

DONALD JOSEPH LYNAM

1

April 2, 2020

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

~~~~~

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

VIDEOTAPED DEPOSITION OF DONALD JOSEPH LYNAM

ON: Thursday, April 2, 2020

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

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

COURT REPORTER: Karen Wilsmore

- Defendant's Designations
- Plaintiffs' Objections
- Plaintiffs' Counters

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

**ON BEHALF OF THE PLAINTIFFS:**

BOIES SCHILLER FLEXNER LLP  
100 SE 2ND STREET, SUITE 2800  
MIAMI, FLORIDA 33131  
PH: +1 305 539-8400

BY: MR. ANDREW S. BRENNER

**ON BEHALF OF THE DEFENDANT:**

RIVERO MESTRE LLP  
2525 PONCE DE LEON BOULEVARD,  
SUITE 1000,  
MIAMI, FLORIDA 33134  
+1 305 445-2500

BY: MS. AMANDA McGOVERN

**ALSO PRESENT:**

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

DONALD JOSEPH LYNAM

3

April 2, 2020

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**WITNESS INDEX**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9 EXAMINATION BY MS. McGOVERN:

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

9:03:55 21 A. Yes.

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

9:04:18 1  
9:04:18 2  
9:04:19 3  
9:04:21 4  
9:04:26 5  
9:04:27 6  
9:04:30 7  
8  
9:04:34 9  
9:04:36 10  
9:04:40 11  
9:04:43 12  
9:04:48 13  
9:04:52 14  
9:04:56 15  
9:04:59 16  
9:05:03 17  
9:05:05 18  
9:05:08 19  
9:05:13 20  
9:05:18 21  
9:05:22 22  
9:05:25 23  
9:05:29 24  
9:05:31 25

A. Yes.

Q. Is that okay as well?

A. Yes, it is.

Q. Thank you. Mr. Lynam, have you been deposed before?

A. Never, no.

Q. So this is your first time being deposed, is that right?

A. That's true. I keep on the right side of the law.

Q. You've just been administered an oath to swear to tell the truth and I want to make sure that you understand that in this proceeding, that oath that you've taken is exactly the same oath as though you were standing in front of a jury in this case in the southern district of Florida to tell the truth. Do you understand that, Mr. Lynam?

A. Yes, I do.

Q. And the testimony that you're giving today by video conference, or video-taped conference, is going to be presented to a Miami jury as though you were sitting in the witness box looking at the Miami jury and answering the questions that I ask. Do you also understand that, Mr. Lynam?

A. Yes.

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

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

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

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

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

9:06:46 17 A. Yes.

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

9:06:54 20 A. No.

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

9:06:59 22 A. No.

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

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

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

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

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

9:07:32 9 A. No.

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

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

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

9:07:47 13 A. Yes.

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

9:07:56 15 A. 58 years.

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

Relevance

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

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

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

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

9:08:22 22 A. Yes.

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

9:08:26 24 A. Yes.

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



9:08:29 1 mother?

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

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

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

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

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

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

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

21 Q. What was your original position?

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

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

9:10:04 1

A. I was a trainee.

9:10:14 2

Q. And from a trainee to a wing commander, what does that entail? How do you become a wing commander, beginning as a trainee?

9:10:17 3

9:10:23 4

9:10:25 5

A. Doing more things right than you do wrong.

9:10:34 6

Q. Were you ever recognized in any official way for your work?

9:10:38 7

9:10:41 8

A. Yes. The primary award is the Order of Australia. I'm a member of the Order of Australia.

9:10:47 9

9:10:51 10

Q. Could you tell us what that is, please.

9:10:54 11

A. Well, that's - Australia has a series of awards. The highest awards are those within the Order of Australia and they are for doing something of conspicuous good to the community or the organization around you.

9:11:01 12

9:11:06 13

9:11:13 14

9:11:19 15

Q. Is there a particular focus of recognition in a particular field that you were awarded with the membership of the Order of Australia?

9:11:24 16

9:11:31 17

9:11:33 18

A. Yes. It was in recognition of original work that I did in information technology in the general area of logistics management.

9:11:39 19

9:11:43 20

9:11:51 21

Q. In the hierarchy of the Royal Australian Air Force, is a wing commander considered a high position?

9:11:55 22

9:11:59 23

A. It is a senior officer position. It's equivalent to lieutenant colonel in the American forces.

9:12:02 24

9:12:08 25

Q. Did your work in Australia involve - I believe

9:12:14

1

you said this, but to be specific, did your work in

9:12:18

2

Australia involve service overseas?

9:12:21

3

A. Yes.

9:12:23

4

Q. Where?

9:12:24

5

A. In South-East Asia and in the United States.

9:12:33

6

Q. And with respect to your work in South-East

9:12:37

7

Asia, what did you do?

9:12:40

8

A. I was there as maintenance support for

9:12:47

9

squadrons of aircraft, and that was in Singapore, Panang

9:12:55

10

and Ubon in Thailand during the Vietnam War.

9:13:01

11

Q. I believe you mentioned that you also worked

9:13:03

12

with the United States Air Force, is that correct?

9:13:05

13

A. Yes. I was on exchange for two and a half

9:13:09

14

years.

9:13:15

15

Q. And what did you do or what service did you

9:13:18

16

perform in that capacity with the United States Air

9:13:22

17

Force?

9:13:24

18

A. I held a number of positions. Do you want me

9:13:28

19

to go through a summary of the main ones?

