

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

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

-----x

IRA KLEIMAN, as the Personal
Representative of the Estate
of DAVID KLEIMAN, and W&K
Info Defense Research, LLC,
Plaintiffs,

v.

CRAIG WRIGHT,
Defendant.

-----x

C O N F I D E N T I A L

CONTINUED VIDEOTAPED DEPOSITION of
GAVIN ANDRESEN
Hadley, Massachusetts

Reporter: MaryJo O'Connor, RDR, RMR

Job No: 559472

Plaintiffs' Designations



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Thursday, February 27, 2020

11:13 a.m.

CONTINUED VIDEOTAPED DEPOSITION OF
GAVIN ANDRESEN, held at Courtyard Hadley
Amherst, 423 Russell Street, Hadley,
Massachusetts, pursuant to notice, before
MaryJo O'Connor, Registered Diplomat
Reporter, Registered Merit Reporter, and
Notary Public in and for the Commonwealth of
Massachusetts.

1 A P P E A R A N C E S

2

3 ON BEHALF OF THE PLAINTIFFS:

4 ROCHE CYRULNIK FREEDMAN

5 (Via Teleconference)

6 Southeast Financial Center

7 200 S. Biscayne Boulevard

8 Suite 5500

9 Miami, Florida 33131

10 VELVEL FREEDMAN, ESQ.

11 vel@rcfllp.com

12

13

14 ON BEHALF OF THE DEFENDANT:

15 RIVERO MESTRE LLP

16 2525 Ponce de Leon Boulevard, Suite 1000

17 Miami, Florida 33134

18 (305) 445-2500

19 BY: ZALMAN KASS, ESQ.

20 zkass@riveromestre.com

21

22

23 ALSO PRESENT:

24 Ira Kleiman

25 Mati Kiin - Video Technician

1 -----I N D E X-----

2

EXAMINATION of GAVIN ANDRESEN PAGE

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By Mr. Freedman 355

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9 -----EXHIBITS-----

10 ANDRESEN EXHIBIT PAGE

11 Exhibit 72 E-mail, Bates 293

12 GAVIN_00001821

13 Exhibit 73 E-mail, Bates 294

14 GAVIN_00001759 to

15 GAVIN_00001760

16 Exhibit 74 E-mail, Bates 351

17 GAVIN_00000023

18 Exhibit 75 Document entitled 351

19 "Non-Disclosure Agreement,"

20 Bates GAVIN_00000024 to

21 GAVIN_00000026

22

23

24

25

1 P R O C E E D I N G S

2 VIDEO TECHNICIAN: Good morning.

3 We are now on the record. This begins
4 media unit number one in the continuing
5 deposition of Gavin Andresen in the
6 matter of the Estate of David Kleiman,
7 et al., versus Craig Wright.

8 This matter is held in the
9 United States District Court in the
10 State of Florida. Today is February 27,
11 2020, and the time is 11:13 a.m.

12 Our deposition is being taken at
13 the Courtyard by Marriott Hadley-Amherst
14 located at 423 Russell Street, Hadley,
15 Massachusetts 01035, and at the request
16 of the firm Rivero Mestre & Castro.

17 My name is Mati Kiin. I'm the
18 videographer representing Magna Legal
19 Services, and our court reporter today
20 is MaryJo O'Connor, also representing
21 Magna Legal Services.

22 I will now ask counsel to
23 introduce themselves and their
24 affiliations, and we will get started.

25 MR. KASS: Zalman Kass for

1 Dr. Craig Wright.

2 MR. FREEDMAN: Velvel Freedman for
3 the Plaintiffs.

4 MR. KASS: Is there anybody else
5 on the phone?

6 MR. KLEIMAN: Ira Kleiman,
7 Plaintiffs.

8 VIDEO TECHNICIAN: I'll ask the
9 court reporter to please swear in our
10 witness, and we can proceed.

11 * * *

12

13 GAVIN ANDRESEN, Continued

14 having been satisfactorily identified by a
15 Massachusetts drivers license and duly sworn
16 by the Notary Public, was examined and
17 testified as follows:

18 EXAMINATION

19 BY MR. KASS:

20 Q. Good morning, Mr. Andresen. Thank
21 you for coming back. We appreciate that.

22 Just some preliminary matters --

23 MR. FREEDMAN: Zalman, I'm sorry,
24 I can't -- I can't really hear you. Can
25 you either project a little or get a

1 little closer to the phone?

2 MR. KASS: One second. Hang on.

3 We're going to do our best.

4 BY MR. KASS:

5 Q. All right. Mr. Andresen, since
6 you left the deposition yesterday and came to
7 the deposition today, did you speak to anybody
8 about either yesterday's deposition or today's
9 deposition?

10 A. No.

11 Q. Okay. Now, yesterday you
12 testified that a lot of people have claimed to
13 you that they are Satoshi, correct?

14 A. Correct.

15 Q. Did you ever attend proof sessions
16 with any of those other Satoshis?

17 A. No.

18 Q. Did you ever fly anywhere to meet
19 any of those other Satoshis?

20 A. No.

21 Q. So is it fair to say that when you
22 did fly to London to meet Dr. Craig Wright, you
23 were pretty convinced that he could be Satoshi?

24 MR. FREEDMAN: Objection.

25 A. Yes.

1 Q. And that was based on the e-mail
2 conversations that you had with him?

3 A. Yes.

4 Q. Which involved both his technical
5 knowledge, his discussions as to Bitcoin, and
6 his writing style?

7 A. Yes.

8 MR. FREEDMAN: Object to the form.

9 Q. Do you recall being asked
10 yesterday whether -- if you are aware if the
11 Court found that Craig committed perjury under
12 oath?

13 A. Am I aware?

14 Q. Do you recall being asked that
15 question?

16 A. I do recall being asked that
17 question, yes.

18 Q. All right. And do you recall
19 being asked a question whether Dr. Wright
20 submitted forged documents to the Court?

21 A. Yes, I do.

22 Q. Are you aware that those findings,
23 or that order, was later overturned by a higher
24 court?

25 A. No.

1 MR. FREEDMAN: Objection.

2 Mischaracterizes the order.

3 MR. KASS: No, keep it to form,
4 please.

5 MR. FREEDMAN: No, no. You're
6 totally mischaracterizing.

7 MR. KASS: Doesn't matter. Come
8 on, Vel, you were doing a lot of that
9 yesterday.

10 MR. FREEDMAN: No, not once.
11 Zalman, you know very well --

12 MR. KASS: Vel.

13 MR. FREEDMAN: -- that it doesn't
14 (inaudible) --

15 MR. KASS: Vel. Vel. Vel.
16 That's not how this works. I get to ask
17 the questions. You get to object to
18 form. Please keep it to that.

19 BY MR. KASS:

20 Q. How would you characterize
21 Dr. Craig -- how would you characterize the
22 Bitcoin community's view of Dr. Craig Wright?

23 A. I think, in general, most of the
24 Bitcoin community --

25 MR. FREEDMAN: Objection to form.

1 A. -- dislikes him. They think he's
2 a liar. They don't trust him. They don't
3 think he is Satoshi.

4 Q. Would you say that Dr. Craig
5 Wright is a controversial figure in the Bitcoin
6 community?

7 A. Yes. Definitely.

8 MR. FREEDMAN: Object to the form.

9 Q. And would it be fair to say that
10 there are many people who don't like Dr. Craig
11 Wright --

12 A. Yes.

13 Q. -- in the Bitcoin community?

14 A. Yes.

15 Q. And we previously talked about how
16 hacking is part of the Bitcoin community. It's
17 something that's not uncommon.

18 A. Yes.

19 MR. FREEDMAN: Objection.

20 Q. Would you be surprised if
21 Dr. Wright was hacked?

22 MR. FREEDMAN: Objection.

23 A. No.

24 Q. Now, yesterday you spoke about
25 somebody being a Bitcoin expert?

1 MR. FREEDMAN: Objection.

2 A. I believe you.

3 Q. Do you recall that?

4 A. I don't recall talking about a
5 specific person being a Bitcoin expert.

6 Q. Do you recall talking about
7 Andreas Antonopoulos?

8 A. Yes.

9 Q. Do you recall referring to him as
10 a Bitcoin expert?

11 A. I probably did.

12 Q. What are your criteria for someone
13 to classify somebody a Bitcoin expert?

14 A. I think a Bitcoin expert has a
15 very good understanding of the technical
16 details of how Bitcoin works. I don't think
17 you need to know all of the details.

18 Q. Okay.

19 A. But to have a good understanding
20 of kind of the Bitcoin system and how its
21 pieces fit together.

22 Q. Would it also include how the
23 system is used?

24 A. I think you can be a Bitcoin
25 expert without being an expert in all of the

1 different ways people use Bitcoin. I mean,
2 there are lots of different pieces of Bitcoin.
3 There is legal. You could be an expert on, you
4 know, how Bitcoin interacts with the legal
5 system. That doesn't necessarily make you the
6 kind of Bitcoin expert that I think of when I
7 think of a Bitcoin expert. And same thing for
8 if you think of, you know, how are people using
9 Bitcoin for cross-border transactions. You
10 might be that kind of expert.

11 But when I say Bitcoin expert, I'm
12 talking mostly about geeks like me and having a
13 technical understanding of Bitcoin.

14 Q. How would you describe
15 Dr. Wright's technical understanding of
16 Bitcoin?

17 A. Dr. Wright seems to have a very
18 good understanding of Bitcoin.

19 Q. Would you consider him a Bitcoin
20 expert?

21 A. Yes. I think I would.

22 Q. What coding language was original
23 Bitcoin software coded in?

24 A. C++.

25 Q. So whoever Satoshi is, what coding

1 language would they necessarily have to know
2 how to code in?

3 A. C++.

4 Q. Do you recall yesterday the term
5 money men being thrown around?

6 A. I do, yes.

7 MR. FREEDMAN: Objection.

8 Q. Do you recall who those money men
9 are?

10 MR. FREEDMAN: You just missed an
11 objection, Madam Court Reporter. Sorry.

12 Q. I believe I have a standing
13 question, which is: Do you recall who they
14 are?

15 A. I think their names were Stefan
16 and Rob. And I think there was one other
17 person, and I don't recall who had what role.

18 Q. Okay. And how did they get that
19 moniker, money men?

20 A. One or more of them were presented
21 to me as owning an investment firm or a venture
22 capital firm.

23 Q. And do you know specifically what
24 their relationship was with Dr. Craig Wright?

25 A. I'm trying to remember what I was

1 told. I believe I was told that they were --
2 they had some sort of business arrangement, and
3 I don't know the details of that business
4 arrangement.

5 Q. Okay. So would it be more
6 accurate to call them businessmen?

7 A. Sure.

8 Q. All right. Do you have any
9 independent knowledge as to how much money they
10 have?

11 A. I don't have any independent
12 knowledge as to how much money they have.

13 Q. So it would be fair to say that
14 you just know there was some sort of business
15 relationship with at least one or more of them
16 and Dr. Wright?

17 A. Yes. That's what I was told.

18 Q. Okay. Do you know anything about
19 Dave Kleiman's coding abilities?

20 A. No.

21 Q. Do you know anything about his
22 programing abilities?

23 A. No.

24 Q. Do you have any personal knowledge
25 as to whether Dave was Satoshi?

1 A. No.

2 Q. Do you have any personal knowledge
3 as to whether Dave worked on the Bitcoin
4 software?

5 A. No.

6 MR. FREEDMAN: Objection to form.

7 Q. Now, we discussed yesterday that
8 some things could impact the ability to recall
9 certain events, correct?

10 A. Yes.

11 Q. And one thing was the passage of
12 time?

13 A. Yes.

14 Q. And to being jet lagged?

15 A. Yes.

16 Q. Would you agree to me -- agree
17 with me, though, that if something's
18 memorialized close to the actual event that
19 it's more likely that is accurate than possibly
20 a later memory?

21 And I can rephrase that if that's
22 a confusing question.

23 MR. FREEDMAN: Objection.

24 A. No, I agree with that.

25 MR. KASS: I'm going to introduce

1 as Exhibit 72. And, Vel, this is the
2 one that ends -- it's a GAVIN, and it
3 ends in 1821.

