Patrick Paige writes on the very
5 bottom of the page, this is November 2015. Do you
6 see that?

7 A. I do, yes.

8 Q. "Hi Craig how goes it? Just wanted
9 to touch base with you. I got a call from a
10 reporter who left a message asking about Dave and
11 you. I don't plan to call him back but Carter and
12 I were curious if something is going on." Do you
13 see that?

14 A. Yes.

15 Q. Craig Wrights back -- Dr. Wright
16 writes back. Again, I think we have this
17 Australian problem because it actually goes back
18 in a day, but I think it is clear he is
19 responding. He says: "Thanks for the heads up,
20 reporters are always trouble"; do you see that?

21 A. Hmm hmm.

22 Q. He says: "They ignored the stuff
23 Dave and I did when he was alive." Do you have
24 any idea what your husband is referring to about
25 the stuff that he and Dave did?

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2 A. No, I have no idea. I mean,
3 I could only assume it is about the books that
4 they wrote together. Perhaps if they did some
5 work with the Department of Defence, I am not sure
6 if that was done, I don't know.

7 Q. Let us see if the rest of the
8 e-mail gives you a better idea of what is going
9 on. Then it says: "I do not know what has
10 started to interest them now". Do you see that?

11 A. Yes.

12 Q. He says: "The computer we are
13 running made the top 20 within the top 500 super
14 computer list, so this may be new." Do you see
15 that?

16 A. Umm hmm.

17 Q. You understand that super computers
18 were used at that time period to mine Bitcoin;
19 correct.

20 A. But that is not all they were used,
21 because we had a super computer too with
22 Cloudcroft and it wasn't mining Bitcoin at all.
23 The super computer for Cloudcroft was actually
24 used for research, and our developers used a lot
25 of the information that came out of the super

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2 computer. So no, I don't believe that at all.

3 I think you can use a super computer for mining
4 Bitcoin, you can use a home computer for mining
5 Bitcoin. I use my home computer all the time,
6 I have never mined Bitcoin.

7 Q. Your husband, when he responds to
8 Patrick, he brings up super computers; correct?

9 A. Yes.

10 Q. Okay, what does Patrick write back,
11 the next e-mail up. He says: "No problem" -- he
12 is now talking about -- well, we will read it --
13 he says: "No problem I don't think it's about
14 computers. He mentioned Bitcoin in his message."
15 He is talking about the message that he got from
16 the reporter; correct?

17 A. I assume. I don't know.

18 Q. "Maybe they know something about
19 yours and Dave's Bitcoin involvement." Does that
20 now appear to you that this exchange between
21 Patrick and your husband is about Dave and Craig
22 and Bitcoin?

23 A. I would hate to speculate because
24 I wasn't on the e-mail, I wasn't a party to this
25 e-mail. So I don't know.

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2 Q. It says: "Do you want me to return
3 his call and feel him out" -- he is talking about
4 the reporter; right?

5 A. I would assume so.

6 Q. Then it says, and this is Patrick
7 writing to Dr. Wright: "Are you guys close to
8 releasing any information on Dave's involvement in
9 Bitcoin?" What he is talking about, Miss Watts?

10 A. I have no idea, Mr. Brenner.

11 Q. Crazy, right?

12 A. Crazy.

13 Q. Its crazy, yes.

14 A. I don't know.

15 Q. Okay, so let's go on. None of this
16 rings a bell? It is still your testimony that
17 Dave had no involvement with your husband
18 regarding Bitcoin; correct?

19 A. Absolutely, yes. I mean, it
20 depends on what you say. I think you have to be
21 very specific. I know that Dave actually did talk
22 to people in the Bitcoin community about Bitcoin,
23 but I don't know what he did.

24 Q. Ma'am, are you denying that -- are
25 you saying that you know, under oath, that your

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2 husband did not mine Bitcoin with Dave Kleiman; is
3 that your testimony?

4 A. No, my testimony is that my husband
5 never told me that he mined Bitcoin with Dave, so
6 I don't know that.

7 Q. You don't know one way or the
8 other?

9 A. I have asked him before and he said
10 he didn't, so I do not know, because I wasn't
11 there. I cannot know something if I wasn't there.

12 Q. So let us go to tab 22.

13 (Exhibit 17 was marked for identification)

14 THE COURT REPORTER: This will be
15 exhibit 17.

16 MR. SAOUL: Miss Watts, if you want
17 a break at any point let us know.

18 THE WITNESS: Thank you, I will. I
19 am fine, thank you.

20 MR. BRENNER: Yes, we will do this
21 document and then we will break. It will be
22 short. If you need a break now you are welcome
23 to.

24 BY MR. BRENNER:

25 Q. Okay, Miss Watts, do you have

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2 exhibit 17 in front of you?

3 A. Yes.

4 Q. If you look at the second page of
5 that exhibit ----

6 A. Yes.

7 Q. -- you will see that the second
8 page of those was part of that same trail we were
9 just going through?

10 A. Yes.

11 Q. I apologise it is all broken up.
12 That is the way it happened.

13 A. Okay.

14 Q. So we are going to pick up the
15 trail then on the bottom of the first page?

16 A. Okay.

17 Q. So this is now your husband writing
18 to -- by the way, you are again cc-ed on this
19 whole trail if you look at the top; do you see
20 that?

21 A. Yes.

22 Q. So your husband writes back to
23 Patrick Paige, this is now a few days later. I
24 think we left off at November 19th or so, now we
25 are November 23rd. He says: "Not yet, we are in

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2 the process of finalising some of the research,
3 I was hoping we could be at the point of the
4 release before the reporter starts sniffing." And
5 he signs it "Craig". Do you see that?

6 A. I do.

7 Q. That was him responding to -- the
8 question at the end of the e-mail before was when
9 Patrick had asked if he should return the call of
10 the reporter and whether "You guys were close to
11 releasing any information on Dave's involvement in
12 Bitcoin", so you know where we are, okay?

13 A. Sure.

14 Q. Patrick writes back, this is two
15 days later, he says: "Okay that sounds good." Do
16 you see that?

17 A. Hmm hmm.

18 Q. He says: "I think we both know" --
19 he is writing to your husband, Dr. Wright -- "Dave
20 was a genius when it came to computers, and I sure
21 would like Dave to get recognition for his part if
22 any in the development of Bitcoins." Do you see
23 that?

24 A. Hmm hmm.

25 Q. "I realise there is lot of things

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2 to consider releasing this information but my
3 question is when." Okay?

4 A. Yes.

5 Q. Craig does not write back to
6 Patrick next does he?

7 A. I don't know.

8 Q. Okay, well you will be able to tell
9 by what it says. He says: "Add Patrick to the
10 list of knows" -- K-N-O-W-S; correct?

11 A. Yes, that is what it says.

12 Q. You guys were concerned about ----

13 MS. McGOVERN: Object to the form
14 of the question, for the record, please. Object
15 to form.

16 BY MR. BRENNER:

17 Q. You guys were concerned about who
18 and who did not know about Dave's involvement in
19 Bitcoin, is that not true?