9:13:32

20

Q. I would very much, thank you.

9:13:34

21

A. I started off as the officer in charge of the

9:13:42

22

flight line unit of approximately 328 people, which did

9:13:47

23

all the weapons and avionics maintenance and operational

9:13:55

24

support for 92 F-111A aircraft. During that period I was

9:14:05

25

elevated, for some period of months, into the maintenance

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

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

9:16:29 25 A. Yes.

9:16:33 1  
9:16:36 2  
9:16:42 3  
9:16:49 4  
9:16:54 5  
9:17:00 6  
9:17:07 7  
9:17:11 8  
9:17:14 9  
9:17:19 10  
9:17:23 11  
9:17:32 12  
9:17:39 13  
9:17:46 14  
9:17:50 15  
9:17:54 16  
9:17:59 17  
9:18:05 18  
9:18:10 19  
9:18:15 20  
9:18:23 21  
9:18:29 22  
9:18:35 23  
9:18:40 24  
9:18:44 25

Q. And what did you do when you went back to Australia? Did you stay in the military at that time?

A. I went into headquarters unit in Melbourne, in what is called support command. I went through a few positions there, but it was all focused on development of management systems and training other people. The primary area, and the area in which I earned the Order of Australia, was when I headed a group called the development of management systems and we developed some very good things that got the recognition, and that was a system for configuration management of all weapon systems in the Air Force and it also gave the capability for programme budgeting, which, as I understand, was then a world first and a two star general came out and spent some time looking at that, because the United States Air Force was very interested in that too. And I also developed a case tool, a computer-aided software engineering tool, which we called Menagerie, which was a mix-up of some of the initials of the people who were in that. I was the creative author of that and the other support staff supported me and did a lot of the running and one man, Nicholas Jones, he was my code cutter, and he was absolutely marvellous. He was a fellow very much like Craig Wright, with a brain that is incredible, very few social skills, but he had a magic memory and an

9:18:52 1  
9:18:57 2  
9:19:06 3  
9:19:09 4  
9:19:20 5  
9:19:23 6  
9:19:27 7  
9:19:32 8  
9:19:39 9  
9:19:43 10  
9:19:47 11  
9:19:50 12  
9:20:01 13  
9:20:11 14  
9:20:14 15  
9:20:22 16  
9:20:32 17  
9:20:38 18  
9:20:43 19  
9:20:47 20  
9:20:51 21  
9:20:59 22  
9:21:08 23  
9:21:16 24  
9:21:21 25

incredible brain.

Q. Did your work experience with computers continue after that?

A. Yes. I left the Air Force for no particular good reason - in fact, it got me into a lot of trouble with my wife - but I was going to be posted to Canberra, to the Department of Defence in Canberra, and I felt I didn't want to go, so I joined the Defence Credit Union as the national business development manager and I was there until I got offered a position at the State Electricity Commission and there I went into software development again and I headed a development team of 23 designers and code cutters, so I managed all the State Electricity Commissions and we developed - we rebuilt the whole thing, for logistics, supply and transport.

Q. During this period of time in your career, where you went from the Royal Australian Air Force to the United States Air Force, to South-East Asia, to the State Electricity Commission in Victoria, did Dr. Craig Wright know about your work?

A. Yes, he did. I was given the impression that he held me up as a little bit of a model for his life; he admired me. That was very flattering, but for no particular reason that I knew, he just held me up as a little bit of an image for him to emulate, but he's a lot

Hearsay, Speculation

9:21:27 1  
9:21:31 2  
9:21:35 3  
9:21:44 4  
9:21:46 5  
9:21:53 6  
9:21:56 7  
9:22:07 8  
9:22:12 9  
9:22:17 10  
9:22:21 11  
9:22:29 12  
9:22:36 13  
9:22:44 14  
9:22:49 15  
9:22:56 16  
9:22:59 17  
9:23:00 18  
9:23:05 19  
9:23:09 20  
9:23:11 21  
9:23:14 22  
9:23:16 23  
9:23:19 24  
9:23:24 25

smarter than I am.

Q. Did he, in some ways, do you believe, or is it your understanding, followed you as a role model?

A. He certainly has said to me a number of times that I was a role model for him and he did go in and join the Air Force and I believe he applied as well to go into the academy and certainly he had all the mental acuity and education that was necessary, but he didn't get into the academy and I understand - and, of course, I haven't seen any documents, I don't know, it's hearsay - I understand that he didn't succeed on the basis of his personality and I think we all know that Craig is not known for his people skills.

Hearsay

Q. Mr. Lynam, I'd like to ask you about Dr. Wright's relationship with his grandfather and the family influences on Dr. Wright.

A. Okay.

Q. Do you believe or is it your understanding that you have a close relationship and have always had a close relationship with Dr. Wright?

A. Your voice faded there. Did I have a close relationship with Craig?

Q. Yes.

A. It wasn't terribly close, it wasn't really much closer than you would expect of an uncle, I don't think.

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

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

9:24:04 7 A. Amateur radio.

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

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

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

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

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

9:25:04 23 THE DEPONENT: Yes.

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

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



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

20 BY MS. McGOVERN:

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

9:27:01 23 A. Yes.

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

9:27:09 1

A. That's certainly correct, and --

9:27:12 2

9:27:18 3

9:27:23 4

9:27:28 5

9:27:32 6

Q. In your opinion, based upon your involvement with Dr. Wright and, of course, your relationship with your own father, do you believe that Dr. Wright's grandfather was an important influence on Dr. Wright's life and work?