4 MR. FREEDMAN: That's a new
5 exhibit?

6 MR. KASS: Yes.

7 MR. FREEDMAN: It's one of the
8 ones you sent me?

9 MR. KASS: Correct.

10 (Document marked for
11 identification as Andresen Exhibit 72)

12 Q. Mr. Andresen, do you recognize
13 this document?

14 A. Yes.

15 Q. What is it?

16 A. It's an e-mail I received May 8,
17 2016, from somebody saying that they are Ira
18 Kleiman.

19 Q. Okay. And what's the e-mail
20 address? Or let me rephrase that.

21 So you see under the From, it says
22 something?

23 A. From says "Ira Private,
24 iradavid2009@gmail.com.

25 Q. Now, that "private" part, do you

1 know how that got there?

2 A. Well, you can you choose any user
3 name you like.

4 Q. So is that something you chose or
5 he chose?

6 A. That's something that he would
7 have chosen.

8 Q. Okay. All right. And in this
9 e-mail he's reaching out to you, and he says
10 he's David's brother, and he has some
11 questions, right?

12 A. Yes.

13 MR. FREEDMAN: Objection.

14 Q. We're going to move on to another
15 document, which I am going to mark as
16 Exhibit 73.

17 (Document marked for
18 identification as Andresen Exhibit 73)

19 Q. Do you recognize this document?

20 MR. FREEDMAN: Sorry, Zalman, this
21 is Bates 1759.

22 A. Yes. I recognize this document.

23 Q. And what is it?

24 A. This is another e-mail from Ira to
25 me.

1 Q. Okay. And embedded halfway
2 through this document, do you see an e-mail
3 from yourself to Ira?

4 A. Yes, I do.

5 Q. Okay. And let's go to the bottom
6 of the page, and under the e-mail that's from
7 Ira to you and is dated May 10th and the time
8 is 8:18, do you see the last paragraph in that
9 e-mail starts with the "If"?

10 A. Yes.

11 Q. Are you able to read that
12 paragraph.

13 A. Sure. "If you are unable to speak
14 about Craig specifically, I understand. I just
15 wanted to know if you knew my brother or have
16 any knowledge about him being part of a team
17 that created Bitcoin."

18 Q. Okay. And this -- again, this
19 e-mail is in May 10. And approximately how
20 long after that meeting in London with
21 Dr. Craig Wright?

22 A. Let's see. The meeting was April
23 7th? 6th? So approximately a month.

24 Q. So this is about a month after,
25 okay.

1 And to the extent you had any
2 conversations with Craig Wright about Dave's
3 role as part of Satoshi, it happened in London.
4 As far as your recollection.

5 A. As far as my recollection, yes.

6 Q. Now, let's look at your response,
7 which is at 8:42. So shortly after.

8 Could you read your response?

9 A. "Craig said that he worked with
10 David, and I don't have any reason to think
11 he's lying about that. Beyond that" -- do you
12 want me to go on?

13 Q. Yes, please.

14 A. "Beyond that, I don't know much -
15 and, frankly, I'm happy to let the
16 investigative reporters or amateur detectives
17 try to piece together the truth."

18 Q. So is it fair to say that Ira
19 specifically asked you whether you knew if
20 David had anything to do with Bitcoin and your
21 response is, I don't know?

22 A. That's correct.

23 Q. So based on that, is it also fair
24 to say that it's not very likely that you were
25 informed him being part of Satoshi when you met

1 with Dr. Wright?

2 MR. FREEDMAN: Objection.

3 Q. Well, it doesn't make it less
4 likely.

5 A. Yes, it does make it less likely.

6 Q. Okay. Other than these two
7 e-mails, and for that it's going to be Exhibit
8 72 and 73 with Ira Kleiman, did you have any
9 other contact with Ira Kleiman?

10 A. I don't recall.

11 Q. Did you ever speak to him over the
12 phone?

13 A. No.

14 Q. Now, I believe you testified
15 yesterday that you spent a portion of 2010
16 working with Satoshi on the Bitcoin code.

17 A. Yes.

18 Q. And do you consider your work that
19 you did on that code -- strike that question.

20 How important was the work that
21 you did on the Bitcoin code?

22 A. How important was the work I did
23 on the Bitcoin code. On a scale of 1 to 10?

24 Q. Well, let me ask you like this.

25 Had you not done that work with the Bitcoin, do

1 you believe that the Bitcoin code would have
2 functioned and taken off?

3 A. Ah -- ah -- it's hard to know. I
4 like to think that I helped it take off faster.
5 I think it probably would have taken off even
6 without my contribution, because I think
7 somebody else would have stepped up and
8 nurtured the code.

9 Q. So is it fair to say that another
10 person was necessary, it may just not have been
11 you.

12 A. Yes, I think that would be fair to
13 say.

14 Q. Now, after the fact, would you
15 consider the work that you did instrumental in
16 helping the Bitcoin code take off?

17 A. Yes. I think actually some things
18 that I did that weren't working on the Bitcoin
19 code were probably more instrumental. Things
20 like, you know, talking to reporters and being
21 the public face of Bitcoin. I think that might
22 have actually had a bigger impact than the code
23 that I contributed.

24 Q. So would it be fair to say that
25 you did two things: There is the coding, and

1 then the sort of the Bitcoin promoting?

2 A. Yes.

3 Q. Do you feel that Satoshi owes you
4 anything for those two things that you did?

5 A. No.

6 MR. FREEDMAN: Objection.

7 Q. Why?

8 A. I did those things voluntarily. I
9 didn't do them in expectation that any
10 particular person would give me something. And
11 I have certainly been, since Bitcoin has become
12 a success, I've been well-compensated just by
13 the fact that I obtained some Bitcoin in 2010
14 and now they're worth a lot of money.

15 So, you know, working on -- that's
16 part of the beauty of the Bitcoin system is the
17 incentives are there for people to want to make
18 it a success. Once you have some Bitcoin, you
19 want to do what you can to make it more
20 valuable. So you want the system to succeed.

21 Q. Is it common -- and is -- is it
22 common or -- yeah. Is it common on certain
23 types of software where people contribute and
24 do work but not necessarily are they expecting
25 to be financially compensated?

1 A. That has become more common as
2 open-source software has become a popular means
3 of doing software around the world.

4 Q. And was Bitcoin released as
5 open-source software?

6 A. Yes. Bitcoin was open-source
7 software from the start.

8 Q. Okay. Do you recall testifying
9 yesterday that you didn't send any money to
10 Satoshi?

11 A. Yes, I do.

12 Q. Okay. I just wanted to know if
13 you could help clear up something for me,
14 because later on we looked at an e-mail where
15 it shows that you sent some Bitcoin to Block 9
16 or Block 10.

17 A. Yes.

18 Q. And I believe you also testified
19 that that block was known to be Satoshi's
20 block?

21 A. Yes.

22 Q. How do you reconcile those
23 statements?

24 A. The -- in my mind, the pseudonym
25 Satoshi is the person I was communicating with

1 in 2010 and 2011.

2 Q. Okay.

3 A. So when I was asked the question
4 had I sent Bitcoin to Satoshi, my mind was
5 saying the Satoshi of 2010 and 2011. And so
6 the transaction that I made later, I think of
7 as a transaction to Craig Wright, not the
8 pseudonym Satoshi.

9 So I was thinking of during my
10 work with Satoshi, did we ever exchange
11 Bitcoin.

12 Q. Okay. So is it fair to say you
13 were focusing more on the person or the
14 pseudonym, not necessarily the account?

15 A. Yes.

16 Q. And I appreciate that. Thank you
17 for clarifying that.

18 Do you recall testifying yesterday
19 that you read an article I believe by someone,
20 his last name is Lerner, about some Satoshi
21 Pattern?

22 A. Yes.

23 Q. Okay. And that article has
24 something to do with nonce values.

25 A. Yes.

1 Q. Other than reading that article,
2 do you have any personal knowledge about the
3 analysis done in that article?

4 A. No.

5 Q. Now, I'm going to turn to what is
6 previously marked as number 2. So going all
7 the way down to the bottom of the pile.

8 MR. KASS: And, Vel, just to make
9 it easier, it's GAVIN_1296.

10 MR. FREEDMAN: Is that a new
11 document?

12 MR. KASS: No. This was
13 introduced yesterday by you as
14 Exhibit 2.

15 MR. FREEDMAN: Wait, hold on.
16 GAVIN_1296?

17 MR. KASS: Yes.

18 MR. FREEDMAN: One second please.

19 MR. KASS: I could describe it for
20 you, but I just don't want to coach.

21 MR. FREEDMAN: I got it.

22 MR. KASS: Okay.

23 BY MR. KASS:

24 Q. Do you recall this document?

25 A. Yes.

1 Q. Do you recall testifying about it
2 yesterday?

3 A. Yes.

4 Q. And do you recall being asked
5 whether Dr. Wright had applied for a job at the
6 foundation where you were working?

7 A. Yes.

8 Q. Now, I would like you to actually
9 look at the e-mail from Dr. Wright, and could
10 you point to the portion where he says he's
11 applying for a job?

12 A. He does not say that he's applying
13 for a job.

14 Q. And, in fact, does he say, "I do
15 not want to be paid"?

16 A. He does say "I do not want to be
17 paid," yes.

18 Q. Does it appear more that he's just
19 asking to collaborate with you?

20 A. Uh --

21 Q. When you received this, what did
22 you interpret it as?

23 A. When I received --

24 MR. FREEDMAN: Objection.

25 A. I received this from the secretary

1 of the Bitcoin Foundation --

2 Q. Mm-hmm.

3 A. -- and she presented it as a
4 resume. She used the term "resume." And so,
5 therefore, I assumed that it was somebody
6 looking for a job.

7 I -- at the time, we weren't
8 looking for anybody. And so until discovery
9 from the subpoena --

10 Q. Sure.

11 A. -- I hadn't thought about this
12 document at all.

13 Q. Okay. And now that you've taken a
14 second to look at this document today, do you
15 still believe it would be accurate to state
16 that Dr. Wright was looking for a job with the
17 foundation?

18 A. No. Now that I read it closely, I
19 think it would be more accurate to say he was
20 looking for some sort of collaboration.

21 Q. And one other thing. Do you
22 actually know if it was Dr. Wright who sent
23 this e-mail?

24 A. No. I don't know.

25 Q. And it would be fair to say

1 because you just see an e-mail address, you
2 don't know who actually typed it or sent it?

3 A. Correct. I have no idea if
4 craig@panopticopticrypt.com is actually the
5 Dr. Craig Wright I met in London.

6 Q. And even if it was, you still
7 don't know who actually typed it and sent it,
8 correct?

9 A. Correct.

10 Q. Now, I'm going to go to Exhibit 9
11 and previously marked yesterday.

12 MR. KASS: And, Vel it's
13 GAVIN_1077.

14 MR. FREEDMAN: Got it.

15 Q. Now, yesterday do you recall being
16 asked a number of questions about this
17 document?

18 A. Do I recall being asked a number
19 of -- I was probably asked a number of
20 questions about this document.

21 Q. Okay. And I'll just go through
22 one or two of them, maybe that will jog your
23 memory.

24 A. Sure.

25 Q. Do you recall being asked what

1 some of the incredible mistakes were? First
2 paragraph.

3 A. Yes.

4 Q. And then going to the
5 fourth-from-the-last paragraph where it says,
6 "It was a front in some ways"?

7 A. Yes.

8 Q. And then drop one paragraph down,
9 "The ones that matter remain hidden." Do you
10 recall being asked about that phrase?

11 "The ones that matter remain
12 hidden," that's the third-from-the-bottom
13 paragraph.

14 A. Do I remember being asked that?

15 Q. Yes.

16 A. Not really, no.

17 Q. All right. Then how about going
18 down to the second page where the -- closer to
19 the top of the page, the paragraph starts,
20 "Then, none of this is about money."

21 Do you recall being asked about
22 that?

23 A. I think I do recall a question
24 about that.

25 Q. Okay. And then at the end of the

1 paragraph, do you recall a question that was
2 about the phrase "I have access to systems that
3 transfer more value and transactions a day than
4 the existing BTC network does in a year"?