20 MR. SAOUL: Mr. Brenner, if you
21 could just be a little bit more specific about who
22 you are referring to with the expression "you
23 guys".

24 MR. BRENNER: Sure.

25 BY MR. BRENNER:

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2 Q. Dr. Wright and yourself were both
3 concerned about who knew the truth about Dave's
4 involvement in Bitcoin; correct?

5 A. That is incorrect. We were very
6 concerned about who knew that Craig was Satoshi
7 Nakamoto, because at that time we had a lot of
8 reporters sniffing, knocking on our doors, asking
9 questions. Craig did not want to be outed as the
10 creator of Bitcoin.

11 Q. Was he already in discussions with
12 the Andrew O'Hagan for The Satoshi Affair?

13 A. I don't know. Was this the end of
14 2015?

15 Q. '15?

16 A. I am not sure. I did not meet
17 Andrew until much later on. So I don't know if
18 Craig was.

19 Q. It says from what is below -- he is
20 referring to the e-mails below -- it is clear that
21 Dave had discussed with him. Do you see that?

22 A. Sorry, where are we now?

23 Q. On the e-mail of 25th November
24 2015?

25 A. Yes.

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2 Q. Your understanding of this e-mail
3 is they are talking not about Dave's involvement,
4 they are talking about Craig as Satoshi; correct?

5 A. Absolutely, because at that time we
6 were very, very concerned because there were
7 reporters actually knocking on my door and camping
8 outside the house when I was living in Gordon. So
9 we were very concerned.

10 Q. I am going to hold you to
11 absolutely, so let's keep reading.

12 A. Sure.

13 Q. The next line says: "At least for
14 now" -- well, it says -- "From what is below it is
15 clear that Dave had discussed with him" -- you
16 think that is Dave discussing that Craig was
17 Satoshi Nakamoto?

18 A. I don't know. I didn't write that,
19 so I don't know what his meaning was.

20 Q. Then it says: "At least for now he
21 also seems to be willing to not talk" -- that is
22 Patrick not talking; correct?

23 A. I assume so, but I didn't write
24 that, I don't know.

25 Q. Then it says: "But as Dave's

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2 friends he will want to ensure that Dave is outed
3 one day." That is not talking about Craig being
4 outed as Satoshi Nakamoto is it?

5 A. I didn't write that.

6 Q. Ma'am, I did not ask you if you
7 wrote it?

8 A. But you are asking me to comment on
9 an e-mail that I did not write. You are asking me
10 to speculate on what he meant, and I cannot do
11 that because I didn't write it.

12 Q. Okay. Are you telling me that when
13 this e-mail, that talks about Dave being outed one
14 day, you think, as you just told me "absolutely",
15 that this e-mail trail is about Craig or
16 Dr. Wright being outed as Satoshi Nakamoto. That
17 is still absolutely your testimony, correct?

18 A. That is my testimony because
19 I lived it, because I had reporters camping at my
20 door and because we were in discussions of how
21 Craig said, "I do not want to come out as Satoshi
22 Nakamoto".

23 Q. So let's go to the top e-mail, see
24 if this clarifies for you. This is from Stefan
25 Matthews to Dr. Wright; correct?

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2 A. That is what it looks like, yes.

3 Q. Copying you, correct?

4 A. Correct.

5 Q. You guys -- it is an e-mail about
6 everyone needs to get their story straight;
7 correct?

8 A. I don't know what he meant exactly.
9 He does not say, "Let's get our stories straight".

10 Q. Okay, well, let's see what it does
11 say. It says: "Let's talk on Monday about
12 exactly what Dave's involvement was." Do you
13 agree that Stefan Matthews is telling you that
14 what the concern is, is not about whether Craig is
15 Satoshi Nakamoto and outed as such, the concern
16 about is what are people to going to find out
17 about Dave's involvement. Are you willing to say
18 that that is what that means, or not?

19 A. Well, I am not, because I don't
20 know what he meant.

21 Q. Do you think Dave's involvement may
22 have mean Craig was Satoshi Nakamoto?

23 A. Sorry, what was the question?

24 Q. Do you think the term, when he
25 said, "let's talk about exactly what Dave's

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2 involvement was", do you think that that may have
3 been a reference to Dr. Wright being Satoshi
4 Nakamoto?

5 A. I think that is probably more a
6 question that needs to be asked for the person who
7 wrote it, because I cannot speculate on what was
8 going on in his mind when he wrote that e-mail.

9 Q. Then the story was whether the
10 purpose of this e-mail was to get the story
11 straight, let us look exactly what Stefan Matthews
12 thinks. He says: "Let's talk on Monday about
13 exactly what Dave's" -- excuse me, my dog is
14 barking here -- this is the last question on this.
15 Let's read what he says and let me know if you can
16 read that and you can agree with me, that what
17 Stefan Matthews was concerned about, was that the
18 three of you, you, Dr. Wright and Stefan Matthews
19 get your story straight about Dave's involvement.
20 Let's read it and then you tell me if that is what
21 those words mean to you, and you can tell me it
22 doesn't and that is fine. It says, and I quote:
23 "Let's talk on Monday about exactly what Dave's
24 involvement was to ensure that no conflicting
25 views on this come out." Is that the way you

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2 interpret that sentence, the way I characterised
3 it?

4 A. Well, it is just how you have read
5 it. I can read it the same way as how you read
6 it, so those are the words on the page.

7 Q. What does that mean to you?

8 A. I would not know. I would like to
9 see Stefan in the face, as I said, and say, "What
10 did you mean by that?" I don't like to speculate
11 on what somebody else has written.

12 MR. BRENNER: Okay. Let us take a
13 break.

14 THE EXAMINER: Shall we take a
15 break for five minutes. It is now 6.06 in Britain
16 so everybody is back in five minutes.

17 (A short break off the record from 6.06 to 6.12)

18 THE EXAMINER: It is now 12 minutes
19 past 6 in Britain so we can go back on the record.

20 MR. SAOUL: Ms. Green, Mr. Brenner,
21 just one housekeeping point to make you aware of.
22 The court reporter has informed me that she has to
23 leave promptly at 7. Just so you are aware.

24 MR. BRENNER: Okay, thank you.

25 BY MR. BRENNER:

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2 Q. If we could -- Miss Watts if we
3 could go to -- let me ask you first of all, were
4 you involved in the decision to participate with
5 Mr. O'Hagan in the writing of The Satoshi Affair?

6 A. It was not really a decision that I
7 made. It was sort of pushed upon us.

8 Q. Okay. You did meet with
9 Mr. O'Hagan through his work on that article,
10 right?

11 A. I did.

12 Q. And you were forthright with him?

13 A. I spoke to him about many things,
14 yes.

15 Q. Do you recall that one of the --
16 you have read The Satoshi Affair, have you not?

17 A. No, I did not.

18 Q. Really?

19 A. Absolutely not.

20 Q. Okay. Do you understand that part
21 of that article has to do specifically with your
22 husband's relationship with Dave Kleiman?