Speculation, lacks foundation, relevance

9:27:34 7

9:27:40 8

9:27:44 9

9:27:50 10

9:27:56 11

9:28:08 12

9:28:12 13

9:28:17 14

9:28:24 15

9:28:30 16

9:28:35 17

9:28:44 18

9:28:49 19

9:28:55 20

9:28:59 21

9:29:09 22

9:29:13 23

9:29:20 24

9:29:24 25

A. I think that my father, Craig's grandfather, had a great influence on him. As I said, as a child he used to go to my parents' house and stay there for child care during school holidays and so on, but my father, he was a radio engineer, he was one of the earliest senior radio engineers in Australia, radio and electronic engineers, and indeed, he was first in a lot of achievements. He went into the - this is getting to the influence - he went into the Australian Army at the beginning of World War II and he went into the signals division and although he continued to wear the signals badges, he actually belonged to a small intelligence group and they were made up of very few people from British intelligence, United States intelligence and Australian intelligence. My father also did electronics work during some of the same time and he wrote a thesis which was top secret, and I still never succeeded in getting it released so I could have it, and I think Craig attempted to get it too, but it's all locked up for some

9:29:29 1  
9:29:36 2  
9:29:46 3  
9:29:49 4  
9:29:54 5  
9:29:58 6  
9:30:09 7  
9:30:19 8  
9:30:22 9  
9:30:26 10  
9:30:34 11  
9:30:40 12  
9:30:46 13  
9:30:53 14  
9:30:58 15  
9:31:03 16  
9:31:12 17  
9:31:16 18  
9:31:20 19  
9:31:28 20  
9:31:32 21  
9:31:35 22  
9:31:38 23  
9:31:45 24  
9:31:49 25

reason, for the early warning radar along the Queensland coast during the war. A little - my father went with General McArthur, he was actually on General --

Q. Mr. Lynam, was your - in cryptology?

Relevance

A. Yes, he was an expert in cryptology, spoke multiple languages and he did interrogate high-value prisoners of war - that was in Australia - even though officially at the time those people never came into Australia, but they actually did, into an area called Indooroopilly. He - as I said, he was on General McArthur's staff and he reported to General McArthur's number 2, and I forget his name. I think he was a four star general. But when McArthur went back to the Philippines, when he returned to the Philippines, my father went as part of that headquarters core group and he was also involved in the code breaking for the - in the Coral Sea battle, which was - and that code breaking, a lot of that was instrumental in winning the battle against - the Coral Sea battle against the Japanese.

Q. Is that the Enigma code, Mr. Lynam? Are you referring to the Enigma code?

A. Now, I don't know what code the Japanese did. However, it was - he had the connections as well with Bletchley Park in the United Kingdom and they had the code-breaking machine that was so famous a movie has been

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

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

Speculation  
 Hearsay

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

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

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

9:33:58 1  
2  
3  
9:33:58 4  
9:34:00 5  
9:34:05 6  
9:34:09 7  
9:34:12 8  
9:34:16 9  
9:34:17 10  
9:34:21 11  
9:34:25 12  
9:34:34 13  
9:34:40 14  
9:34:47 15  
9:34:53 16  
9:34:59 17  
9:35:04 18  
9:35:09 19  
9:35:13 20  
9:35:18 21  
9:35:22 22  
9:35:28 23  
9:35:35 24  
9:35:44 25

THE DEPONENT: Yes.

BY MS. McGOVERN:

Q. Go ahead. Sorry.

A. Craig was able to play with that, as well as some other odds and ends that my father had down there in his shack.

Q. Mr. Lynam, did Dr. Wright show an interest in the Japanese culture?

Relevance, speculation, hearsay

MR. BRENNER: Object to the form.

THE DEPONENT: He certainly did. That interest developed with my father talking about the Japanese and their culture, but after 1975, when the Secrets Act allowed my father to talk, because he had a complete security close in on him for 30 years after the war and, in fact, he used to have surveillance, right up until 1975, outside my parents' house. There would often be - very often be a car out there with two people just observing, to make sure that the wrong people were not coming in and going out. I have no idea what they feared, but nevertheless, he was tightly contained. After that, he talked a lot more freely with Craig and he talked a lot more freely about cryptology and all his mathematics and so on and he actually did introduce Craig to a - who became a professor of mathematics in the United Kingdom, and he was one of the people at

9:35:48 1  
9:35:53 2  
9:36:00 3  
9:36:05 4  
9:36:10 5  
9:36:19 6  
9:36:20 7  
9:36:24 8  
9:36:26 9  
9:36:28 10  
9:36:33 11  
9:36:36 12  
9:36:41 13  
9:36:45 14  
9:36:49 15  
9:36:52 16  
9:36:57 17  
9:37:06 18  
9:37:12 19  
9:37:18 20  
9:37:22 21  
9:37:29 22  
9:37:36 23  
9:37:43 24  
9:37:52 25

Bletchley Park who developed that code breaking and my father had kept the contact all those years. Craig was thrilled to be able to contact and speak to this professor and he was thrilled when he said, "Yeah, I absolutely know Ronald Lynam and we did great work together." So that influenced him --

Q. Do you recall the professor's name, Mr. Lynam, do you recall the professor's name?

A. I certainly don't, but if you were to ask Craig that, I'm sure he probably would, because he was very impressed by the man.

Q. Would you describe Dr. Wright as having the intellectual capability of speaking on an equal level with his grandfather about these types of things, like mathematics and cryptology? **Speculation, foundation, hearsay**

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

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

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

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

9:40:26 1  
9:40:35 2  
9:40:43 3  
9:40:48 4  
9:40:52 5  
9:40:58 6  
9:41:12 7  
9:41:22 8  
9:41:25 9  
9:41:36 10  
9:41:43 11  
9:41:46 12  
9:41:53 13  
9:41:54 14  
9:42:00 15  
9:42:03 16  
17  
9:42:09 18  
9:42:10 19  
9:42:15 20  
9:42:18 21  
9:42:27 22  
9:42:33 23  
9:42:44 24  
9:42:52 25

recognitions and qualifications, to the extent that I believe he was one of the top three in the world and that was in an organization, a global organization, and I just cannot remember what it was called, but it had several initials by which it was generally known, and Craig became the CEO of all the Oceania area of the world for that organization. He went - he trained defense forces, he trained the police, including the New South Wales police in New South Wales - yes, in New South Wales, in security, internet security and cryptography, I believe.