5 A. Yes, I do remember a question
6 about that.

7 Q. And do you recall being asked
8 about "I want to stay as close to the edge as I
9 can without going over."

10 A. I definitely remember a question
11 about that.

12 Q. And how about the next line,
13 "Frustration (should) be my middle name"?

14 A. Yes, I remember that.

15 Q. Okay. And now I'm going to stop
16 now, because I don't think we have to go
17 through every single one. But my question for
18 you is: To the extent you were asked any
19 question about the portion of the e-mail
20 drafted by Craig, right?

21 MR. FREEDMAN: Objection. Form.

22 Q. Do you have -- is there any way
23 that you could know what Craig actually meant?

24 MR. FREEDMAN: Objection.

25 A. You certainly can't read people's

1 minds. So, no.

2 Q. So would it be fair to say that,
3 at best, it is your interpretation of what you
4 think Craig may have meant?

5 A. Yes.

6 Q. Okay. And would that go for all
7 e-mails that were authored by Dr. Wright?

8 A. Sure. It's always possible --
9 MR. FREEDMAN: Objection.

10 A. -- to misinterpret what somebody
11 writes.

12 Q. Okay. Now, let's go to
13 Exhibit 10, which was previously marked
14 yesterday, and I will have the Bates number in
15 a second. It is GAVIN_2007.

16 MR. FREEDMAN: Got it. Thanks.

17 MR. KASS: Sorry?

18 MR. FREEDMAN: I've got it. Thank
19 you.

20 MR. KASS: Okay.

21 Q. I'm not sure that's the correct
22 document. Exhibit 11.

23 A. Oh, 11.

24 Q. That was my error, but I did mean
25 11, so yes. That was on me.

1 Okay. Do you recall being asked
2 questions about this document yesterday?

3 A. Vaguely, yes.

4 Q. And do you recall testifying that
5 this was a conversation that you copied from
6 Reddit and then pasted it into a Word document?

7 A. Yes.

8 Q. And then produced it in the
9 litigation?

10 A. Yes.

11 Q. Do you know when you produced it,
12 if it was a Word document or -- do you know
13 what type of document it was, what format it
14 was, when you produced it?

15 A. I believe it's a plain text file.

16 Q. Okay. Now, could plain text get
17 modified?

18 A. Sure.

19 Q. Is it easy to modify plain text?

20 A. Yes, it's very easy.

21 Q. Okay. So is it possible that
22 between when you copied into plain text and it
23 was produced to you as Exhibit 11, that a
24 change was made to it?

25 A. It's possible.

1 Q. Now, my other question -- and you
2 cannot state definitively that this is exactly
3 how it appears on the Reddit page for that
4 reason?

5 A. Correct. I still have a copy of
6 this on my laptop, so I could go back and check
7 line by line.

8 Q. Sure. But as you sit here right
9 now.

10 A. But as I sit here right now, no.

11 Q. Now my other question is: Is
12 there a reason why this was produced as text as
13 opposed to just a printout of your Reddit page?

14 A. It was easiest for me to select
15 all of the -- it's a fairly long thread. So to
16 produce screenshots would involve more work
17 than just selecting all of the text, copying
18 and pasting.

19 Q. Understood. Thank you for
20 clarifying that.

21 MR. KASS: Now, I'm going to
22 Exhibit 11. Vel, that's "The Satoshi
23 Affair" and docket exhibit.

24 THE WITNESS: 13.

25 MR. KASS: Yes, number 13.

1 MR. FREEDMAN: Got it. Thank you.

2 BY MR. KASS:

3 Q. All right. Do you recall being
4 asked questions about this document?

5 A. Yes.

6 Q. And do you recall being shown a
7 series of quotations made by people?

8 A. Yes.

9 Q. Now, I'm going to go over some of
10 them. I just have a few questions.

11 Oh, and do you recall testifying
12 that some of those statements were consistent
13 with what doctor -- what you believe Dr. Wright
14 had told you?

15 A. I think I was told that.

16 Q. So my question for you is when you
17 say something is consistent, what does that
18 mean? I just want to make sure we're using the
19 same terminology.

20 A. Consistent means there's no
21 conflict. It's a synonym for consistent. It
22 means --

23 Q. Let me ask you a question like
24 this. If I told you I came here in a car and
25 someone else told you the car was green, is

1 that a consistent statement --

2 A. Yes.

3 Q. -- in your mind?

4 A. Yes, that's consistent. It's just
5 more detail in one statement than the other.

6 Q. Okay. So by "consistent," you
7 mean is it's not directly conflicting with
8 something else?

9 A. Correct.

10 Q. Okay. So it doesn't mean I was
11 told something of a similar substance.

12 A. Uh. Yes. I mean, something is
13 inconsistent if two things disagree with each
14 other.

15 Q. Okay.

16 A. Otherwise, they are consistent.

17 Q. So as long as it's not a direct
18 disagreement, it's consistent?

19 A. Yes.

20 Q. Okay. So let's turn to Page 27.
21 That's going to be on the top, the 27 of 96.

22 And if you go to the
23 second-to-the-last paragraph, it starts -- the
24 line -- the sentence starts with "If I'd come?"

25 A. I see, yes.

1 Q. So it says, "'If I'd come out
2 originally as Satoshi without Dave, I don't
3 think it would have gone anywhere. I've had
4 too many conversations with people who get
5 annoyed because it's me.'"

6 Now, do you believe stating that
7 that was consistent with something that
8 Dr. Wright had told you?

9 A. I don't recall.

10 Q. You could have?

11 A. I could have, sure.

12 Q. Now, if you did -- and that's just
13 in the transcript. I mean, what I had said is
14 what it says.

15 A. I believe you.

16 Q. I'm not trying to trick you.

17 So all of your -- so, essentially,
18 would it be fair to say all we really know from
19 that is that Craig Wright didn't say Dave isn't
20 Satoshi?

21 MR. FREEDMAN: Objection to form.

22 Q. Meaning -- well, what would
23 something that Craig would have to state to be
24 that was inconsistent with this statement?

25 MR. FREEDMAN: Objection to form.

1 A. I'm not sure I'm understanding the
2 question.

3 Q. Okay. So I'm trying -- okay, so
4 let's see if we can work this through.

5 A. Okay.

6 Q. When you state "It's consistent
7 with what he told you," what does that mean?

8 MR. FREEDMAN: Objection to form.

9 A. I mean, I know that Craig -- or I
10 was told that Craig and Dave worked together.

11 Q. All right. And we saw that in the
12 e-mail from you to Ira, correct?

13 A. Yes. I mean, when I say that if
14 this statement, "'If I'd come out originally as
15 Satoshi without Dave, I don't think it would
16 have gone anywhere," um -- I mean, the fact
17 that they worked together and he's talking
18 about Dave and Satoshi together, that's
19 consistent, right? They had some relationship
20 around that time.

21 Q. So they had some relationship. It
22 could have happened. He didn't tell me
23 anything that would say it would be impossible
24 to happen; is that fair?

25 A. That what would be impossible to

1 happen?

2 Q. That Craig didn't say anything
3 saying I never worked with Dave, because then
4 it would be inconsistent.

5 A. Correct.

6 Q. All right.

7 MR. FREEDMAN: Objection.

8 Q. So all you're stating is that
9 because -- so it would be fair to say Dave told
10 you he had a working relationship with Craig,
11 right? And we know that --

12 MR. FREEDMAN: Objection.

13 Q. -- Craig said he was Satoshi.
14 Craig said he himself was Satoshi, correct?

15 A. Correct. Yes.

16 Q. So you're saying --

17 MR. FREEDMAN: Objection.

18 Q. -- it's possible that he worked
19 with Dave as Satoshi.

20 A. Yes.

21 MR. FREEDMAN: Objection.

22 Q. Now, let's turn to Page 31 of 96.
23 And now we're going to go to the line that
24 starts -- the paragraph that starts with "The
25 subject."

1 A. Okay.

2 Q. Now, I'm going to read a portion
3 of that paragraph, and then I'm going to ask
4 you if you recall testifying about it.

5 "In an e-mail from Wright dated
6 12 March 2008. 'I need your help editing a
7 paper I am going to release later this year. I
8 have been working on a new form of electronic
9 currency. Bit cash, Bitcoin ... you are always
10 there for me Dave. I want you to be part of it
11 all. I cannot release it as me. GMX,
12 vistomail and Tor. I need your help and I need
13 a version of me to make this work that is
14 better than me.'"

15 Do you recall testifying --

16 MR. FREEDMAN: Objection.

17 Q. -- about that paragraph yesterday?

18 A. Yes. Vaguely.

19 Q. Do you recall what your testimony
20 was?

21 A. No, I don't recall what I was
22 asked, and I don't recall what I answered.

23 Q. Okay. Well, it's a good thing
24 that I have the transcript from yesterday, so
25 I'm going to ask you and see if what I have

1 written if you recall that being your response.

2 Is that --

3 MR. FREEDMAN: Objection. Zalman,
4 the transcript from yesterday is a
5 rough. That specifically says it's not
6 to be relied on.

7 MR. KASS: I know. I'm not
8 relying it. I'm just asking him if it
9 refreshes his recollection.

10 MR. FREEDMAN: You can't ask if
11 the transcript that is not a proper
12 transcript refreshes the witness's
13 recollection.

14 MR. KASS: I could. And --

15 MR. FREEDMAN: You can ask him
16 what he testified.

17 MR. KASS: No, you can --

18 MR. FREEDMAN: You can do whatever
19 you want.

20 MR. KASS: Exactly. And you can
21 make an objection to form.

22 MR. FREEDMAN: No, no. This is
23 not a form objection. You're presenting
24 improper documents.

25 MR. KASS: Vel.

1 MR. FREEDMAN: The document
2 specifically says --

3 MR. KASS: Vel, please stop --
4 stop your speaking objections.

5 MR. FREEDMAN: Zalman, this is not
6 a speaking objection.

7 MR. KASS: What is it?

8 MR. FREEDMAN: It's not an
9 objection to the question, how you
10 raised it. It's an objection that
11 relates to your presenting the witness
12 with a transcript that specifically says
13 it's rough, it cannot be relied on.

14 MR. KASS: Vel.

15 MR. FREEDMAN: You're trying to
16 use that to refresh -- Zalman, let me
17 finish making the record.

18 MR. KASS: It's an improper --

19 MR. FREEDMAN: And you're trying
20 to --

21 MR. KASS: -- record.

22 MR. FREEDMAN: Zalman, you're
23 specifically trying to use that as a way
24 to refresh. That document says it
25 shouldn't be relied on to refresh a

1 witness's recollection of what was
2 stated therein. That's not a form
3 objection. The objection is conduct in
4 the deposition. I made the record. Now
5 do what you like.

6 MR. KASS: Vel, please do not do
7 that again. You know that's
8 inappropriate. You know the only thing
9 you're allowed to say is objection to
10 form. If you think a question is
11 improper, object to form and make that
12 argument in front of the Judge. Okay?
13 That's not proper conduct, and you know
14 it.

15 MR. FREEDMAN: I disagree with
16 your statement. I think it's a
17 perfectly appropriate objection of
18 conduct, but go ahead.

19 MR. KASS: All right. The record
20 is what it is, Vel.

21 MR. FREEDMAN: If you don't think
22 it's appropriate, Mr. Kass, you can
23 raise it with the Court.

24 MR. KASS: I don't have to raise
25 anything. This is my depo, Vel.

1 MR. FREEDMAN: Okay. I'm making a
2 record.

3 MR. KASS: Improper record.

4 BY MR. KASS:

5 Q. Do you recall being asked: Is
6 this -- referring to that phrase -- consistent
7 with the story told you about Craig's and
8 Dave's collaboration?

9 A. No, I don't recall being asked
10 that. But I believe that I was if it's in the
11 transcript.

12 Q. Okay. And do you recall answering
13 yes to that?

14 A. Again, no, I don't recall. But I
15 believe you.

16 Q. Okay. Now --

17 MR. FREEDMAN: Objection.

18 Q. -- if you did answer yes -- let me
19 rephrase this.

20 Right now, do you believe that
21 this paragraph is in fact consistent with what
22 Dr. Wright told you?

23 A. Yes.

24 Q. And is it consistent, again, based
25 on the fact that Craig said him and Dave worked

1 together?