23 A. I didn't read the book. I knew it
24 was about Bitcoin. I -- really it was more about
25 what nChain, it was supposed to be. This is what

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2 we were told. It was supposed to be what nChain
3 was doing and the work that they were continuing.
4 It was not so much -- apparently there was a lot
5 of information about what happened in the past
6 that I don't think was factual, but I didn't read
7 it, I was told that it was very much like a
8 tabloid.

9 Q. You had communications directly
10 with Mr. O'Hagan in his preparation for the
11 article, did you not?

12 A. I did.

13 MR. SAOUL: Mr. Brenner, just as a
14 marker, strictly speaking conversations with
15 Mr. O'Hagan and The Satoshi Affair article are not
16 within the scope of the deposition that you
17 sought. I am prepared to allow. Questions to the
18 extent they go to the items that are identified,
19 such as the ownership of the Bitcoin intellectual
20 property at issue ----

21 MR. BRENNER: It is going to be
22 about that.

23 BY MR. BRENNER:

24 Q. If you look at -- did we pull up
25 the exhibit, tab 12?

1

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2

(Exhibit 18 was marked for identification)

3

Q. It is a one page document?

4

A. Yes.

5

Q. Briefly take a look at this to

6

orientate yourself with what it is about?

7

A. Yes.

8

Q. You could see that, that

9

Mr. O'Hagan was communicating with your husband

10

regarding information that would link Dr. Wright

11

to the invention of Bitcoin. Do you see that?

12

A. Yes.

13

Q. And if you go to the top of the

14

page there is an e-mail dated March 30th 2016 at

15

5.34?

16

A. Yes.

17

Q. That is an e-mail from Mr. O'Hagan

18

which was ultimately forwarded to you, I guess it

19

is the next day. Do you see that?

20

A. I do.

21

Q. Now, what Mr. O'Hagan writes, we

22

know he is writing at a minimum to your husband.

23

It is unclear from this whether it is to you also.

24

He writes, "Thanks Craig", do you see that?

25

A. Yes.

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2 Q. "Please keep them coming", do you
3 see that?

4 A. I do.

5 Q. He says: "All papers and e-mail
6 and annotations." The annotations he is referring
7 to is that he would sent drafts of certain things
8 and he would give your husband an opportunity to
9 annotate; correct?

10 A. I don't know.

11 Q. Okay. "All papers and e-mails and
12 annotations that could help me build a profile of
13 what you have done." Do you see that?

14 A. Yes.

15 Q. Then he says: "The Dave stuff is
16 practically non-existent on paper." Do you see
17 that?

18 A. Hmm hmm.

19 Q. He says: "I understand you wiped a
20 lot." Do you know what that refers to?

21 A. Yes, I know that Craig wiped a lot
22 of his accounts when the reporters started coming
23 to our house.

24 Q. Okay, so when you say the
25 reporters, were these the reporters associated

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2 with Mr. O'Hagan or some other reporters?

3 A. No, they were -- I do not know
4 where they were from. I think from Wired and
5 Gizmodo and other places. They were camping
6 outside our house asking all sorts of questions.

7 Q. And in order to protect information
8 your husband wiped certain computers?

9 A. I don't know exactly what he did,
10 I know he wiped his social media, because he had
11 been posting a lot of things about Bitcoin, even
12 from 2007, I think. He had been writing a lot
13 about Bitcoin and he didn't want to be known as
14 Satoshi.

15 Q. Then Andrew O'Hagan writes "I
16 understand you wiped a lot but a final trawl
17 through your digital universe might give me
18 something that connects the two of you" -- he is
19 talking about Craig and Dave; correct?

20 A. I don't know.

21 Q. You don't know?

22 A. Well, I didn't write it so I don't
23 know. You can assume that, but I don't know that
24 for sure. You are asking me if it is right,
25 I don't know because I didn't write it. I think

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2 you can assume it from here, but I don't know for
3 sure.

4 Q. He says, "Something that connects
5 the two of you unarguably to the invention",
6 right?

7 A. That is what he says.

8 Q. He mentions the invention of
9 Bitcoin; correct?

10 A. I don't know.

11 Q. Was Andrew O'Hagan writing
12 something about some other invention with your
13 husband?

14 A. No, he was writing about -- well,
15 as I said, he was supposed to be writing about
16 what nChain was doing, so really I'm not quite
17 sure what he ended up writing about, because
18 I didn't read it, I was just told.

19 Q. What were you told the article
20 said, if you did not read it?

21 A. I was told that it was ----

22 MS. McGOVERN: Objection to form.

23 BY MR. BRENNER:

24 Q. You can answer.

25 A. -- I was told that it was very much

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2 like a dramatic tabloid.

3 Q. Did your husband ever tell you that
4 anything in the article was untrue?

5 A. Yes.

6 Q. What did he tell you was untrue?

7 A. A lot of it. He didn't go into
8 specifics.

9 Q. He didn't tell you any specifics
10 that were untrue?

11 A. No, because I hadn't read it, so he
12 just said that half of that book was not true.

13 Q. When you say book, are you
14 referring to the long form article, The Satoshi
15 Affair?

16 A. Yes.

17 Q. Let me ask you this. As your -- in
18 your role as trustee or co-trustee for the Tulip
19 Trust have you ever done anything?

20 A. Can you be more specific?

21 Q. Sure. Have you ever for example
22 have you ever expended assets from the trust?

23 A. For Tulip Trading, yes.

24 Q. What do you mean, you have directed
25 that Tulip Trading expend assets?

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2 A. Yes.

3 Q. You have not directed anything
4 relating to Wright International Investments, is
5 that what you are telling me?

6 A. Yes, nothing for Wright
7 International, but for Tulip Trading, yes.

8 Q. Is it your testimony, as you are
9 here today, that you do not know how much Bitcoin
10 is in Wright International Investments?

11 A. I don't know the exact amount, no
12 I don't.

13 Q. Since it is being held for the
14 benefit you and your family, can you give me any
15 estimate whatsoever of the amount?

16 A. I don't. It is in the hundreds of
17 thousands I believe. I don't know.

18 Q. Hundreds of thousands of Bitcoin?

19 A. I believe so.

20 Q. So let's go more to this Andrew
21 O'Hagan topic. If you could go to tab -- I think
22 it is 3, although I think there is transcription
23 error on my index. Look at number 3 if you would
24 please. Counsel, you have your own copy?

25 MR. SAOUL: Yes.

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2 MR. BRENNER: Is 3 like a third of
3 a page?

4 MR. SAOUL: Yes.

5 MR. BRENNER: An e-mail from Miss
6 Watts?

7 MR. SAOUL: Yes.

8 BY MR. BRENNER:

9 Q. So Miss Watts, we are looking at
10 what was marked as exhibit 13. Miss Watts, unlike
11 some of the other e-mails we looked at previously,
12 this is actually an e-mail that you wrote, right?