Q. Mr. Lynam, are you familiar with anything that Dr. Wright developed involving token systems?

A. With tokens?

MR. BRENNER: "Token systems" did you say?

MS. McGOVERN: Token systems.

THE DEPONENT: Yes, yes. He did work --

BY MS. McGOVERN:

Q. Can you tell us about that, please?

A. Yes. He did work for organizations like - I think Centrebet it was called, but I think that was security rather than tokens, but for Lasseters Casino he did develop what I understand to be the world's first token system enabling global gambling, internet gambling, using all Fiat currencies, all international currencies, so basically doing the same type of thing as Bitcoin, a

Speculation, foundation (last sentence only as to both)



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

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

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

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

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

9:44:00 14 BY MS. McGOVERN:

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

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

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

9:44:30 22 BY MS. McGOVERN:

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

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

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

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

9:45:06 5 BY MS. McGOVERN:

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

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

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

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

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

9:46:32 23 A. Yes.

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

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

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

9:48:01 14 A. Yes.

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

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

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

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

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

9:49:41 12 A. Yes.

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

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

9:49:53 17 BY MS. McGOVERN:

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

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

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

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

Hearsay

9:50:25 1  
9:50:26 2  
9:50:30 3  
9:50:34 4  
9:50:47 5  
9:50:53 6  
9:50:57 7  
9:51:03 8  
9:51:07 9  
9:51:12 10  
9:51:16 11  
9:51:27 12  
9:51:31 13  
9:51:37 14  
9:51:42 15  
9:51:48 16  
9:51:52 17  
9:51:57 18  
9:52:02 19  
9:52:08 20  
9:52:15 21  
9:52:20 22  
9:52:29 23  
9:52:36 24  
9:52:42 25

Q. I'm sorry, go ahead.

A. What did surprise me was later on, when it came to the point he said he was planning actually to do it, to create the Bitcoin and he was going to then publish it as - with a pseudonym. I thought, "Well, that's an odd thing to do" and I asked him why are you going to do it, instead of getting the credit for yourself, and he said well, he felt it was - since it was a monetary system, it was important - and he didn't know exactly where it would go, it was important to protect the privacy of himself and his family, but then he said "Satoshi Nakamoto". That was a bit of a surprise but it didn't amaze me because of his attachment to all things Japanese and the fact that in his bedroom he had a katana, a Japanese sword, there, as well as all sorts of other Japanese things. He had these little devices that - I don't know where they came from, where he could buy them, but things that ninjas, in historic times, used to throw. These would have been toys, of course, but the sword was real. So being Satoshi Nakamoto was a surprise but not a shock. I asked him how did he come up with that name and he told me that he named it - I understood he was telling me it was two philosophers. One was of the ilk of Adam Smith, of whom you're probably familiar. He was a Scottish philosopher economist and he wrote the book The Wealth of

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

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

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

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

20 BY MS. McGOVERN:

9:55:06 21 Q. Of course.

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

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

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

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

9:58:29 6 BY MS. McGOVERN:

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

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

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

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



0:00:17 1  
0:00:18 2  
0:00:21 3  
0:00:24 4  
0:00:29 5  
0:00:33 6  
0:00:34 7  
0:00:34 8  
0:00:37 9  
0:00:41 10  
0:00:48 11  
0:00:55 12  
0:01:00 13  
0:01:06 14  
0:01:14 15  
0:01:20 16  
0:01:25 17  
0:01:27 18  
0:01:36 19  
0:01:38 20  
0:01:44 21  
0:01:49 22  
0:01:53 23  
0:01:58 24  
0:02:01 25

context.

BY MS. McGOVERN:

Q. And with respect to the books that you're referring to, you became familiar with the books they co-authored on your own, this was not - if I understand your testimony correctly --

A. No.

Q. -- this was not Dr. Wright speaking to you about David Kleiman, is that right?

A. Back in the time when Craig was doing a lot of cryptography work, he sent me papers, he sent me - via the internet he sent the papers - he sent me images of cards and he also sent me image of some of the books, so I had actually seen those back in the - I think around the mid-2000s.

Q. Mr. Lynam, those books don't have anything to do with the block chain, correct?

A. Nothing whatsoever, but I had never noted Dave Kleiman, Craig didn't talk to me in particular about him, he just showed the books, and I had completely forgotten the name until I went back researching and found images of the books on the internet and then I said, "Bang, there's Dave Kleiman on the books." So I just want to come out absolutely clear with that. No, Craig didn't discuss with me, it had nothing - I had no knowledge of

0:02:04 1  
0:02:10 2  
0:02:17 3  
0:02:19 4  
0:02:23 5  
6  
0:02:28 7  
0:02:32 8  
0:02:40 9  
0:02:44 10  
0:02:49 11  
0:02:54 12  
0:02:59 13  
0:03:04 14  
0:03:10 15  
0:03:11 16  
0:03:18 17  
0:03:25 18  
0:03:31 19  
0:03:36 20  
0:03:43 21  
0:03:49 22  
0:03:56 23  
0:04:01 24  
0:04:05 25

Dave Kleiman actually, but I did see his name as a co-author with Craig in the mid-2000s.

Q. But just to be clear with respect to your testimony, the books that you're referring to were not books concerning cryptology or the Bitcoin block chain, correct?

A. They did cover security in cryptology but they did not in any way talk about block chain or Bitcoin, completely separate. They were training books for security forces and that certainly had nothing to do with any form of digital money or block chain. The target of the books was totally different.