2 A. Yes.

3 Q. And consistent because --

4 MR. FREEDMAN: Objection.

5 Q. -- Dr. Wright says that Dr. Wright
6 is Satoshi?

7 A. Yes.

8 MR. FREEDMAN: Objection.

9 Q. Is there any reason that you -- is
10 there any other reason that you believe this is
11 consistent with what he previously told you?
12 He, being Dr. Wright.

13 MR. FREEDMAN: Objection.

14 A. Can you ask the question again?
15 Is there any --

16 Q. That's fine. I'm going to strike
17 that question. Don't worry. We can move on.

18 A. Okay.

19 Q. Let's go on to Page 36. Let's go
20 to -- yup. Let's go to the last paragraph.

21 Now, I'm going to read a sentence.
22 It's "I asked Wright about this and he told me
23 it was true that his and Kleiman's mining
24 activity had led to a complicated trust."

25 Is this consistent with what you

1 believe Dr. Wright told you in the past?

2 A. Sure. Yes.

3 Q. And in what way is it consistent?

4 A. Well, I don't think I had ever
5 heard about any mining activity, but it's
6 certainly consistent that he and Dave had some
7 sort of relationship.

8 Q. And, therefore, this could have
9 happened?

10 A. Therefore this could have
11 happened, sure. It's consistent.

12 Q. Right. But he never actually told
13 you that it did happen, right?

14 A. No, not to my recollection.

15 Q. Let's go to Page 76. "'But you
16 can'" -- I am going to read. "'But you can
17 say, hand on my heart, I am Satoshi Nakamoto?'"

18 And then you have a response. "'I
19 was the main part of it. Other people helped.
20 At the end of the day, none of this would have
21 happened without Dave Kleiman, without Hal
22 Finney, and without those who took over - like
23 Gavin and Mike.'"

24 So, first of all, just assuming
25 that this is -- do you know whether this is an

1 accurate statement by Dr. Wright?

2 A. No.

3 Q. Assuming it is an accurate
4 statement, does it appear that Dr. Wright
5 believes that you were instrumental in
6 Bitcoin's success?

7 A. Yes.

8 MR. FREEDMAN: Objection.

9 Q. Now, do you believe that this
10 paragraph is consistent with what Dr. Wright
11 had told you in the past?

12 A. Yes.

13 Q. Now, with regards to that it
14 couldn't have happened without Dave Kleiman,
15 how is that consistent with what he had told
16 you?

17 A. Again, it's consistent because I
18 was told they worked together. Beyond that, I
19 don't think I have any direct knowledge of, you
20 know, how Dave Kleiman might have been
21 instrumental.

22 Q. So, essentially, it's consistent
23 because it could have happened?

24 A. Yes.

25 Q. Okay. I think that's it with this

1 exhibit.

2 THE WITNESS: Can we take a break?

3 MR. KASS: Of course, yes. Any
4 time you want to take a break, gladly.

5 Okay. Let's take a five- to
6 ten-minute break.

7 VIDEO TECHNICIAN: The time is
8 12:02 p.m. We are now off the record.

9 (Proceedings recessed at
10 12:02 p.m., and reconvened at 12:08
11 p.m.)

12 VIDEO TECHNICIAN: The time is
13 12:08 p.m. We're back on the record.

14 MR. FREEDMAN: This is Vel
15 Freedman. I just want to state for the
16 record that during the break, the court
17 reporter and the videographer mentioned
18 that there are some issues hearing the
19 objections that are being made, an issue
20 with the speakerphone going on mute when
21 multiple people are talking. We are
22 going to try to monitor the realtime
23 transcript and make sure they are there,
24 but it's not always possible. And so
25 we're not exactly sure how to deal with

1 the situation, but we just want to make
2 a record to reflect that not all
3 objections are coming through.

4 MR. KASS: All right. And, Vel, I
5 understand what you just raised, and I
6 just ask if you could do your best that
7 if there is an objection and you don't
8 note it on the realtime, if you could
9 just try to make it known that it's not
10 there, and then we'll just deal with it
11 as necessary.

12 MR. FREEDMAN: Absolutely. I'm
13 just looking at documents and taking
14 notes. I can't always look at the
15 realtime, but I'm going to try that.

16 MR. KASS: Okay.

17 BY MR. KASS:

18 Q. You had previously testified that
19 a bunch of statements were consistent because
20 Dr. Wright had told you he had worked with
21 Dave. Is that accurate?

22 MR. FREEDMAN: Objection.

23 A. Yes.

24 Q. Do you know the nature of their
25 relationship?

1 A. No.

2 Q. Do you know if one was an employee
3 of the other?

4 A. No.

5 Q. Do you know if one was an
6 independent contractor of the other?

7 A. No.

8 Q. Do you know if one was
9 volunteering?

10 A. No.

11 Q. Do you know if there was a
12 partnership?

13 A. No.

14 Q. Now, I'm going to ask you to turn
15 to Exhibit 16.

16 MR. KASS: And, Vel, that's
17 GAVIN_0622. And it was introduced by
18 you yesterday.

19 MR. FREEDMAN: Got it.

20 Q. Do you recall being shown this
21 e-mail yesterday?

22 A. Yes.

23 Q. Okay. And do you recall who you
24 were communicating with in this e-mail?

25 A. This is Uyen Nguyen [win-win]. I

1 believe they -- well, they said they were
2 somebody named Uyen Nguyen.

3 Q. Do you know who Uyen Nguyen is?

4 A. No.

5 Q. Do you know if Uyen Nguyen has any
6 relationship to Dr. Craig Wright?

7 A. No.

8 Q. So is it fair to say this is just
9 an e-mail that you received from a person who
10 was unknown to you?

11 A. Yes.

12 Q. Do you know whether any of the
13 information that is contained in this e-mail
14 exchange is true?

15 A. No.

16 Q. Do you have any personal knowledge
17 about the information that is contained in this
18 e-mail exchange?

19 A. No.

20 Q. And so, for example, when it says
21 on the second paragraph from the top, first
22 word says, "nLocktime is what controls a
23 trust," do you know if that's true?

24 A. No.

25 Q. Do you know anything about this

1 trust?

2 A. No.

3 Q. Do you know what controls the
4 trust?

5 A. No.

6 Q. So is it fair to say that when you
7 were being asked questions yesterday about this
8 document, you were just reading off an e-mail?

9 A. Uh, yes.

10 MR. FREEDMAN: Objection.

11 A. And, well -- and assuming that the
12 information in the document was true, I was
13 answering questions about what that would mean.

14 Q. All right. And when you say
15 "answering questions about what that would
16 mean," does that mean what your interpretation
17 of what you think this e-mail means?

18 A. Yes.

19 Q. Now, I want to turn to what has
20 previously been marked as Exhibit 23, and that
21 ends in -- it's a GAVIN, and it ends with 0047.

22 Do you recall being shown this
23 e-mail yesterday?

24 A. Yes.

25 Q. And do you recall being asked some

1 questions about this e-mail?

2 A. Vaguely, yes.

3 Q. Okay. And do you see where the
4 e-mail -- and who is this e-mail from?

5 A. Stefan Matthews.

6 Q. Now, do you see on the first line
7 it says, "He has agreed to sign a new message
8 twice, once with block 1 and once with block 9
9 keys"?

10 A. Yes.

11 Q. Do you recall being asked whether
12 that should have been relatively simple to do?

13 A. I think it was a conditional, if
14 he has the private keys, would that be a simple
15 thing to do.

16 Q. Okay.

17 A. And I believe I answered yes.

18 Q. Now, I'm going to ask the reverse
19 conditional. If he doesn't have the private
20 keys, would that have been something hard to
21 do?

22 A. It would be impossible.

23 Q. So right now, you do not -- and do
24 you know whether he in fact -- he, being
25 Dr. Wright -- in fact had the keys on May 2,

1 2016?

2 A. I don't know.

3 Q. So are you able to testify as to
4 whether this would have been an easy thing for
5 him to do -- to have done?

6 MR. FREEDMAN: Objection.

7 A. Again --

8 Q. I can rephrase it if that's...
9 I'll rephrase it. So I'm removing
10 a conditional. I'm not saying you did. I'm
11 saying --

12 A. You're removing a conditional.

13 Q. Right now based on the knowledge
14 you had on that date, could you state with any
15 certainty whether it would have been easy for
16 Dr. Wright to do?

17 A. No.

18 MR. FREEDMAN: Objection.

19 MR. KASS: Vel, what's the basis
20 for that objection?

21 MR. FREEDMAN: I just don't
22 understand the question.

23 MR. KASS: Okay.

24 MR. FREEDMAN: I'm not sure the
25 witness does, either.

1 MR. KASS: Well, he answered, so I
2 think he did.

3 MR. FREEDMAN: Oh. He answered
4 what he thinks you said. I'm not sure
5 what he answered is what you asked.

6 MR. KASS: That's fine. I just
7 wanted to know what your basis was.

8 MR. FREEDMAN: I've seen the
9 transcript, and I don't know if I
10 misspoke or the transcript is
11 mistranscribed, but what I said before
12 is, what I meant to say is, he answered
13 what he thinks you asked, but I'm not
14 sure what he answered is what you asked.

15 MR. KASS: Okay.

16 BY MR. KASS:

17 Q. Okay. Now, I'm going to ask you
18 to turn to Exhibit 33, and that's GAVIN_0344.
19 And I'm also going to ask you to pull up a
20 second e-mail, and I will tell you which one
21 that is in a second. And that's going to be
22 Exhibit 37, and that ends -- it's a GAVIN one,
23 and it ends in 0869.

24 MR. FREEDMAN: You cut out. Zero
25 what?

1 MR. KASS: 869.

2 MR. FREEDMAN: All right. Thank
3 you.

4 Q. Do you recall being shown these
5 e-mails yesterday?

6 A. Yes.

7 Q. Do you recall being asked a series
8 of questions about these e-mails?

9 A. Vaguely, yes.

10 Q. Do you recall a question on
11 Exhibit 37 about over 100 million?

12 So that's Exhibit 37, first line
13 from the top.

14 A. I don't recall what the question
15 was.

16 Q. But do you remember a discussion
17 about 100 million and you weren't really sure
18 what that was?

19 A. Yes, 100 million --

20 MR. FREEDMAN: Objection.

21 A. -- somethings.

22 Q. Exactly.

23 A. Yes, I do recall.

24 Q. Do you recall being asked a series
25 of questions about Dr. Wright's net worth based

1 on Exhibit 33 and 37?

2 A. Vaguely, yes.

3 Q. Now, do you have any personal
4 knowledge as to Dr. Craig Wright's wealth?

5 MR. FREEDMAN: Objection.

6 A. No. The only personal knowledge I
7 have is how he dresses, how he presents
8 himself, the fact that, you know -- well,
9 actually, I have no personal knowledge about
10 his travels, but he said that he travels and
11 lives a nice life-style.

12 Q. Thank you. Let's break that down.
13 So let's first talk about things that you've
14 observed with your senses with regards to Craig
15 Wright's wealth, and then we'll deal with the
16 other half afterwards.

17 So what have you observed with
18 regards to Craig Wright's wealth with your own
19 senses?

20 A. When I met him in London, he
21 seemed well-dressed. He seemed well-spoken.
22 He seemed like a person who was not poor, was
23 not lower class.

24 Q. Okay. Now, is the way someone
25 dressed always an indicator -- or is it a

1 good -- do you believe it's a good indicator of
2 someone's net worth?

3 A. No.

4 Q. Is it possible to be --

5 MR. FREEDMAN: Objection.

6 Q. -- well-dressed but heavily in
7 debt?

8 A. Yes. Absolutely.

9 Q. And does one have to be --

10 MR. FREEDMAN: Objection.

11 Q. Does one have to have a fortune in
12 Bitcoin to be well-dressed?

13 A. No.

14 Q. And the fact that somebody is
15 well-dressed, does that mean they have a
16 fortune in Bitcoin?

17 A. No, certainly not.

18 Q. Does that mean they have a lot of
19 money?

20 A. No, not necessarily.

21 Q. All right. So that's how -- have
22 we covered everything that you've observed with
23 your own senses?

24 A. Yes.

25 Q. Now --

1 MR. FREEDMAN: Objection.

2 Q. So is it fair to say that
3 everything else that you know about
4 Dr. Wright's net worth is you heard from
5 somebody else or somebody?