13 A. I don't know. It comes from my
14 e-mail address but it was five years ago, I don't
15 remember if I wrote this e-mail five years ago.

16 Q. Well, let's see what it says, and
17 see if that refreshes your recollection of whether
18 you wrote it. You write: "Hi Andrew" -- you are
19 talking to Andrew O'Hagan; correct?

20 A. Am I looking at the wrong one ----

21 MR. SAOUL: Mr. Brenner, the one we
22 have at tab 3 is a document numbered 22384, e-mail
23 from Miss Watts to Mr. Matthews 27th June 2015 at
24 12.58.

25 MR. BRENNER: I am sorry, my bad.

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2 Look at tab 10.

3 MR. SAOUL: 23348, March 31st 2016,
4 at 8.55.

5 MR. BRENNER: Yes, thank you.

6 (Exhibit 19 was marked for identification)

7 BY MR. BRENNER:

8 Q. Miss Watts, I apologise for that
9 little mix up.

10 A. That's okay.

11 Q. This is an e-mail that you wrote,
12 or at least if you accept it for what it purports
13 to be, that you wrote on March 31, 2016?

14 A. That is correct.

15 Q. It is an e-mail from you to
16 Mr. O'Hagan, right?

17 A. It would seem to, yes.

18 Q. You copy in your husband; correct?

19 A. Yes.

20 Q. I didn't ask you this before. What
21 is the RCJBR e-mail address?

22 A. It is just a domain, like a g-mail,
23 just a hotmail or something, it is just a domain.

24 Q. What does it stand for?

25 A. Our family's name.

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2 Q. Okay, great. I see it now. If you
3 wrote this you wrote: "Hi Andrew", do you see
4 that?

5 A. Yes.

6 Q. "There are some correspondence of
7 bit messages between Dave and Craig, we compiled
8 last year for the ATO, who wanted evidence of
9 transactions and intent." Do you see that?

10 A. Yes.

11 Q. Do you recall providing the ATO
12 with evidence of communications between Dave and
13 Craig regarding issues that were in issue before
14 the ATO?

15 A. I recall providing the ATO almost
16 every bit message that we had that we could find
17 between Dave and Craig, yes.

18 Q. It says: "Of course now they
19 contend that has all been forged" -- that is the
20 ATO is contending documents have been forged;
21 correct?

22 A. Yes.

23 Q. Including documents between Dave
24 and Craig; correct?

25 A. I don't remember if that is exactly

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2 what they contended, but if I wrote this -- I am
3 not sure if I did, but if I did, then that is what
4 would be what this meant.

5 Q. Do you have any reason to doubt
6 that you wrote this e-mail?

7 A. Look, I have no reason to doubt it,
8 but I don't recall writing it.

9 Q. Okay. You write what you are
10 sending -- there is an attachment that is called
11 "Dave sic and set up of DBH.PDF, right?

12 A. Yes.

13 Q. Do you know what that was?

14 A. I really don't remember.

15 Q. You write to Mr. O'Hagan: "I am a
16 bit nervous sending this to you, not because I
17 don't trust you, you must know I trust you
18 implicitly, but in case either of our e-mails are
19 compromised." So what you were sending to
20 Mr. O'Hagan you wanted to make sure no one else
21 got their hands on it, right?

22 A. Hmm hmm.

23 Q. "Last year there were several hard
24 core attempts to compromise our e-mails." That is
25 something you have told me about already; correct?

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2 A. That's correct.

3 Q. It says: "Craig is still searching
4 all archives for more pertinent correspondence
5 with Dave but has not found them yet. He will
6 continue to try." Right?

7 A. Yes.

8 Q. You understood, based on the part
9 of the document we looked at in this one, that
10 what Mr. O'Hagan was interested in, and one of the
11 things he was talking to your husband about, was
12 specifically Dave's involvement with your husband
13 in the development of Bitcoin; you understood
14 that, right?

15 MS. McGOVERN: Object to the form.

16 BY MR. BRENNER:

17 Q. Did you have any understanding when
18 you were sending stuff to Mr. O'Hagan what was his
19 interesting in Dave Kleiman?

20 A. Well, I had not finished when
21 I said no. That is not my understanding. I did
22 not have an understanding of Dave's involvement in
23 the development of Bitcoin, because I know that
24 Dave did not develop Bitcoin. My husband did. It
25 was more Dave's involvement in the fact that Craig

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2 found it very difficult to, as you know, express
3 himself, and he had a lot of problems with, I
4 guess it was called at that time, and even now,
5 the Bitcoin community. So Dave was his
6 interpreter. And so Craig would be saying to him,
7 you know, "This is what I actually mean" and Dave
8 would be saying that out into the community. That
9 is not the development of Bitcoin.

10 Q. My question for you is a little
11 more direct. Do you have any understanding of
12 what topic Mr. O'Hagan was interested in when you
13 were trying to collect for him communications
14 between your husband and Dave?

15 A. It was just any communications
16 between Craig and Dave, what they were doing
17 together; that is all I was giving him. But your
18 initial question to me was did I have an
19 understanding that Andrew O'Hagan was asking about
20 Dave's involvement in Bitcoin or the creation of
21 Bitcoin, I think you might have said, and I said
22 no, that was not my understanding at all, because
23 that's not what happened.

24 Q. I know -- I understand your
25 testimony is it was definitely not about Dave's

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2 involvement in Bitcoin, so what was it about?

3 What was were the messages that you were trying to
4 get from Mr. O'Hagan?

5 A. No, no. I just said it was not

6 Dave's involvement in the creation of Bitcoin.

7 Dave's involvement in Bitcoin was such that, it's

8 like my involvement in Bitcoin. I'm married to

9 the man who created Bitcoin and there to support

10 him. Dave's involvement then, it would -- I think

11 your question would have to be very specific.

12 Dave's involvement would be the fact that he was

13 Craig's best friend. Craig ranted and raved and

14 Craig said, "People don't understand me. Can you

15 please explain this. This is what I mean.

16 I wrote the White paper. This is what I mean.

17 People are misinterpreting it and they are still

18 misinterpreting it." But Dave understood him.

19 Dave didn't judge him. Dave didn't try and twist

20 it around. People use what Craig wrote. He spent

21 his lifetime doing it and they've twisted it so

22 that they -- they said that "Satoshi said that

23 Bitcoin is supposed to be anonymous. That we're

24 supposed to be able to buy whatever we want,

25 because we have freedom. We can buy drugs if we

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2 want to and governments cannot stop us." That is
3 what people were saying. And Craig said that is
4 not what I mean all but he couldn't express
5 himself properly as you see in some of these
6 e-mails if he has written them. You need to look
7 him in the face and you need to say "What exactly
8 do you mean". Now, Dave spent hours and hours
9 talking to Craig about it. Dave said, "What do
10 you mean?" He then managed to express that into
11 the community and told some people and some people
12 believed him and others did not. That would be
13 his involvement. But when you first asked me you
14 said, "is Dave's involvement in the creation of
15 Bitcoin." That would not be in an involvement in
16 the creation, but that would be an involvement in
17 supporting my husband in the same way I support my
18 husband. But I have nothing to do with Bitcoin.
19 I support him. I worked for some of the companies
20 before, I was a director, I hired people;
21 I certainly didn't create it.