Q. Mr. Lynam, did there come a point in time when Dr. Wright needed an extensive network of computers, that you became aware of?

Hearsay

A. Yes. As soon as he went live with Bitcoin, which was in the beginning of 2009 - part of the operating principle of Bitcoin is that there is as big as possible, I understand, network of computers hooked up to run nodes and to do mining and this is what creates the proof of work and the verification of all the transactions, so he wanted as big - he wanted millions, if he could get them, to sign up and do it.

Q. Mr. Lynam, did you offer to run a node on his behalf?

Hearsay, relevance

0:04:05 1  
0:04:08 2  
0:04:13 3  
0:04:19 4  
0:04:25 5  
0:04:31 6  
0:04:35 7  
0:04:41 8  
0:04:51 9  
0:04:56 10  
0:05:03 11  
0:05:08 12  
0:05:15 13  
0:05:19 14  
0:05:25 15  
0:05:27 16  
0:05:31 17  
0:05:35 18  
0:05:39 19  
0:05:44 20  
0:05:47 21  
0:05:57 22  
0:06:04 23  
0:06:09 24  
0:06:14 25

A. Yes. When Craig was telling me about it - he didn't call me to ask about it, but he told me he's going live, to let me know, and ran through a little bit of what he needed and I said, "Well, look, I've got an almost brand new Dell XPS computer that's pretty hot. How about I run one of these nodes for you?" And he said, "You'd do that?" And I said, "Yeah. Great." So I did that and I think I'm glad I did it, I think I - I hope it was beneficial for him, but he sent me software, I think via FTP, with the instructions on how to put it in there and set it up and my role from then on was just simply to keep it going 24/7 and my computer was excellent in that that particular computer had a little video screen on the box, so I could monitor the task manager and see that it was processing, how much processing load there was, and that it was always running, even with the screen, and all that sort of thing, turned off. So that was great. I had to upgrade the computer, though, even though it was a hot computer, because it actually did become hot, there seemed to be such a computing load that it ran hot, and so I upgraded the power supply. The box, I think, came - the 450 watt power supply. I upgraded it to a 750 watt. I put in a fan in the front of the box. It was well designed to be able to take a fan there. So my lovely quiet, fancy

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

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

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

18 MR. BRENNER: Who's talking?

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

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

8 BY MS. McGOVERN:

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

Leading, foundation

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

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

1

BY MS. McGOVERN:

0:10:58 2

Q. Mr. Lynam, do you have anything that would cause you to believe that Dr. Wright was working in a partnership or a joint venture with David Kleiman in connection with the Bitcoin block chain?

Leading, foundation, speculation

0:11:06 3

0:11:15 4

0:11:24 5

0:11:29 6

MR. BRENNER: Object to the form.

0:11:31 7

THE DEONENT: No, I don't, and I have absolutely no knowledge of it and since Craig never mentioned Dave Kleiman and any such relationship to me, there was nothing to trigger me to think that that might be so. I could speculate in my mind and wonder why would it be so, but no, nothing was ever mentioned to me and I had no knowledge of any such thing.

0:11:36 8

0:11:41 9

0:11:46 10

0:11:51 11

0:11:55 12

0:11:59 13

0:12:02 14

THE VIDEOGRAPHER: This is the videographer. I have five minutes of tape.

0:12:04 15

0:12:06 16

MS. McGOVERN: I'm going to finish my questions in those five minutes.

0:12:13 17

0:12:15 18

BY MS. McGOVERN:

0:12:26 19

Q. Mr. Lynam, do you have any coins?

Relevance

0:12:31 20

A. Do I have any coins?

0:12:33 21

Q. Yes.

Relevance

0:12:34 22

A. No, none, none whatsoever. I bought two --

0:12:41 23

Q. And has Dr. - I apologize. Go ahead.

Relevance

0:12:43 24

A. I bought two, I think, in 2010 because I just wanted to see how that worked. I was a bit scared of it

0:12:47 25

0:12:52 1  
0:12:58 2  
0:13:02 3  
0:13:06 4  
0:13:11 5  
0:13:16 6  
0:13:19 7  
0:13:21 8  
0:13:25 9  
0:13:28 10  
0:13:29 11  
0:13:33 12  
0:13:34 13  
0:13:36 14  
0:13:39 15  
0:13:41 16  
0:13:44 17  
0:13:46 18  
0:13:51 19  
0:13:53 20  
0:13:56 21  
0:13:58 22  
0:14:00 23  
0:14:05 24  
0:14:06 25

all, so I kept it to a purchase of less than \$5 and I got two Bitcoin for less than \$5, but I've completely - didn't pay much attention to it and I've completely lost the keys, so I've lost my \$5.

Q. And has Dr. Wright, or anybody else, provided you any compensation in connection with your testimony today?

A. None whatsoever, except a nice fuzzy - warm fuzzy feeling that I'm helping.

MS. McGOVERN: Thank you, Mr. Lynam. I have no further questions.

THE VIDEOGRAPHER: We'll go off the record.

MR. BRENNER: Before you go off the record - I know you had a couple of minutes - I just want to note that it appears that, probably because of the technical difficulties, some of the objections may not be getting through, and I know everyone is doing the best we can, I'm just noting that. I have no idea how many objections you've gotten, so - we'll deal with that later, but I just wanted to make that notation for the record.

Ms. McGovern, you're done with your questions?

MS. McGOVERN: Yes, I am.

MR. BRENNER: Okay. Let's take a five-minute break and then we'll do the cross-examination.

THE VIDEOGRAPHER: Going off the record - end of

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

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

3 (Break taken.)