6 MR. FREEDMAN: Objection.

7 A. Yes. That's fair to say.

8 Q. So now going back to these two
9 e-mails which are Exhibit 33 and 37, Exhibit 37
10 says "That is individuals with over 100 million
11 net wealth," correct?

12 Do you see that?

13 A. Yes.

14 Q. All right. Do you know if
15 that's -- do you know if Dr. Wright has over
16 100 million net wealth?

17 A. My assumption, reading this
18 e-mail, is that he has more than 100 million
19 Australian dollars, because this was in the
20 context of a discussion about Australian tax
21 office stuff.

22 Q. Do you have any personal knowledge
23 as to whether that's actually true?

24 MR. FREEDMAN: Objection.

25 A. No.

1 Q. So is this just based on an e-mail
2 that a person had sent by Dr. Wright?

3 MR. FREEDMAN: Sorry. There was
4 an objection between the "Do you have
5 any personal knowledge as to whether
6 that's actually true" and "No."

7 Q. So is this just based on an e-mail
8 that appears to have come from Dr. Craig
9 Wright's e-mail?

10 A. Yes.

11 Q. Now, assuming that this is
12 accurate, because we don't know if it is,
13 correct?

14 So, again, assuming that this is
15 accurate, do you know the source of those
16 funds? Of the net worth.

17 A. No.

18 Q. Could Dr. Wright have won the
19 lottery and got fabulously wealthy?

20 A. It's possible, yes.

21 Q. Could he have inherited a lot of
22 wealth?

23 A. It's possible, yes. I have no
24 knowledge.

25 MR. FREEDMAN: Objection.

1 Q. Could he have purchased a lot of
2 Bitcoins when they were really cheap in the
3 early days?

4 MR. FREEDMAN: Objection.

5 A. Yes, that's possible, too.

6 Q. And do you have any knowledge
7 whether Dave Kleiman was involved in generating
8 any of this wealth?

9 A. No.

10 MR. FREEDMAN: Objection.

11 Q. If this wealth exists, do you know
12 if it's held in Dr. Wright's name?

13 A. No.

14 MR. FREEDMAN: Objection.

15 Q. Do you know if this wealth is
16 locked up in a trust somewhere?

17 A. No.

18 Q. Do you know if Dr. Wright has
19 access to this wealth?

20 A. No.

21 MR. KASS: Let's take a
22 five-minute break. I'm actually getting
23 close to -- I'm not entirely done, but
24 I'm getting close. I just want to go
25 over my notes and see if I have anything

1 else.

2 VIDEO TECHNICIAN: The time is
3 12:24 p.m. We are off the record.

4 (Proceedings recessed at
5 12:24 p.m. and reconvened at 12:33
6 p.m.)

7 VIDEO TECHNICIAN: The time is
8 12:33 p.m. We are back on the record.

9 BY MR. KASS:

10 Q. All right. I'm going to ask you
11 to turn now to what has previously been marked
12 as Exhibit 35, and that's GAVIN_0274.

13 And then I'm going to also ask you
14 to turn to exhibit that has been previously
15 marked as 34, and that ends in -- it's GAVIN
16 and it's 0732.

17 Do you recall being asked
18 questions about these --

19 MR. FREEDMAN: Sorry, Zalman. I
20 can't seem to find the first one. I
21 have GAVIN_0372. What was the other
22 one?

23 MR. KASS: It's 1274.

24 MR. FREEDMAN: Got it. Thank you.

25 Q. Do you recall being shown these

1 two exhibits yesterday?

2 A. Yes.

3 Q. And do you recall being asked
4 questions about these exhibits?

5 A. Vaguely, yes.

6 Q. Okay. Now, on the exhibit that's
7 labeled 35, do you see the second line. It
8 says, "I have sufficient funds that they can
9 force me to sell"?

10 A. Yes.

11 Q. And then do you see in the
12 paragraph under, it says, "It would mean
13 dumping 400 million in coin to pay"?

14 A. Yes.

15 Q. Again, do you have any personal
16 knowledge as to whether this is true?

17 A. No.

18 Q. Do you know --

19 MR. FREEDMAN: Objection.

20 Q. -- what "coin" refers to in this
21 e-mail?

22 A. I assumed it meant Bitcoin.

23 Q. Right. Could it have meant
24 another type of coin?

25 MR. FREEDMAN: Objection.

1 A. It could be a colloquial phrase for
2 money in general.

3 Q. Could it be that Dr. Wright is a
4 coin collector?

5 MR. FREEDMAN: Objection.

6 A. It seems unlikely anybody --

7 MR. FREEDMAN: I'm sorry. I'm
8 just seeing objection. There was an
9 objection, or at least there was
10 supposed to be an objection, between
11 "Could it have meant to be another
12 coin?" And you have the last objection.

13 Q. Mr. Andresen, I'm sorry, you got
14 cut off in the middle of your answer. What was
15 your answer?

16 A. My answer was 400 million in
17 collectable coins seems unlikely. That would
18 be a large pile of collectable coins. So I
19 assume he's not referring to some physical
20 coin. But I suppose it could be possible.
21 Although, in the context of this e-mail where
22 he talks about signing, it seems unlikely to
23 me.

24 Q. Unlikely. But you don't know with
25 any certainty what he's really referring to?

1 A. I don't know with absolute --

2 MR. FREEDMAN: Objection.

3 A. I don't know with absolute
4 certainty what he's referring to.

5 Q. And you don't know what he's
6 saying is in fact accurate?

7 A. Correct. I don't even know --

8 MR. FREEDMAN: Objection.

9 A. -- if craig@rcjbr.org is the Craig
10 Wright that I met in London.

11 Q. Okay. And let's go to Exhibit 35,
12 which -- 34. I apologize. 34.

13 Is it your answers apply to this
14 e-mail also, that again you have no personal
15 knowledge as to the contents of this e-mail?

16 MR. FREEDMAN: Sorry, Zalman.

17 This is Bates 372?

18 MR. KASS: Yes. No, no. This is
19 732.

20 MR. FREEDMAN: Oh. Hold on. Can
21 you give me one second to get the
22 document? I apologize.

23 MR. KASS: Yes. And I'm going to
24 actually rephrase that question.

25 MR. FREEDMAN: I got it.

1 BY MR. KASS:

2 Q. Okay. So let's look at the one
3 line that says -- second from the bottom
4 paragraph, "I have sufficient funds that they
5 can force me to sell" at the bottom.

6 A. I see that.

7 Q. Do you know if that's true?

8 A. No. I have no independent
9 knowledge that that's true.

10 Q. Sure. And do you see a reference
11 on the third paragraph from the top relating to
12 "They is part" -- stating, "They is part a few
13 people (not all) in the tax office - years of
14 hate."

15 Do you know anything about that?

16 A. I don't have any --

17 MR. FREEDMAN: Objection.

18 A. No. I have no independent
19 knowledge about what happened between Craig
20 Wright and a tax office.

21 Q. So would it be fair to say that,
22 at most, you're reading an e-mail that appears
23 to have been sent, or may have been sent, from
24 Dr. Wright's e-mail address and just
25 interpreting what it says based on your -- on

1 your belief?

2 A. Sure. Yes.

3 Q. Okay. Do you recall testifying
4 yesterday that you believe Dr. Wright lied to
5 you?

6 A. Yes.

7 Q. What do you believe the lie was?

8 A. I believe he deceived me, which
9 deception I believe is a form of lying.

10 Q. Okay.

11 A. He deceived me about the proof
12 that he would provide to the world that he had
13 a private key to one of the early Bitcoin
14 blocks.

15 Q. Now, did he say one thing to you
16 and then do something different? That he was
17 going to do this, and then he didn't do it?

18 A. I don't think he ever explicitly
19 said what he was going to do.

20 Q. Okay. So is it fair to say that
21 you maybe feel misled about what he did?

22 A. I definitely feel misled about
23 what he did.

24 Q. Disappointed?

25 A. Disappointed, yes.

1 Q. But he didn't say a direct
2 untruth?

3 A. Yes.

4 MR. FREEDMAN: Objection.

5 Q. Are you familiar with SegWit?

6 A. Yes.

7 Q. What is SegWit?

8 A. SegWit is a technical change to
9 Bitcoin that I could go into detail about, but
10 I'm not sure you want me to.

11 Q. High -- hmm. Let me ask -- okay,
12 let's keep it like that, high level, and we'll
13 see how deep I want to dig.

14 A. Okay.

15 Q. Did SegWit change the way
16 transactions are stored on the blockchain?

17 A. SegWit introduced a new way of
18 storing transactions on the blockchain. The
19 old way of storing transactions on the
20 blockchain are still valid with the SegWit
21 change.

22 Q. And if somebody has an old version
23 of the Bitcoin software pre-SegWit, is it able
24 to interact with the newer transactions after
25 SegWit?

1 A. No. If you have an old version of
2 the software, it won't understand the new form
3 of transactions.

4 Q. And is that a widely-accepted
5 belief in the Bitcoin community?

6 A. Yes, I believe so.
7 I should amend my previous
8 statement --

9 Q. Okay.

10 A. -- because the way SegWit is
11 implemented, I believe old versions of the
12 software will falsely accept SegWit
13 transactions. It will not properly validate
14 them.

15 Q. Okay. So -- what do you mean by
16 that? I don't want to speak for you.

17 A. So the job of the Bitcoin software
18 is to make sure that only valid transactions
19 are accepted --

20 Q. Mm-hmm.

21 A. -- and what's called confirmed.

22 Q. Mm-hmm.

23 A. And so SegWit introduced a new
24 kind of transaction to maintain compatibility.

25 Old versions of the software

1 accept all SegWit transactions as valid.
2 Whereas, new versions of the software do you
3 can think of it as deeper checks to make sure
4 that they actually are valid. And the
5 assumption is the miners who do the ultimate
6 validation all run the fully-validating
7 SegWit-compatible latest version of the Bitcoin
8 software.

9 Q. So is it fair to say that an older
10 version of the Bitcoin software can't validate
11 the newer SegWit transactions?

12 A. Yes.

13 Q. So would it also be fair to say
14 that the actual miner who is going to validate
15 this transaction, right, who by chance happened
16 to get the correct hashing and non- -- do the
17 correct --

18 A. A miner who solves the block?

19 Q. Thank you. The miner who solves
20 the block cannot be a miner running the old
21 software?

22 A. They could get lucky.

23 Q. Okay.

24 A. So, I mean, they might have some
25 SegWit transactions that they accept that turn

1 out to be valid. But if they were to accept --
2 if they were to create a block containing an
3 invalid SegWit transaction, according to the
4 new rules, then the other miners would reject
5 their block. And so it would not be accepted.
6 They would lose money.

7 Q. Is it fair to say that it's not
8 fully compatible --

9 A. Yes.

10 Q. -- the two versions?

11 A. Definitely fair to say they're not
12 fully compatible.

13 Q. And what's your basis for this
14 knowledge?

15 A. I reviewed the SegWit code
16 changes, or many of the SegWit code changes.

17 Q. And is one reason that the older
18 software can't recognize the newer transactions
19 is because the way the transaction is
20 structured is kind of mixed about?

21 A. Yes.

22 Q. Okay. Got it.

23 Prior to yesterday's deposition,
24 did you speak with counsel representing Ira
25 Kleiman or Dave Kleiman? Let's do Dave

1 Kleiman, or the Estate of Dave Kleiman.

2 A. Yes. They gave me a phone call
3 informing me that this deposition would happen.

4 Q. And do you recall when that phone
5 call was?

6 A. I don't recall.

7 Q. Prior to that phone call, did you
8 have any communication with them?

9 A. Yes. We had a phone call
10 discussing the subpoena, and going through the
11 subpoena.

12 Q. Okay. Now, did you have any phone
13 calls, other than the two phone calls that you
14 just mentioned?

15 A. I don't believe so, no.

16 Q. Did you have any e-mail
17 communications with counsel for doctor -- I
18 mean, for the Plaintiffs?

19 A. Probably. Yes.

20 MR. KASS: Vel, I'm going to
21 request those.

22 Q. Let's start with the first phone
23 call regarding the subpoena. What was
24 discussed during that phone call?

25 A. The scope of the subpoena and

1 mechanics of how I would respond to the
2 subpoena.