22 Q. So is your understanding that when
23 Mr. O'Hagan was looking for information about how
24 Dave leant emotional support and back up to your
25 husband but not having to do them being in

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2 business together?

3 MS. McGOVERN: Object to the form
4 and question.

5 BY MR. BRENNER:

6 Q. Is that correct?

7 A. My understanding is that Andrew
8 O'Hagan wanted to know everything about Dave
9 because Craig talked about Dave a lot. Dave was
10 his best friend, probably his only friend.

11 Q. Okay, so if you could go to 6, tab
12 6?

13 THE COURT REPORTER: This will be
14 exhibit 20.

15 (Exhibit 20 was marked for identification)

16 BY MR. BRENNER:

17 Q. Okay. Two page document do you see
18 that?

19 A. I do.

20 Q. Okay. If you look at the very last
21 e-mail on the second page?

22 A. Yes.

23 Q. That is an e-mail from your husband
24 to you, among other people, correct?

25 A. Yes.

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2 Q. Writing about a gentleman from a
3 Wired magazine that is on his trail?

4 A. Yes.

5 Q. He quotes what the Wired person
6 said to him. He says: "We have some strong clues
7 as to pseudonymous work ...(reads to the words)...
8 accounting." Do you see that?

9 A. I do.

10 Q. Now, off the quote, your husband
11 writes to you and others: "I have removed
12 anything so that they will have trouble with
13 proof. I have even updated the internet archive
14 to delete this and there is no old forensic
15 history." Do you see that?

16 A. I do.

17 Q. That's something that your husband
18 does, doesn't he? He has the ability to make
19 changes and change forensic history of documents,
20 isn't that true?

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

23 BY MR. BRENNER:

24 Q. Is that true, Ma'am?

25 A. It's the same way that I have the

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2 ability to go into a shop and take something
3 without paying for it but I would never do that.
4 So, I'm not quite sure what question you are
5 actually asking me.

6 MR. SAOUL: Yes, can we have a
7 question that ----

8 BY MR. BRENNER:

9 Q. Here he says he -- whatever it
10 means he is not saying can do it, it says he did
11 do it. So let's read it together. It's not a
12 hypothetical, Ma'am. He says: "I have removed
13 anything so they will have trouble ...(reads to
14 the words)... forensic history." Ma'am, you and
15 I can read the same thing, your husband is the not
16 saying what he can do, you husband is telling you
17 what he did do to alter the forensic records of
18 documents regarding -- what Andrew Greenberg was
19 looking at, isn't that true?

20 A. That is not what I see at all.

21 Q. What do you see?

22 A. As I explained to you before, we
23 had reporters on our trail. Craig never wanted to
24 come out as Satoshi at all, and the reason being
25 we wanted our privacy and he knew that if he ever

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2 came out as the creator of Bitcoin this would be
3 our life, which is not pleasant. We had a very
4 nice quiet family, nuclear family life which is
5 very nice. So, as we mentioned before, he did
6 actually before delete his old -- I believe he had
7 Facebook, I think he had some other blogs; he
8 deleted that. What this says here I don't know.
9 I mean, I didn't write this. But if he deleted
10 something that said that he was the creator of
11 Bitcoin, then that's what he did. I know he
12 deleted some Facebook posts, because he had posts
13 written from I think it was 2006 and he was saying
14 this is what we should be doing, and he was
15 mentioning things similar to Bitcoin. He didn't
16 want any proof that he was Satoshi. He wanted his
17 privacy. He's a very, very private person. He is
18 a very quiet person. He doesn't want to be
19 dragged in the media at all. He doesn't want a
20 book written about him. He's incredibly shy.

21 Q. He actually -- we won't go through
22 that. Go to the first page of the exhibit.

23 A. Sure.

24 Q. The first e-mail?

25 A. Hmm hmm.

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2 Q. Talking about the Wired magazine
3 again, correct?

4 A. Yes.

5 Q. From Dr. Wright to you and Stefan
6 and Robert McGregor?

7 A. I can see that.

8 Q. He says: "The people at Wired have
9 saved copies of everything before I deleted and
10 cleaned it, it seems from the e-mail below." So
11 he is reporting to you that despite his efforts
12 someone found stuff before he had a chance to
13 delete them, isn't that correct?

14 A. Are we on the first page, I'm not
15 -- I cant see where you are saying ----

16 Q. First page, first e-mail. Do you
17 see where it says "The people at Wired"?

18 A. Okay, the fourth paragraph you
19 mean? Yes.

20 Q. It looks that way to me, yes. He
21 is saying there that despite his best efforts to
22 delete things, it seems that someone got their
23 hands on it; correct?

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

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2 BY MR. BRENNER:

3 Q. Do you agree or disagree with the
4 characterisation?

5 A. I agree with what is written here,
6 I don't exactly know what it means, but it was
7 written there.

8 Q. You see the next paragraph?

9 A. Hmm hmm.

10 Q. I will read the last sentence it
11 says: "I do not know who the 'source' they're
12 working with is but we may be able to limit the
13 exposure to a time that allows us to have the IP
14 locked down." Do you see that?

15 A. Yes, he also says at the
16 beginning: "He hints of quotes from my work from
17 2006 in modelling risk." So he was talking about
18 the work that he -- and that's what I'm saying to
19 you. Craig was working on the creation of Bitcoin
20 even 20 years ago but he really started to
21 formalise it, I think, in early 2000. In 2006, I
22 can't remember when he wrote his masters, it
23 became very apparent what he was working on was
24 Bitcoin. So here he says: "He hints at quotes of
25 my work from 2006." Craig wanted to delete as

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2 much as he could of some of the work he had done,
3 because he didn't want to be outed as Satoshi.

4 Q. Well, let's look at what he's
5 trying to hide. If you go down to the next, the
6 bottom of the italicised paragraph. This is he is
7 quoting an e-mail from Andy from Wired magazine to
8 him; correct?

9 A. I don't know. It says "Andy" at
10 the bottom, so I don't know if it's a quote or he
11 has copied it somewhere. I don't know.

12 Q. It has quotation marks around the
13 whole thing, right?

14 A. Oh, yes, I see the quotation marks.

15 Q. The reporter is writing to
16 him: "Unlike that story" -- I'm about five
17 paragraphs down, you see that, "Unlike that
18 story"?

19 A. Yes.

20 Q. "Unlike that story, I want to work
21 with you on this piece to get it right. Beyond
22 giving you the full credit you are due for your
23 work in developing Bitcoin, I want to talk deeply
24 about its innovation starting from its origins to
25 incorporating a risk modelling cost benefit

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2 approach and Craig's triple entry accounting idea
3 ... (reads to the words)... the first coins." Is
4 that what Craig was trying to cover up?