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

0:20:17 5 THE VIDEOGRAPHER: Going back on the record at

0:20:21 6 10:20 a.m. Commencement of tape 2. Proceed.

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

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

0:20:39 12 A. Yes.

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

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

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

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

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

0:21:06 22 A. Yes.

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



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

0:21:22 2 A. Yes.

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

0:21:27 5 A. Yes.

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

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

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

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

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

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

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

0:22:27 19 A. I apologize. At just verging on 80, my mental  
0:22:33 20 acuity is not as good as it used to be. I'm just trying  
0:22:36 21 to remember how many times. It is very few times.

0:22:46 22 Between three and five. I don't think it's more than  
0:22:48 23 five. I think it's probably three.

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

0:22:59 1  
0:23:00 2  
0:23:03 3  
0:23:05 4  
0:23:07 5  
0:23:10 6  
0:23:16 7  
0:23:23 8  
0:23:27 9  
0:23:31 10  
0:23:45 11  
0:23:48 12  
0:23:52 13  
0:23:54 14  
0:23:57 15  
0:23:58 16  
0:24:01 17  
0:24:04 18  
0:24:10 19  
0:24:27 20  
0:24:29 21  
0:24:34 22  
0:24:37 23  
0:24:38 24  
0:24:41 25

that firm?

A. I think the first person I spoke to was Zaharah Markoe.

Q. How many times would you estimate that you spoke with Ms. Markoe?

A. Once, but I think she was in on another call where I was speaking to Ms. McGovern.

Q. Do you know when - and I know it is hard to pinpoint it - can you tell me the month when you first spoke with Ms. Markoe?

A. I don't remember.

Q. Do you remember the year, sir?

A. 2019.

Q. Do you know whether it was the first or second half of that year?

A. The second half.

Q. And in that first conversation with Ms. Markoe, was she alone or was Ms. McGovern part of that first conversation?

A. I do not remember.

Q. Okay. Do you know - did she call you or did you call her? What was the first form of communication?

A. She called me.

Q. When she called you, had you been told to expect her call?

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

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

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

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

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

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

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

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

0:25:44 17 A. Yes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

0:27:30 2 A. Yes.

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

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

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

0:28:03 11 A. Correct.

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

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

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

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

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

25 BY MR. BRENNER:

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

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

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

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

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

0:30:12 14 A. Yes.

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

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

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

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

0:31:36 7 A. Correct.

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

0:31:46 12 A. Yes.

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

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

0:32:03 19 BY MR. BRENNER:

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

0:32:07 21 A. No.

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

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

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

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

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

0:32:31 4 BY MR. BRENNER:

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

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

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

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

0:32:48 10 Q. You did?

0:32:49 11 A. Yes.

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

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



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

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

0:34:15 5 A. Yes.

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

0:34:19 8 A. It was.

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

0:34:21 10 A. No.

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

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

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

0:35:23 1 A. Yes.

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

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

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

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

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

0:35:54 7 A. Yes.

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

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

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

0:36:03 11 email?

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

0:36:08 13 an email.

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

0:36:16 15 A. Yes.

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

0:36:19 17 A. No.

0:36:20 18 Q. Okay. Let me ask you you talked a lot about

0:36:26 19 the gentleman who was referred both to as Dr. Wright's

0:36:30 20 grandfather and your father, so let me ask you a few

0:36:33 21 questions about him, okay?

0:36:35 22 A. Yes.

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

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

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

0:36:44 1

your date of birth?

0:36:45 2

A. [REDACTED]

0:36:49 3

Q. 40?

0:36:50 4

A. 40.

0:36:52 5

Q. And your father - and I apologize, you said his

0:36:55 6

name. His name was what again?

0:36:57 7

A. Ronald Andrew Lynam.

0:37:00 8

Q. And Ronald Lynam, because otherwise we'll have

0:37:06 9

many Mr. Lynam, Ronald Lynam, when was he born?

0:37:11 10

A. 1916.

0:37:14 11

Q. He's passed away or is he still alive?

0:37:17 12

A. No, he passed away at 92.

0:37:21 13

Q. He passed away in 1992. Do you know how old

0:37:24 14

Dr. Wright is?

0:37:37 15

A. 49, I think. I know when he was born. He was

0:37:41 16

born in October 1970, three months before my son, so I

0:37:49 17

remember that and I can't remember my son's name either.

0:37:52 18

I'd have to do quick math - not his name, his age.

0:37:58 19

Q. You already got where we needed to be. So

0:38:00 20

Dr. Wright was born in 1970, correct?

0:38:03 21

A. Correct.

0:38:04 22

Q. And your father, do you recall his date of

0:38:11 23

death, what month he passed away?

0:38:14 24

A. No, I do not.

0:38:16 25

Q. Okay. Because we don't know the month, your

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

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

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

0:38:35 6 A. Correct.

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

0:38:40 9 A. Absolutely not.

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

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

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

0:38:47 13 A. Correct.

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

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

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

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

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

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

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

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

8 Q. Okay.

9 A. It's --

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

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

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

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

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

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

0:41:50 3 A. Yes.

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

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

0:41:53 7 BY MR. BRENNER:

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

0:42:04 12 A. I do.

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

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

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

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

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

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

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

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

0:45:23 1 visiting in that area.

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

0:45:41 4 A. Yes.