3 Q. Did you discuss anything
4 substantively about the Plaintiffs' claims in
5 this case?

6 A. No, I don't believe so.

7 Q. And do you recall which attorneys
8 were on that phone call, their names?

9 A. No, I don't.

10 Q. Now, in the second phone call, was
11 that more recent?

12 A. Yes, that was more recent.

13 Q. Was it within the past few months?

14 A. Yes.

15 Q. And what was the substance of the
16 second phone call?

17 A. It was logistics of this
18 deposition.

19 Q. Did they ask you any substantive
20 questions?

21 A. No, not that I recall.

22 Q. Did they ask you anything about
23 your relationship with Dr. Craig Wright?

24 A. I don't believe so, no.

25 Q. Did they ask you anything about

1 the proof session that happened in London?

2 A. I don't think they asked me
3 anything about it. I think that they did say
4 that they would be asking questions about it.

5 Q. Okay. Did they say that they were
6 going to be asking questions about anything
7 else?

8 A. Not that I recall, no.

9 Q. And how long did that phone call
10 last for? Approximately.

11 A. Maybe ten minutes.

12 Q. And do you know the attorneys that
13 were on that phone call, their names?

14 A. No, I don't.

15 Q. Could one have been Velvel
16 Freedman?

17 A. Very possibly, yes.

18 MR. KASS: I'm going to mark the
19 next exhibit, although this is a little
20 risky, because starting a new sheet I
21 don't know if there is another sheet
22 around there. So I may be jumping.

23 COURT REPORTER: Let me tell you
24 that.

25 (Discussion off the record.)

1 (Document marked for
2 identification as Andresen Exhibit 74)

3 MR. KASS: I'm going to introduce
4 Exhibit 74, and this is GAVIN_0023.

5 MR. FREEDMAN: Is this one of the
6 ones you sent me?

7 MR. KASS: Yes, it is. I sent it
8 in an e-mail.

9 MR. FREEDMAN: Got it. Thank you.

10 BY MR. KASS:

11 Q. Do you recognize this document?

12 A. Yes.

13 Q. What is it?

14 A. It's an e-mail from Stefan
15 Matthews to me.

16 Q. And what do you say in the
17 substance of that e-mail?

18 A. I say that I signed an NDA
19 agreement and gave him a Hushmail address to
20 communicate with me.

21 MR. KASS: Now, I'm going to
22 introduce as Exhibit 75, and it's Bates
23 number 0024.

24 (Document marked for
25 identification as Andresen Exhibit 75)

1 Q. And do you recognize this
2 document? If it helps, it's sequentially
3 numbered.

4 A. Sure. Yes. It's probably the
5 signed NDA agreement that was the attachment
6 from the e-mail.

7 Q. Correct. And if you go to Page 3,
8 do you see where it says "Signed by Gavin
9 Andresen."

10 A. Yes.

11 Q. Is that in fact your signature?

12 A. That is my signature.

13 Q. And do you believe that you signed
14 it?

15 A. I do believe I signed it, yes.

16 Q. Now, do you know if this
17 non-disclosure agreement was ever revoked?

18 A. I don't know.

19 Q. And prior to sitting -- now, let's
20 just look -- I just want to go to the first
21 page. Under 1.1, it says, "We EITC."

22 And then also if you go to the
23 last page, Page 3, and then it says -- it's
24 blank over here, but it seems like it should be
25 signed by "(a director) for and on behalf of

1 EITC Holding Limited"?

2 A. Yes.

3 Q. So is it fair to say that this
4 agreement is entered into between you and EITC
5 Holding Limited?

6 A. Assuming that they signed --

7 Q. Signed it, yeah.

8 A. -- their copy, sure.

9 Q. That's who it was intended to be
10 entered into with?

11 A. Yes.

12 Q. Prior to being deposed, did you
13 reach out to EITC to see if they had any
14 objections to you providing testimony?

15 A. No, I did not.

16 Q. And let's just look at Paragraph
17 1.2. And it seemed like it defines
18 "Confidential Information."

19 Do you see that?

20 A. Yes.

21 Q. And it says [As Read]:
22 Confidential Information means all confidential
23 or proprietary information (however recorded or
24 preserved) that is associated or made available
25 before or after the date of this agreement (in

1 any form or medium), directly or indirectly, by
2 the Provider to the recipient. For the
3 avoidance of doubt, the fact of any
4 confirmation or admission concerning the
5 identity of the creator of blockchain and
6 Bitcoin is Confidential information.

7 Do you see where it says that
8 there?

9 A. I see where it says that, yes.

10 MR. KASS: Okay. I think I'm
11 done, Vel. It's all yours.

12 MR. FREEDMAN: Okay. Can we take
13 a five-minute break and then we'll get
14 back on the record?

15 MR. KASS: Yes.

16 VIDEO TECHNICIAN: The time is
17 12:54 p.m. And I'm going to close out
18 media unit number one of today's
19 deposition. We are off the record.

20 (Proceedings recessed at
21 12:54 p.m., and reconvened at 1:03 p.m.)

22 VIDEO TECHNICIAN: The time now is
23 1:03 p.m. We're coming back on the
24 record. Now beginning media unit number
25 two in today's deposition with Gavin

1 Andresen. We're on the record.

2 MR. KASS: And just before we
3 start, I'm going to designate the entire
4 deposition transcript confidential,
5 especially in light of the nondisclosure
6 agreement. And I believe the witness
7 also may have some additional portions
8 that the witness wants to designate as
9 confidential. I'm not sure if the
10 witness wants to do it now or just send
11 an e-mail to counsel. How would you
12 like to proceed?

13 THE WITNESS: I will send an
14 e-mail to counsel. But I would request
15 that the majority of this remain
16 confidential.

17 MR. KASS: Okay.

18 EXAMINATION

19 BY MR. FREEDMAN:

20 Q. All right. Mr. Andresen, we met
21 yesterday, so I'm not able to be there in
22 person today, but thank you for coming back.

23 A. You're welcome.

24 Q. You mentioned yesterday that you
25 might have Bitcoin from your short mining

1 activity back in 2010. Do you recall that?

2 A. Yes, I do.

3 Q. Did you check last night whether
4 or not you had any?

5 A. No, I did not.

6 Q. To the best of your recollection
7 right now, do any of the coinbases address --
8 the coinbase addresses of those blocks have all
9 50 coins remaining in them, or have you
10 certainly spent at least some out of all of the
11 coinbase addresses?

12 A. I've certainly moved them to other
13 wallets.

14 Q. So would it be fair to say at the
15 current moment, you do not have any -- you do
16 not have any Bitcoin that reside in the
17 coinbase address they were originally mined in
18 back in 2010?

19 A. Correct.

20 Q. Okay. Thank you.

21 Where does Jon Matonis live?

22 A. I don't know where Jon Matonis
23 lives.

24 Q. Do you know his e-mail address?

25 A. Not off the top of my head, but

1 it's in my contact list.

2 Q. Could you look that up for me if
3 we sent you an e-mail after the deposition?

4 A. Yes.

5 Q. Do you know his phone number?

6 A. I may have a phone number in my
7 contacts for him.

8 Q. Would you mind looking that up for
9 me also after the deposition?

10 A. Sure. I could do that.

11 Q. What about his business address?
12 Do you happen to have that? Or a home address?

13 A. I don't think I have any physical
14 addresses for him, no.

15 Q. Would you expect that Mr. Matonis
16 has knowledge akin to yours about the proof
17 session and interactions directly with Craig
18 Wright?

19 MR. KASS: Objection to form.

20 A. I believe Jon told me that he also
21 witnessed some sort of proof, but I have no
22 details of whether it was the same sort of
23 proof session that I had with Dr. Wright or
24 something completely different.

25 I haven't asked him, and he hasn't

1 told me.

2 Q. Mr. Andresen, have you ever heard
3 the name Calvin Ayre [Ire], A-y-r-e?

4 A. Yes, I've heard --

5 Q. Or Ayre [Air].

6 A. Yes, I've heard the name Calvin
7 Ayre.

8 Q. In what context?

9 A. He's a personality in the Bitcoin
10 world.

11 Q. Was there any connection -- strike
12 that.

13 To your knowledge, was there any
14 connection between Calvin Ayre and Craig
15 Wright?

16 A. Not to my knowledge.

17 Q. Have you ever heard the name
18 nChain?

19 A. nChain. Maybe. There are many
20 whatever chains in the Bitcoin blockchain
21 world.

22 Q. Would it surprise you -- strike
23 that.

24 Do you recall the name EITC
25 Holdings Limited?

1 A. EITC Holdings Limited. Yes, I
2 remember that because I was told EITC stands
3 for East Indian Trading Company.

4 Q. And in what context did you hear
5 that name?

6 A. When I flew to London, one of the
7 people I met with was one of the EITC people,
8 and the non-disclosure agreement that I signed
9 was with EITC Holdings.

10 Q. So this is the company we
11 discussed yesterday being the money men?

12 MR. KASS: Object to form.

13 A. Yes. One of the -- one of the --
14 yes. EITC Holdings was -- yes, the business
15 that I was told was getting involved with Craig
16 Wright in some form.

17 Q. I believe you said yesterday they
18 were a type of venture capital firm; is that
19 correct?

20 A. That was my understanding, yes. I
21 might have done some online research --

22 MR. KASS: And object to form.

23 A. -- looking at what they did. But,
24 yes, some sort of investment, venture
25 capital --

1 Q. And the reason that you -- sorry,
2 go ahead.

3 A. Some sort of investment or venture
4 capital firm.

5 Q. And the reason we use the term
6 money men is because it was your understanding
7 that they were providing the funding associated
8 with Craig's coming-out as Satoshi Nakamoto?

9 MR. KASS: Object to form.

10 A. Yes. That was my understanding.

11 Q. Mr. Andresen, would it surprise
12 you to hear that Calvin Ayre is behind the
13 entire coming-out as Satoshi Nakamoto is Craig
14 Wright?

15 MR. KASS: Object to form.

16 A. Uh, would it surprise me. Um.
17 Uh. I mean, this whole affair has been very
18 weird. So, no, I don't think it would surprise
19 me.

20 Q. Was there -- thinking back to your
21 time in London, was there any reference to a
22 mysterious backer or a business mogul, or some
23 other shadowy figure, that might be consistent
24 with a reference to Calvin Ayre?

25 MR. KASS: Object to form.

1 A. No, not that I recall.

2 Q. Mr. Andresen, you never spoke
3 directly -- strike that.

4 Did you ever speak to Satoshi
5 Nakamoto via telephone?

6 A. No.

7 Q. Did you ever speak to him in any
8 other way besides written correspondence via
9 your e-mails and private Bitcoin forum
10 messages?

11 A. No.

12 Q. So is it possible that the person
13 you were conversing with in 2010 and 2011 was
14 actually more than one person?

15 A. Yes, that's possible.

16 Q. You reviewed many of the e-mails
17 that appear to have come from Craig Wright's
18 addresses during this deposition; would that be
19 a fair characterization?

20 A. Yes.

21 Q. And you've spoken to Craig --
22 strike that.

23 Do you have any indication that it
24 wasn't Craig sending you those e-mails?

25 A. No, I have no indication that it

1 was not Craig -- the Craig Wright I met in
2 London sending me those e-mails.

3 Q. Did Craig ever tell you that you
4 should not trust e-mails that appear to come
5 from him?

6 MR. KASS: Object to form.

7 A. I don't think so.

8 Q. Do you have any reason to think it
9 was not Craig that was the sender of those
10 e-mails?

11 A. No, I have no reason to think
12 that.

13 Q. Mr. Andresen, I'm going to read
14 you an e-mail, the first sentence of an e-mail,
15 that Craig Wright sent to Louis Kleiman, which
16 was Dave Kleiman's father. Is that all right?