5 A. I -- definitely not. I think he
6 actually did ask Dave to help him edit the White
7 paper. Whether or not Dave did, I do not know.

8 Q. So does that refresh your
9 recollection that one of the things he edited for
10 Craig may have been the White paper for Bitcoin?

11 A. I said I think he did ask Dave to
12 edit the White paper but whether or not he did it
13 I don't know.

14 Q. Okay. Give me one second. I know
15 we've got 20 minutes left.

16 A. So, "editing" means -- I mean
17 I edit a lot of Craig's papers just to let you
18 know. So, when he writes any of his PhD thesis or
19 any of the work that he does, I edit his papers.
20 I'm not technical at all. He has a lot of
21 grammatical mistakes because he writes very
22 quickly and he also uses something called Dragon,
23 which he actually speaks into and half the time
24 the things come out are not grammatically correct,
25 so I edit a lot of Craig's papers.

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2 Q. Okay. What I'm going to do now is
3 I'm going to share, I'm going to put on the screen
4 a document which is what we were doing with you're
5 -- at your husband's deposition. Let me just make
6 sure I have name of it right. Okay. Madam Court
7 Reporter, I will supply you with this after the
8 deposition.

9 THE COURT REPORTER: Thank you.

10 THE EXAMINER: Shall we call it
11 exhibit 21 and identify it.

12 MR. BRENNER: That will great.
13 That will exhibit 21. It is a 23 page document.
14 Can everyone see the document?

15 (Exhibit 21 was marked for identification)

16 A. Yes. Can you scroll down so I can
17 see the whole thing please.

18 BY MR. BRENNER:

19 Q. I'm going to. I'm just trying to
20 get oriented. Okay? I'm going to start from the
21 top, so you can see it, okay? The top is an
22 e-mail from -- purports to be an e-mail from
23 Dave Kleiman to your husband in June 2011. Okay?

24 A. Okay.

25 Q. I'm going to -- I believe this has

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2 been identified as the 2011 trust. We're starting
3 on page 2, do you see that? Is that what you
4 understood the 2011 trust that you were the
5 trustee of?

6 A. Absolutely not, because I wrote
7 the 2011 trust with Craig, so no. Definitely not.

8 Q. So this document which is -- starts
9 date stamp DEF_00002414 is absolutely not the
10 first Tulip Trust document, correct?

11 A. Not the one that I created with
12 Craig, absolutely not.

13 Q. Okay. In this document it says
14 that: "Dave Kleiman shall become the transfer" --
15 excuse me, that: "Dave Kleiman shall be come the
16 trustee for the transfer of the Satoshi I received
17 from Craig Wright." Can you see that?

18 A. I can see that.

19 Q. As far as you know, Dave was never
20 the trustee for any of the Tulip Trust; correct?

21 A. Yes, that's correct.

22 Q. Dave says he received a 1,111,000
23 Bitcoin from Craig Wright and it says: "Former
24 trustee managed by at least 3 people but not more
25 than 7 at any time." Do you see that?

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2 A. I see what's written, yes.

3 Q. That is absolutely not the Tulip
4 Trust; correct?

5 A. It's not the Tulip Trust that I
6 know. Perhaps if there was another one that I
7 don't know about. It's not the one that I created
8 with Craig in 2011.

9 Q. Okay. I will scroll down through,
10 this is just so you know this is -- there's more
11 than one document in this composite exhibit; okay?

12 A. Sure.

13 Q. I will identify for the report, so
14 now, there's a document dated 23rd October 2012;
15 do you see that?

16 A. Yes.

17 Q. That starts at Bates stamp
18 DEF_00050985. It says: "Together the parties
19 shall be jointly known as the Tulip Trust." Do
20 you see that?

21 A. I do.

22 Q. "The trust is between Wright
23 International Investments and Tulip Trading." Do
24 you see that?

25 A. I do.

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2 Q. Is this the Tulip Trust that you
3 helped Craig right?

4 A. Can you scroll down so that I can
5 read it all.

6 Q. Absolutely. Were you done with the
7 first page?

8 A. No.

9 Q. Okay, you tell me?

10 A. Can you scroll down, I'm done with
11 the first page, yes.

12 Q. Okay, thank you, Ma'am?

13 A. Can you keep scrolling down.

14 Q. Of course.

15 A. Okay, keep scrolling down. All
16 right, okay.

17 Q. Okay, is this the Tulip Trust that
18 you are a trustee for?

19 A. I don't recall. Some of the words
20 would be similar, but not all of them, no.

21 Q. There's yet another -- there is
22 another Tulip Trust document -- 2011, so far we
23 have not looked at the 2011 trust document you
24 referred to, 2012 trust document you referred to,
25 we have not looked at the 2014 one you referred

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2 to. The two documents I've shown you so far are
3 none of those things?

4 A. I don't know if this one is.
5 I really don't know. I don't remember.

6 Q. Let's see who the trustees are,
7 maybe that will help you. Trustees, Ms. Uyen.
8 That's not you, is it?

9 A. No.

10 Q. Craig Stephen Wright, that's not
11 you, is it?

12 A. No. So it wouldn't be the -- it
13 wouldn't be the Tulip Trust as I know it, no.

14 Q. Okay. So, neither of these two
15 things we've looked at are the Tulip Trust.

16 A. No.

17 Q. Okay, let's go on. Now we're
18 starting a new document, this one -- I just want
19 to get you the date but I'll scroll back up. This
20 one, the date's on the first page. So, do you
21 recognise this document?

22 A. No.

23 Q. No? Okay. I'll scroll through it
24 just so you make sure you don't. There is one of
25 the trustees is Denis Mayaka; correct?

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2 A. Yes.

3 Q. You're actually listed as the
4 appointor. Is the Tulip Trust document that
5 you're are a trustee for?

6 A. No, I don't think so. I don't
7 actually recall because it was from 2011. I
8 really don't recall which one it was.

9 Q. Okay, this one is from 2012?

10 A. Yes, I don't recall. I really
11 don't.

12 Q. This starts at the DEF_00050990?

13 A. Sure.

14 Q. Just trying to get to the end of
15 it.

16 A. Many words in a trust are very
17 similar and that's why I say there are
18 similarities, but if this is the exact one,
19 I don't remember. I really don't. The other
20 issue is that we had many drafts. So if you are
21 asking me if this is the exact one, I really don't
22 know. It could be one of the drafts, that ----

23 Q. I'm going to represent to you that
24 these two trusts that we looked at were ones that
25 -- or three documents that your husband swore were

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2 the Tulip Trusts?