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

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

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

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

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

0:46:48 17 BY MR. BRENNER:

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

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

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

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

24 Q. Okay.

0:47:15 25 A. But --



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

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

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

0:47:45 9 A. I do. I have great respect and sympathy for  
0:47:48 10 Craig. Relevance, improper expert opinion,  
foundation, speculation

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

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

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

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

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

0:50:00 14           A. Yes.

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

0:50:20 20           A. Yes.

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

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

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

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

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

0:52:49 1

expense as well, but --

0:52:54 2

Q. Not from me.

0:52:56 3

A. But with running the node, which I thought was the question, no, no compensation for that.

0:52:59 4

0:53:04 5

Q. Sir, you want to help your nephew through your testimony today, that's fair to say, is it not?

0:53:08 6

0:53:13 7

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

0:53:18 8

THE DEPONENT: Yes. If I didn't think that

0:53:21 9

absolutely honest answers would be of assistance to

0:53:31 10

Craig, I probably would have said that I don't want to

0:53:36 11

depose and I understand there was no real compulsion

0:53:42 12

until I got that subpoena, so there wasn't compulsion. I

0:53:48 13

agreed to do it because I have so much faith in Craig and

0:53:54 14

my knowledge of what happened through that time that I

0:54:01 15

have high confidence that Craig has behaved correctly and

0:54:10 16

my understanding of it is correct and I can answer all

0:54:14 17

the questions with absolute honesty.

18

BY MR. BRENNER:

0:54:18 19

Q. I'm not suggesting anything, I'm just - is it

0:54:22 20

fair to say that you, and I think you did say, you agreed

0:54:25 21

to be - "deposed" is the word you used - because you

0:54:29 22

believed that your testimony, truthful testimony, would

0:54:32 23

help your nephew, correct?

0:54:39 24

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

0:54:41 25

THE DEPONENT: Now, I'm not a lawyer. It may be

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

0:55:00 5 BY MR. BRENNER:

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

0:55:09 8 A. Yes.

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

0:55:21 12 A. Okay.

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

0:55:34 16 A. Correct.

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

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

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

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

0:56:17 1

and tables.

0:56:21 2

Q. Although - I'm sorry. Let me give you a

0:56:23 3

blanket apology. It's hard for me to know always when

0:56:26 4

you're done, so when I do cut you off, which I have done

0:56:30 5

several times inadvertently, and Ms. McGovern did as

0:56:33 6

well, you just let me know, okay? It is nothing

0:56:35 7

intentional, okay?

0:56:38 8

A. Certainly, and I apologize in turn because I

0:56:44 9

acknowledge that my brain doesn't click over just as

0:56:48 10

quickly as it used to - I used to be pretty damn good -

0:56:55 11

but I want to go slowly and I want to try to be

0:56:58 12

absolutely certain that when I - what I say is the best

0:57:04 13

rendition of what my brain tells me.

0:57:08 14

Q. Okay. To try to help us, I'm going to try to

0:57:11 15

ask short questions, okay?

0:57:13 16

A. Okay.

0:57:14 17

Q. When you received the draft paper from

0:57:17 18

Dr. Wright, you described it today as being highly

0:57:22 19

technical, right?

0:57:23 20

A. Yes.

0:57:24 21

Q. And although you had helped Dr. Wright edit

0:57:28 22

some of his other papers, this one you told him you

0:57:31 23

couldn't help him with because it was highly technical?

0:57:34 24

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

0:57:37 25

BY MR. BRENNER:

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

0:57:39 2 A. No, that's not what I intended to say, if

0:57:42 3 that's what I did say. What --

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

0:57:45 5 A. What I said was that I decided I did not

0:57:51 6 attempt. I didn't tell him I wouldn't because of, I just

0:57:55 7 simply decided I wouldn't attempt to do it.

0:57:59 8 Q. Okay. Fair enough. So you did not attempt to

0:58:01 9 edit that paper, correct?

0:58:02 10 A. Correct.

0:58:05 11 Q. You described it, in the form you got it, as

0:58:08 12 being, and I quote - I think I'm quoting this, you

0:58:12 13 described it as being "poorly written", is that fair?

0:58:15 14 A. Yes.

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

0:58:20 16 paper?

0:58:21 17 A. Yes.

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

19 correct?

0:58:29 20 A. Thank God.

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

0:58:31 22 BY MR. BRENNER:

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

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

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

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

0:58:42 2 Q. If someone said that you edited that paper,

0:58:45 3 that would be incorrect?

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

0:58:48 5 Q. If someone said that you helped set up Bitcoin,

0:58:52 6 that would also be incorrect?

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

0:59:07 8 Q. Sure --

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

0:59:10 10 Q. Sure.

0:59:13 11 A. As I explained, there were a lot of people, and

0:59:16 12 an expanding number of people, that were involved in

0:59:19 13 Bitcoin, and that's the whole nature of Bitcoin, and I

0:59:25 14 was one of those people, I ran a node, but did I have any

0:59:30 15 technical input into establishing it or operating it?

0:59:36 16 The answer is no.

0:59:38 17 Q. Other than after Bitcoin, as you said, went

0:59:41 18 live and you helped run a node, did you help set up

0:59:44 19 Bitcoin?

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

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

0:59:53 22 A. In fact, I didn't even really read much about

0:59:57 23 it after that.

1:00:00 24 Q. You said that - I'm not sure exactly what you

1:00:06 25 said. Do you recall how - in what format Craig - excuse



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

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

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

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

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

1:01:31 16 A. No.

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

1:01:55 20 A. Yes.