17 MR. KASS: I'll object. But, yes
18 to the extent you're -- well, I'm just
19 going to leave it to object to the
20 document. I'm not going to do a speech.
21 If you want, I can flesh out my
22 argument.

23 A. I'm listening.

24 Q. It's dated February 11, 2014, and
25 it begins, "Hello Louis, Your son Dave and I

1 are two of the three key people behind
2 Bitcoin..."

3 Is that very similar to what you
4 recall as Craig's statement to you that the
5 person of Satoshi was actually being three
6 people, Dave Kleiman, Craig Wright, and a
7 mysterious person you never asked about?

8 MR. KASS: Object to form.

9 A. Yes.

10 Q. And you testified yesterday that
11 you recall Craig Wright getting emotional and
12 telling you about Dave being one of the three
13 people behind the Satoshi persona.

14 Do you recall that?

15 A. I think I recall testifying to
16 that, yes.

17 MR. KASS: Object to form.

18 Q. And do you recall testifying that
19 it was particularly prominent in your mind
20 because it's unusual; you don't generally see a
21 grown man almost crying?

22 MR. KASS: Object to form.

23 A. Yes, I recall that.

24 Q. So if your recollection is
25 accurate and Craig and Dave -- and Craig told

1 you that he and Dave were each one-third of
2 Satoshi Nakamoto, then wouldn't it be true that
3 Craig Wright worked with Dave Kleiman?

4 MR. KASS: Object to form.

5 A. Yes, if that -- if my recollection
6 is correct and if Craig Wright was telling the
7 truth, then yes.

8 Q. It would be accurate to describe
9 that relationship as working with each other?

10 MR. KASS: Object to form.

11 A. Sure.

12 Q. And can you turn to Exhibit 69 for
13 me, which is your blog log post from May 2,
14 2016?

15 A. Okay. Yes.

16 Q. And if you look at the
17 second-to-last paragraph from the bottom of the
18 first page, and that last sentence there, can
19 you read that last sentence that says "But"?

20 A. "But I'm going to respect
21 Dr. Wright's privacy, and let him decide how
22 much of that story he shares with the world."

23 Q. You were expressing intent not to
24 reveal much of what Dr. Wright told you during
25 that meeting; is that accurate?

1 MR. KASS: Object to form.

2 A. Yes.

3 Q. It was on Dr. Wright to reveal the
4 intimate details of his being Satoshi; is that
5 a fair characterization of your attitude?

6 MR. KASS: Object to form.

7 A. Can you ask that again?

8 Q. Is it a fair characterization of
9 your attitude toward disclosing what you were
10 told -- strike that.

11 Would it be fair to say that you
12 were approaching -- no, strike that, too.

13 Would it be fair to say that you
14 were not going to give many details out about
15 what Craig told you because you believe that
16 was for Craig to share?

17 MR. KASS: Objection.

18 A. Yes.

19 Q. And can you turn back with me to
20 exhibit I believe it's 73. It's Bates
21 GAVIN_1759.

22 A. Okay.

23 Q. And this is the e-mail
24 correspondence between you and Ira Kleiman; is
25 that accurate?

1 A. Yes.

2 Q. Were you sure this was Ira Kleiman
3 that you were e-mailing with?

4 A. No. Well --

5 Q. Is it fair to say that you would
6 have approached any conversation with the
7 recipient of this e-mail with any caution?

8 MR. KASS: Object to form.

9 Q. Let me rephrase that for you.
10 Is it fair to say that you would
11 be cautious in what you would tell the other
12 person at the end of this e-mail because you
13 weren't really sure this was Dave Kleiman's
14 brother?

15 MR. KASS: Object to form.

16 A. Yes, that's fair. Well, and I'm
17 not sure --

18 Q. If you go down --

19 A. I'm not sure the fact that it was
20 Dave Kleiman's brother has any -- I'm generally
21 cautious about not -- not taking at face value
22 if I receive an e-mail from somebody I haven't
23 met personally and don't have a relationship
24 with, you know, I'm going to be cautious,
25 because e-mails can easily be faked.

1 Q. Right. So you didn't know who was
2 on the other end of this e-mail chain.

3 A. Correct. Everything --

4 Q. And in -- go ahead.

5 A. I was just going to say everything
6 I know is in this e-mail.

7 Q. Right. And the sender of this
8 e-mail asks you for information about Craig and
9 Dave Kleiman; is that accurate?

10 A. Yes.

11 Q. And you respond that Craig said
12 that he worked with David.

13 A. Yes.

14 Q. Beyond that, I don't know much.
15 Is that fair?

16 A. Yes, that's fair.

17 Q. Now, isn't it true that if Craig
18 told you he and Dave were one-third each of
19 Satoshi, that they worked -- that Craig worked
20 with David?

21 MR. KASS: Object to form.

22 A. Yes.

23 Q. So your e-mail would be a true
24 characterization of your conversation with
25 Craig Wright even if -- strike that.

1 Your e-mail would be a true
2 characterization of your conversation with
3 Craig Wright, as you recall it, as he said he
4 and Dave Kleiman were each -- as he said it,
5 collectively two-thirds of the Satoshi persona;
6 is that right?

7 MR. KASS: Object to form.

8 A. Can you repeat the question?

9 Q. Sure. Isn't it true that this
10 e-mail is an accurate way to cautiously give
11 someone information that would reflect the
12 conversation you had with Craig Wright that he
13 and Dave Kleiman were two of the three people
14 behind Satoshi Nakamoto?

15 MR. KASS: Object to form.

16 A. I think the only thing I was --
17 again, I have to say my recollection of who
18 told me what when is fuzzy. So --

19 Q. But you recall --

20 A. I do recall Craig saying that he
21 and David worked together, and I do recall him
22 getting emotional when recalling Dave.

23 Q. In the context --

24 MR. KASS: I think he's still --

25 Vel, the witness is in the middle of

1 answering still.

2 A. So I'm not -- at this point, I'm
3 not sure my memory is any more clear than being
4 able to say I'm reasonably certain that they
5 worked together. Beyond that -- for example,
6 the one-third of Satoshi Nakamoto phrase, I
7 can't say for certain that Craig Wright ever
8 said that to me.

9 Q. But you have a reasonably --
10 you're reasonably -- sorry, let me strike that.

11 Is it more likely than not that he
12 told you that?

13 MR. KASS: Object to form.

14 A. I don't know.

15 Q. Is it less likely than not?

16 MR. KASS: Object to form.

17 A. Again, I don't know. You're
18 asking me to judge my own memory, and I'm --
19 I'm a skeptic. I've seen the research on how
20 fallible our memories are. So I'm not a --

21 Q. Let's do this --

22 A. -- good judge.

23 Q. Sorry, go ahead finish.

24 A. I'm just not a good judge of my
25 own certainty of my own memory.

1 Q. I understand that you can't swear
2 to that this happened exactly as you recall it.

3 Let me ask you the question this
4 way: Do you have a memory of Craig Wright
5 telling you that he and Dave Kleiman were each
6 one-third Satoshi Nakamoto?

7 MR. KASS: Object to form.

8 A. No, I don't --

9 Q. I understand you can't -- I
10 understand you can't swear that that's exactly
11 what happened. But do you recall that
12 happening?

13 MR. KASS: Same objection.

14 A. No, I don't have a clear memory of
15 that happening.

16 Q. So yesterday you testified that
17 you recall this occurring. Where did that come
18 from?

19 MR. KASS: Object to form.

20 A. Uh, uh, uh...

21 Q. In fact, yesterday you said it was
22 particularly prominent in your mind because you
23 remember him getting emotional about it. It's
24 not every day that you see a grown man crying.

25 Did you make up the testimony

1 yesterday that you recall Craig telling you
2 that?

3 MR. KASS: Wait. Vel, if you're
4 purporting to read from the
5 transcript --

6 MR. FREEDMAN: Zalman --

7 MR. KASS: -- we're going to have
8 the same issue.

9 MR. FREEDMAN: Zalman, I'm going
10 to -- Zalman, you have to keep your
11 objection to form just like you asked me
12 to.

13 MR. KASS: Yes, and like you
14 didn't do it.

15 BY MR. FREEDMAN:

16 Q. Mr. Andresen, did you make up that
17 memory in your mind, or did you have a memory
18 you were thinking about when you testified
19 about that yesterday?

20 MR. KASS: Object to form.

21 A. It's very possible that that
22 memory is spurious, made up. It's an
23 amalgamation of things that I've heard. That's
24 very possible. I don't have a --

25 Q. Did you have --

1 A. I have --

2 Q. But you do have a memory?

3 A. I have --

4 MR. KASS: Object to form.

5 A. I have two memories that are
6 fuzzy. Well, I have one memory that is clear,
7 and that's of Craig Wright getting emotional
8 when talking about Dave Kleiman. That's a
9 fairly clear memory.

10 I have a less clear memory about
11 Craig saying that there were three main people
12 involved. I don't have any clear memory of the
13 phrase one-third coming up. But three
14 people -- I do have a vague memory of him
15 talking about three people, and that the third
16 mysterious person helped out with the
17 cryptography. That's a clear-ish memory.

18 Beyond that, everything is fuzz.

19 Q. Let's break that down a bit. You
20 have a clear memory of Craig telling you there
21 was a third person who helped out with
22 cryptography behind the Satoshi Nakamoto
23 persona; is that fair?

24 MR. KASS: Object to form.

25 A. A fairly clear memory. Again,

1 it's four years ago, and my memory is
2 infamously bad.

3 Q. I understand. I just want to get
4 to where -- I just want to get to what you
5 remember. I understand you're disclaiming
6 necessarily the accuracy of your memory. But
7 let's just talk about what is in your memory.

8 In your memory it's fair to say
9 there is a particularly clear or fairly clear
10 memory of Craig Wright telling you that there
11 was a third person behind the Satoshi Nakamoto
12 persona that was mysterious or a mystery person
13 who helped out with the cryptography.

14 Is that a fair characterization --
15 MR. KASS: Object to form.

16 Q. -- of your memory?

17 A. I think that's what I just said,
18 yes.

19 Q. Okay. Now, necessarily that means
20 there were two other people; is that fair?

21 MR. KASS: Object to form.

22 A. Yes.

23 Q. And you have a fairly clear memory
24 that one of those three people was Craig Wright
25 and the other was Dave Kleiman?

1 MR. KASS: Object to form.

2 Q. Is that fair?

3 MR. KASS: Object to form.

4 A. Yes, I think that's fair.

5 Q. Okay. When you met with

6 Dr. Wright and in your correspondence with

7 Dr. Wright via e-mail -- let me strike that.

8 In all of your correspondence and
9 interactions with Dr. Wright, do you think it's
10 fair to say that he led you to believe that he
11 was wealthy?

12 MR. KASS: Object to form.

13 A. Yes, I'd say that's fair to say.

14 Q. And is it fair to say that during
15 those interactions he led you to believe that
16 he owned Satoshi's Bitcoin?

17 MR. KASS: Object to form.

18 A. Yes.

19 Q. And do you think it's fair to say
20 that during those interactions he led you to
21 believe that he had significant resources?

22 MR. KASS: Object to form.

23 A. Maybe. And the only reason I say
24 maybe is because he was working with EITC, or
25 appeared to be working with EITC. And so if he

1 had infinite -- near infinite resources or, you
2 know, lots and lots of resources, then it's not
3 clear why he was working with the so-called
4 money men.

5 Q. Right.

6 MR. FREEDMAN: No further
7 questions.

8 MR. KASS: All right. So, Vel, I
9 have probably five, maybe ten, minutes
10 of questioning.

11 MR. FREEDMAN: All right. I just
12 want to point out that I was under the
13 half-hour that I said I reserved.

14 MR. KASS: Yeah. That is
15 impressive. Well, what if we deduct the
16 time you needed to get your things set
17 up. Anyways...

18 EXAMINATION

19 BY MR. KASS:

20 Q. Do you recall being asked
21 questions about Calvin Ayre?

22 A. Just now?

23 Q. Yes.

24 A. Yes.

25 Q. And do you recall being asked

1 whether you would be surprised if he was
2 involved in this reveal story in some manner?