3 A. Well ----

4 Q. They may be drafts?

5 A. They might be, yes, I don't know.

6 MR. SAOUL: Having made that
7 representation, Mr. Brenner, was there a question
8 you wanted to ask the witness?

9 MR. BRENNER: No. I thought I did
10 ask a question. She answered it. Okay.

11 BY MR. BRENNER:

12 Q. Let me just review my notes and
13 make sure we're done, okay?

14 A. Sure.

15 MR. FREEDMAN: Maybe go off the
16 record for two minutes.

17 THE COURT REPORTER: We're going
18 off the record at 6.49 p.m.

19 (A short break off the record from 6.49 p.m. to
20 6.54 p.m.)

21 THE EXAMINER: It's now 6.54.

22 MR. SAOUL: Ms. McGovern has a
23 couple of short questions. I'm just making that
24 clear.

25 MR. BRENNER: Okay. We're back on?

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2 THE EXAMINER: Yes.

3 BY MR. BRENNER:

4 Q. Miss Watts, during the break
5 I asked your counsel and asked you to go to tab
6 15?

7 A. Okay, yes.

8 THE EXAMINER: Exhibit 22.

9 (Exhibit 22 was marked for identification)

10 BY MR. BRENNER:

11 Q. Are you there?

12 A. Yes.

13 Q. I think it is a one page document.
14 This is an e-mail. Do you have any reason to
15 dispute that this is an e-mail you sent in
16 September 2015 to Stefan Matthews?

17 A. I don't recall it, but I have no
18 reason to dispute that I sent him an e-mail.

19 Q. You wrote "WFT was established in
20 August 2013". Is WFT the Wright Family Trust?

21 A. Yes, it would be.

22 Q. Was that the Australian arm of the
23 Tulip Trust?

24 A. Yes. It's like an Australian
25 representative of it. It's like a branch.

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2 Q. Okay. You say that at that point
3 Craig had purchased software personally as well as
4 had agreements around Bitcoin rights for overseas
5 trust, WII and Tulip Trading?

6 A. That is correct.

7 Q. The Bitcoin we talked already, the
8 mined and the purchased Bitcoin?

9 A. That is correct.

10 Q. You say: "The information
11 regarding the other two trusts has not been
12 disclosed at the ATO." What were the other two
13 trusts?

14 A. I believe it's these two that I
15 wrote about but I actually don't remember. As
16 I said five years ago, I don't remember.

17 Q. You write "CW" which I assume is
18 Craig Wright?

19 A. No, no, Craig Wright R&D which
20 would be ----

21 Q. Oh, I'm sorry you're right, you're
22 right. "CW R&D sold to WFT", so this is Craig
23 Wright R&D sold to Wright Family Trust, right?

24 A. Yes.

25 Q. Software, right?

1

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2

A. Yes.

3

Q. Bitcoin, rights?

4

A. Yes.

5

Q. And then it says W&K software?

6

A. Right.

7

Q. So by 2015 Craig Wright R&D had

8

sold W&K software to Wright Family Trust?

9

A. I don't remember. I don't remember

10

writing this e-mail. So, I don't remember.

11

Q. You do recall that as a result of

12

the result of the Australian court proceedings

13

that Craig Wright R&D obtained a judgment for

14

certain intellectual property and software from

15

W&K?

16

A. Was that the judgment that we

17

talked about when he had the default judgment?

18

Q. Yes.

19

A. Well, as I said, when you asked me

20

that question, I didn't know what it was. I knew

21

that he had a court proceeding and I knew he had a

22

default judgment but I didn't know what it was.

23

Q. You understood that he got

24

something out of that, right?

25

A. Yes.

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2 Q. You understand that he later sold
3 it to WFT?

4 A. I believe he would have told me
5 that at that time and that's why, if I did write
6 this, I would have written that but it was from
7 information that he told me, yes.

8 Q. Okay. In the interest of time,
9 I know the court reporter needs to leave. I know
10 that I made a commitment that I would do my best
11 to finish, although we've gone about an hour less
12 than we're allowed to go pursuant to our rules, at
13 least. That has to be disputed it will be one
14 that you guys don't need to worry about and we'll
15 hash it among the lawyers here. With that caveat,
16 I'm done right now and I understand you said that
17 Ms. McGovern had some questions. Before you go,
18 thank you Miss Watts, thank you for your time
19 today and thank you for ----

20 MS. MCGOVERN: I do although, it's
21 my understanding that the time that agreed upon
22 amongst you and UK counsel was by agreement, and
23 I'm not quite sure what you mean about we are
24 going to take it up here in the United States with
25 respect to the deposition. It is my understanding

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2 there was an agreement upon timeframe, much like
3 Mr. O'Hagan yesterday, whereby we would end by 7.
4 I am not sure what you mean by that, Mr. Brenner,
5 if you could plain.

6 MR. BRENNER: You really want to
7 spend the time explaining? How about we get the
8 witness out and then I'll explain.

9 MS. McGOVERN: Well, we don't agree
10 with you.

11 MR. BRENNER: You rarely do and
12 that's our respective jobs! But let's let the
13 court reporter and the witness get out. So why
14 don't you ask your questions.

15 MS. McGOVERN: Courteous, as
16 always!

17 BY MS. McGOVERN:

18 Q. Ms. Watts I have a few questions
19 for you. It will be very brief.

20 A. Sure.

21 Q. I'm going to the section in the UK
22 order, which controls this deposition, section (b)
23 and I'm going to ask you a specific question
24 (unclear) and the scope of the UK order.

25 MR. BRENNER: Ms. McGovern, you're

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2 fading out a little bit.

3 MR. SAOUL: So, I've got a copy of
4 the UK order here.

5 BY MS. MCGOVERN:

6 Q. My question is directed to
7 subsection (b) of the consent order governing this
8 proceeding. Can you hear me?

9 A. Yes.

10 Q. Miss Watts, did Dave Kleiman to
11 your knowledge ever intervene with the ATO
12 investigation to address his role in any, in any
13 of the corporations that were the subject of the
14 ATO proceeding ----

15 A. No.

16 Q. -- regarding Bitcoin?

17 A. No, I'm sorry, I did not mean to
18 interrupt you, but no, he never did.

19 Q. Did Dr. Wright ever tell you that
20 Dave Kleiman was also addressing in the ATO
21 proceedings questions regarding his role, if any,
22 with respect to any of the corporations that were
23 a part of the ATO investigation regarding Bitcoin?

24 A. No, he never told me that.

25 Q. Miss Watts I believe you testified

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2 earlier today that you negotiated or tried to
3 negotiate with Ira Kleiman the personal
4 representative of Dave Kleiman's estate following,
5 of course, Dave Kleiman's unfortunate death and my
6 question is this. You testified I believe that
7 Ira Kleiman had or stated that one of the reasons
8 that he did not accept either shares or money that
9 was offered for Coin-Exch was that --

10 MR. RIVERO: I'm sorry Ms/
11 McGovern, I'm losing you. I don't know if it's
12 maybe just me or maybe it's someone else but is
13 anyone else having difficulty? You keep cutting
14 in and out for me.

15 MR. BRENNER: We are getting her
16 good, let's just let her finish.

17 THE EXAMINER: We're hearing it.

18 MR. RIVERO: All right. It must be
19 me. Sorry, Amanda.

20 BY MS. MCGREGOR:

21 Q. That's okay. Let me restate the
22 question. Miss Watts, you testified that one of
23 the reasons, correct me if I am wrong, please,
24 that one of the reasons Ira Kleiman refused to
25 accept money or shares in Coin-Exch on behalf of

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2 Dave Kleiman's estate was because Ira Kleiman did
3 not want to pay tax; do you recall that?

4 A. Well, that's what he said to us,
5 yes.

6 MR. BRENNER: Object to form.

7 BY MS. MCGREGOR:

8 Q. And you also testified that
9 Dr. Wright became cross, I believe you used the
10 word "cross" C-R-O-S-S, which I understand to be
11 an English phrase for angry in connection with
12 Ira's tying the shares or the money for Coin-Exch
13 to his obligations to pay tax; do you recall that
14 testimony?

15 A. Yes, he was very angry and he then
16 passed on the information of our tax lawyer to Ira
17 and he said, "Well, I'm not going to sort out
18 whatever tax problems you have but you can talk to
19 Andrew Sommer."

20 Q. Did that in fact happen to your
21 knowledge?

22 A. Yes.

23 Q. And what was the consequence of the
24 result of the communications of with Ira Kleiman
25 and Mr. Sommer?

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2 A. Well, I don't know how much they
3 talked for. I think they had e-mails back and
4 forth and I think they had phone bills, which we
5 ended up paying for, but Andrew Sommer said "This
6 is ridiculous. I can't do it this way or the way
7 he wants to do it. I can't give him any more
8 advice."

9 Q. And what was the basis for that to
10 your knowledge or your understanding? What was
11 the basis for Mr. Sommer -- what was your
12 understanding of the basis for Mr. Sommer's
13 conclusion of the communications with Ira on the
14 tax issue?

15 MR. BRENNER: Object to the form.

16 A. I really don't know. I mean
17 Andrew Sommer was very frustrated with him and
18 I think he was trying to get Andrew Sommer to give
19 him some sort of legal advice so that he wouldn't
20 have to pay tax and Andrew said, "I'm not doing
21 this anymore."

22 BY MS. MCGREGOR:

23 Q. Was Ira Kleiman acting on his own
24 behalf in connection with those communications to
25 your knowledge or was he acting on behalf of the

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2 estate with respect to his refusal to assume a tax
3 liability, to your knowledge?

4 MR. BRENNER: Object to the form.

5 A. He said, "I don't want to pay any
6 tax."

7 BY MS. MCGOVERN:

8 Q. Do you know, Miss Watts on the
9 issue of tax whether Dave Kleiman ever spoke to
10 you, or do you recall, rather, whether Dave
11 Kleiman ever spoke to you about his own tax
12 responsibility for income purportedly derived from
13 Bitcoin?

14 A. He never mentioned anything like
15 that to me. I do not know.

16 Q. And to your knowledge, do you know
17 whether Dave Kleiman ever spoke to you about tax
18 responsibilities for W&K Information Research
19 Defence LLC, a Florida corporation just to be
20 clear on the record, with respect to tax liability
21 for any income derived for Bitcoin purportedly
22 mined by that Florida entity?

23 A. I don't believe that they mined
24 anything, but, no he didn't state that to me at
25 all.

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2 Q. So you have no recollection of any
3 communications with Dave Kleiman about the
4 responsibility for W&K to pay tax with respect to
5 income purportedly mined by W&K in Florida; is
6 that a correct understanding?

7 A. Yes.

8 MR. BRENNER: Object to the form.
9 BY MS. MCGREGOR:

10 Q. Do you recall whether Dr. Wright
11 ever spoke to you about W&K's tax responsibility
12 with respect to any Bitcoin mine from that Florida
13 corporation or LLC?

14 MS. McGOVERN: I have no further
15 questions.

16 THE EXAMINER: Thank you. I don't
17 know whether you have any questions, any
18 re-examination.

19 MR. BRENNER: No, I'm done.

20 THE EXAMINER: You're done
21 completely. Right. Obviously it's time for the
22 court reporter to go. There are a couple of
23 things I just want to sort out as regards
24 finalising the deposition. Is there anything else
25 anybody wants to interject which requires the

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2 court reporter remaining, because I think it's
3 only fair to her that we said 7 o'clock. It is
4 now past that time.

5 MR. BRENNER: The only thing is,
6 when she sends me a rough or something, I will
7 send by e-mail the last exhibit that we had just
8 popped on the screen only, although we gave it a
9 marker. I will do that exactly as it was shown at
10 the deposition.

11 MR. FREEDMAN: Thank you.
12 Mr. Brenner, I would just say, if you wanted to
13 respond, so there is a record to Ms. McGovern's
14 comment about us agreeing to end the deposition at
15 7 p.m. I don't think that's accurate.

16 MR. BRENNER: I'll just say that we
17 agree to disagree but I'm not going to have this
18 fight while the court reporter is there.

19 MR. SAOUL: Allow me to just say
20 from an English perspective, it is our clear
21 understanding that an absolutely black and white
22 recorded in writing agreement was reached to start
23 at noon and conclude at 7.00 and if there is any
24 suggestion otherwise, then that can be taken up in
25 the English courts as well.

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2 MR. BRENNER: Absolutely, it can be
3 taken up. The e-mail exchange is colourful to say
4 the least but it is what it is.

5 THE EXAMINER: Right. So I thank
6 the court reporter for staying and wish her a good
7 journey home.

8 THE COURT REPORTER: Thank you. We
9 are going off the record at 7.06 p.m.

10 (Deposition concluded at 7.06 p.m.)

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RAMONA WATTS - CONFIDENTIAL
CERTIFICATE OF EXAMINER

The preceding pages of typescript were furnished to me by Amy Coley as containing her transcript of his notes of the evidence of RAMONA WATTS given upon his examination before me.

.....
Ms. Alison Green - Examiner

Dated this day of 2020

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CERTIFICATE OF WITNESS

I, RAMONA WATTS, am the deponent in the foregoing deposition. I have read the foregoing deposition and, having made such changes and corrections as I desired, I certify that the transcript is a true and accurate record of my responses to the questions put to me on 19th March, 2020.

Signed

NAME.....

Dated this day of 2020

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2 CERTIFICATE OF COURT REPORTER

3

4 I, Amy Coley, Accredited Court Reporter,
5 do hereby certify that I took the Stenograph notes
6 of the foregoing deposition, and that the
7 transcript thereof is a true and accurate record
8 transcribed to the best of my skill and ability.

9 I further certify that I am neither
10 counsel for, related to, nor employed by any of
11 the parties to the action in which the deposition
12 was taken, and that I am not a relative or
13 employee of any attorney or counsel employed by
14 the parties hereto, nor financially or otherwise
15 interested in the outcome of the action.

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22 AMY COLEY

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E R R A T A

(Please make any corrections here NOT in the transcript)

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