3 A. Yes.

4 Q. And do you recall testifying that
5 you wouldn't be surprised?

6 A. Not particularly. It would be
7 interesting.

8 Q. Mm-hmm.

9 A. Unexpected.

10 Q. Mm-hmm.

11 A. I'm not sure I would go as far as
12 to say surprising.

13 Q. Okay. And do you recall stating
14 something that this whole thing is weird, to
15 that extent?

16 A. This whole thing is definitely
17 weird, yes.

18 Q. So would you be surprised if, I
19 don't know, maybe the government is somehow
20 involved in all of this?

21 A. That would surprise me.

22 Q. Okay. Well, let me ask you this:
23 Do you have any reason to believe that Calvin
24 Ayre actually was behind this whole reveal?

25 A. No.

1 Q. All right. So it's just like it
2 could be, and it takes a lot to surprise you.

3 A. Yes.

4 Q. And do you recall whether
5 throughout all of the exhibits you were shown
6 today any of them were from Calvin Ayre?

7 A. I don't believe any of them were.

8 Q. And also all the exhibits you were
9 shown yesterday; is that accurate?

10 A. Correct. None of them I don't
11 think mentioned Calvin Ayre.

12 Q. Did you ever meet Calvin Ayre?

13 A. I never heard of Calvin Ayre until
14 a couple years ago, as far as I know.

15 Q. And by "a couple of years ago," is
16 that after you had a proof session in London
17 with Dr. Wright?

18 A. I believe so. Yeah, I don't think
19 I had ever run across Calvin Ayre. And I've
20 never -- as far as I know, I have never met him
21 personally.

22 Q. Now -- this is where it gets
23 tough -- counsel for Plaintiffs read to you
24 what they stated was an e-mail between
25 Dr. Wright and Dave Kleiman's father.

1 Do you recall that?

2 A. Yes.

3 Q. Have you ever seen that e-mail?

4 A. No.

5 Q. And they asked if the contents of
6 that e-mail were similar to things Dave Wright
7 had told you -- that Craig Wright had told you?

8 A. Yes.

9 Q. In what way are they similar?

10 A. Just the fact that Craig told me
11 that he and Dave had worked together in the
12 past.

13 Q. Okay. So that's -- is that the
14 only connection between that e-mail and what
15 Craig had told you in the past?

16 A. Yes.

17 Q. And that's the similarity that you
18 were referring to?

19 A. Yes.

20 Q. Okay. Now, you mentioned
21 something about a memory amalgamation.

22 What do you believe that to be
23 when you state that?

24 A. Memories are fluid. We think we
25 remember things that we don't, and we're very

1 good at putting together multiple memories into
2 what we think is one memory. So that's what I
3 mean by that.

4 It's very easy to hear things from
5 four different places and then think it's all
6 one memory that you personally experienced when
7 you didn't actually personally experience it.

8 Q. And are you aware of any factors
9 that can make a memory amalgamation more likely
10 to occur?

11 A. Sure. If you're tired. If you're
12 stressed. If you're not paying attention,
13 because it's, you know, not something that you
14 think you might need to pay attention to. All
15 of those things I think contribute to having a
16 worse memory of an event.

17 Q. And could the frequency of talking
18 about a certain event or getting information
19 about it also impact a likelihood of a memory
20 amalgamation?

21 A. Sure. I think there are very good
22 studies about the events of our childhood that
23 are retold in stories. And if you look at how
24 accurate they actually turn out to be, they're
25 usually not very accurate at all because each

1 retelling changes the memory of it.

2 Q. And have you talked a few times
3 about this proof session to different people?

4 A. Yes, I have talked a few times
5 about the proof session.

6 Q. And you've received information
7 from different people also, correct?

8 A. Yes. There has been a lot of kind
9 of public articles and Reddit posts and
10 discussion and debate about it, yes.

11 Q. And have you been reading those
12 articles and posts?

13 A. I have read many of them, yes.

14 Q. And could it be that through all
15 of that, all that you read, sort of filtered
16 into your memory and made an amalgamation?

17 A. That's very possible. Yes.

18 Q. And you certainly can't state with
19 certainty that that did not happen?

20 A. I cannot.

21 Q. And one thing I want to clear up
22 is my understanding is you have two memories
23 with regards to when you were in London with
24 Dr. Wright. Two primary memories -- yeah, with
25 Dr. Wright, "I have two primary memories." Is

1 that accurate?

2 A. Well, I have --

3 Q. Let me -- I'll narrow it a little
4 bit because I'm sure you remember a lot of
5 stuff.

6 A. Yes.

7 Q. With regards to Dave Kleiman,
8 okay, or the identity of Satoshi, do you have
9 two primary memories?

10 A. That's probably accurate, yes.

11 Q. Okay. And what are those two
12 primary memories?

13 A. The two primary memories are I do
14 remember that Dr. Wright expressed emotion; he
15 expressed sadness when the subject of Dave
16 Kleiman came up.

17 Q. Okay.

18 A. I don't recall how the subject
19 came up.

20 Q. Okay.

21 A. And then I do -- I think I recall
22 Dr. Wright saying that there was a third person
23 involved somehow in the beginning that helped
24 him with some of the cryptography, because he
25 was not himself a cryptographer.

1 Q. Okay.

2 A. And I remember that discussion
3 because I had said in an interview previously
4 that Satoshi was not a cryptographer, and I
5 believe that came up with Craig and him saying
6 you're right about that. I was not a
7 cryptographer. There was somebody else that
8 helped me with the cryptography.

9 Q. And are those the two memories
10 that you remember?

11 A. Yes.

12 Q. Now, let me ask you, if throughout
13 the deposition -- you've testified numerous
14 hours yesterday, correct?

15 A. Yes.

16 Q. And a few hours today?

17 A. Yes.

18 Q. If throughout those tellings -- if
19 throughout that time period those memories have
20 changed over time, what would you chalk that up
21 to?

22 MR. FREEDMAN: Objection.

23 A. I would --

24 Q. What would that mean to you?

25 A. That would just reinforce my

1 belief --

2 MR. FREEDMAN: Objection.

3 A. -- that our memories are fallible,
4 and I am no more infallible than any other
5 human being. And that, in my opinion, the
6 written documents of the time are more accurate
7 than what I remember.

8 So anything that I wrote down at
9 the time, or near the time, is almost certainly
10 more accurate than what I remember.

11 Q. Okay. So, for example, if we go
12 to Exhibit 73 and there it says, is written, in
13 less than a month after you had that reveal
14 with Dr. Wright and you said, beyond that,
15 Dr. Wright works with David, I don't know much,
16 that would be more accurate than your current
17 memory?

18 A. Most likely, yes.

19 Q. And if you were to put a blog post
20 up a few weeks after the reveal where you said
21 Craig Wright is the person behind Satoshi, that
22 would also be more accurate?

23 A. Well --

24 Q. Other than you may have learned
25 things after.

1 A. Yeah, I've learned things after
2 that give me doubts.

3 Q. Right. But as far as the --

4 A. What I believed at the time --

5 Q. Exactly, yes. What you believed
6 back then.

7 A. -- that -- yes, that more
8 accurately reflects what I believed at the
9 time.

10 Q. Okay. And would you feel
11 comfortable telling the jury in this case that
12 Dr. Wright told you Dave was one-third Satoshi?

13 A. No.

14 MR. FREEDMAN: Objection to form.

15 MR. KASS: I'm done.

16 MR. FREEDMAN: I just have one
17 question.

18 MR. KASS: Okay.

19 EXAMINATION

20 BY MR. FREEDMAN:

21 Q. Mr. Andresen, would you feel
22 comfortable telling -- well, let me strike
23 that. Actually, I have one -- a couple more
24 than one question.

25 Do you believe that everything you

1 said today is your best attempt to tell the
2 truth?

3 A. Yes.

4 Q. And so your testimony to me
5 earlier that you have a reasonably clear memory
6 was your attempt to tell the truth?

7 A. Yes.

8 Q. And you just can't be sure of the
9 accuracy of that memory; is that right?

10 A. That's correct.

11 Q. So you would be comfortable, then,
12 would you not, with the jury hearing the entire
13 presentation of the story; that you have this
14 memory that you can't be sure is correct. Is
15 that fair?

16 A. Sure.

17 Q. And, Mr. Andresen, is there
18 anything inconsistent between the statement
19 Craig said that he worked with Dave, and Craig
20 and Dave each being one-third of the Satoshi
21 Nakamoto team?

22 A. No. Those would be consistent
23 statements.

24 MR. FREEDMAN: I have no further
25 questions.

1 MR. KASS: I have one, maybe two
2 follow-ups.

3 EXAMINATION

4 BY MR. KASS:

5 Q. So, Mr. Andresen, when you say
6 those statements aren't inconsistent, is that
7 consistent as we've been talking about it
8 earlier on today?

9 A. Yes, that's consistent in that
10 they don't contradict each other.

11 Q. Right. But it doesn't mean that
12 it was actually said.

13 A. Correct.

14 Q. Now, you were asked about this
15 memory which was stated reasonably clear --
16 that was that you had a reasonably clear
17 memory. Do you recall earlier stating it was a
18 fuzzy memory?

19 A. I don't recall, but it's very
20 possible that I contradicted myself.

21 Q. Is that because memory is --

22 A. That's because memory is fuzzy.

23 Q. Okay. Now, if you were the jury,
24 would you feel comfortable relying on that
25 fuzzy memory in determining the outcome of this

1 type of case?

2 MR. FREEDMAN: Objection.

3 A. If I was on a jury, no.

4 Q. Okay.

5 A. I would be skeptical of any memory
6 longer than events that happened a week ago,
7 frankly.

8 Q. And is this also in particular
9 knowing your own memory?

10 MR. FREEDMAN: Objection.

11 A. Yes. My wife can tell you all
12 about how poor my memory tends to be.

13 Q. Do you believe your memory is also
14 suggestible?

15 A. Yes, I believe everybody's memory
16 is suggestible.

17 MR. KASS: That's all I have.

18 MR. FREEDMAN: Just objection to
19 that last question. And I have no
20 further questions.

21 MR. KASS: All right. I think we
22 are done.

23 VIDEO TECHNICIAN: The time now is
24 1:41 p.m., and we're coming to the end
25 of media unit number two, and we have

1 reached the end of today's deposition
2 with Gavin Andresen. We are off the
3 record.

4 (Discussion off the record)

5 MR. FREEDMAN: Mr. Andresen, you
6 have a right to read your deposition
7 transcript and correct any errors you
8 think, if, you know, the court reporter
9 took down yes and you said no, that sort
10 of thing, you can correct those errors.
11 Or you can rely on the fact that she got
12 her job right and there is a video and
13 waive the right to review that
14 deposition transcript.

15 Which would you like to do?

16 THE WITNESS: I'd like to waive
17 that right.

18 MR. KASS: Now, I just have one
19 other question. But, Mr. Andresen, you
20 did state that you wanted to designate
21 certain portions as confidential, that
22 would require you to read the
23 deposition, unless you want to state you
24 want the whole thing confidential.

25 THE WITNESS: I would like the

1 whole thing to be confidential.

2 MR. KASS: All right. I think
3 that's it, Vel. Unless you have
4 anything.

5 MR. FREEDMAN: Nope.

6 MR. KASS: Okay.

7 MR. FREEDMAN: Thank you.

8 (Time Noted: 1:42 p.m.)

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1 C E R T I F I C A T E

2

3 COMMONWEALTH OF MASSACHUSETTS

4 SUFFOLK, SS.

5 I, MaryJo O'Connor, a Notary Public

6 in and for the Commonwealth of

7 Massachusetts, do hereby certify:

8 That GAVIN ANDRESEN, the witness

9 whose testimony is hereinbefore set forth,

10 was duly sworn by me and that such testimony

11 is a true and accurate record of my

12 stenotype notes taken in the foregoing

13 matter to the best of my knowledge, skill

14 and ability.

15 IN WITNESS WHEREOF, I have hereunto

16 set my hand and Notarial Seal this 29th day

17 of February 2020.

18

19

20

21 MARYJO O'CONNOR, RDR/RMR

22 Notary Public

23

24 My Commission expires:

25 September 12, 2025

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