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

1:02:06 24 A. Yes.

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

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

1:02:23 4 A. Yes.

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

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

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

1:02:38 9 A. Yes.

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

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

14 BY MR. BRENNER:

1:02:53 15 Q. Go ahead.

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

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

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

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

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

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

1:05:55 1 Q. Right. So in the last couple months you did

1:05:58 2 some - I think you said Google searches, right?

1:06:01 3 A. Yes.

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

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

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

1:06:36 13 A. Yes.

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

1:06:39 16 A. No.

1:06:40 17 Q. Why not?

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

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

1:06:48 20 What would I ask?

21 BY MR. BRENNER:

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

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

2 THE DEPONENT: No.

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

1:07:14 4 BY MR. BRENNER:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1:11:40 23 BY MR. BRENNER:

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

1 that correct?

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

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

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

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

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

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

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

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

1:12:36 16 A. Who?

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

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

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

1:12:55 23 A. No.

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

1:13:00 1

A. No.

1:13:04 2

Q. Other than the two Bitcoin that you said that you purchased - I think you said for under \$5 - did you ever have any ownership interest in any Bitcoin?

1:13:06 3

1:13:10 4

1:13:14 5

A. No.

1:13:14 6

Q. Did you have any ownership interest in any company that Craig Wright or Dr. Wright was associated with?

1:13:17 7

1:13:19 8

1:13:20 9

A. No.

1:13:21 10

Q. Did you have any ownership interest in any intellectual property developed in whole or in part by Dr. Craig Wright?

1:13:25 11

1:13:30 12

1:13:31 13

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

1:13:37 14

1:13:53 15

MR. BRENNER: I'm almost done, sir. Let's take a five-minute break.

1:14:12 16

1:14:13 17

THE VIDEOGRAPHER: Going off the record at 10:14 a.m. [sic]

1:14:16 18

1:14:18 19

(11:14 a.m.)

20

(Break taken.)

1:21:11 21

(11:21 a.m.)

1:21:11 22

THE VIDEOGRAPHER: Going back on the record at 10:21 a.m. - 11:21 a.m. Proceed.

1:21:14 23

1:21:17 24

BY MR. BRENNER:

1:21:20 25

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



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

1:21:25 2 A. Okay.

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

1:21:30 5 A. No.

1:21:32 6 Q. Have you ever heard of any company that has the  
1:21:34 7 name W&K in it - bad question. Let me try it again.  
1:21:43 8 Have you ever heard of a company called W&K Information  
1:21:47 9 Defense?

1:21:47 10 A. No.

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

1:21:58 14 A. No.

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

1:22:03 17 A. No.

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

1:22:07 20 A. No.

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

1:22:13 23 A. No.

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

1:22:17 1

A. No.

1:22:18 2

Q. Have you ever had any ownership interest in a company called Wright International Investments?

1:22:20 3

1:22:23 4

A. No.

1:22:24 5

Q. Have you ever heard of a company called Information Defense Pty Ltd?

1:22:26 6

1:22:30 7

A. No.

1:22:30 8

Q. Have you ever had any ownership interest in that company?

1:22:33 9

1:22:33 10

A. No.

1:22:34 11

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

1:22:36 12

A. No.

1:22:37 13

Q. Have you ever been employed by that company?

1:22:39 14

A. No.

1:22:41 15

Q. Have you ever - by the way, when you said you were running a node, were you mining Bitcoin?

1:22:44 16

1:22:47 17

A. No. I actually have no idea how the mining is done. It was hands-off and it was all remotely controlled by Craig or Satoshi.

1:22:52 18

1:22:57 19

1:23:00 20

Q. That's what I thought you said. You basically had a computer - Dr. Wright sent you some software to download and told you how to get it running and that was your involvement?

1:23:02 21

1:23:08 22

1:23:10 23

1:23:11 24

A. That was it.

1:23:13 25

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

1:23:16 1

BY MR. BRENNER:

1:23:16 2

Q. That was it, sir?

1:23:17 3

A. That was it, that was my involvement, except I

1:23:21 4

had to keep monitoring it to make sure it was running,

1:23:23 5

which I did.

1:23:24 6

Q. Okay. And then you stopped that, I think you

1:23:24 7

said, in 2011 --

1:23:26 8

A. 2011.

1:23:28 9

Q. Have you ever heard of a company called

1:23:30 10

Tulip Trading?

1:23:31 11

A. No.

1:23:32 12

Q. Have you ever had any ownership interest in

1:23:36 13

Tulip Trading?

1:23:37 14

A. No.

1:23:38 15

Q. Have you ever been employed by Tulip Trading?

1:23:40 16

A. Can I stop you there --

1:23:41 17

Q. Sure.

1:23:45 18

A. -- and get clarification on the way I answer?

1:23:47 19

Have I ever heard of Tulip Trading? Before the last week

1:23:56 20

or so, have I ever heard of Tulip Trading? The answer

1:24:00 21

would be absolutely no. But, as I said, I've been trying

1:24:04 22

to do some reading and I see Tulip Trust - I'm not sure

1:24:11 23

about Tulip Trading - but Tulip Trust, I'm sure it said

1:24:17 24

Tulip Trust - mentioned on the internet.

1:24:21 25

Q. You did some internet research and you saw

1:24:23 1 something about Tulip Trust?

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

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

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

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

1:24:41 8 BY MR. BRENNER:

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

1:24:54 13 A. No.

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

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

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

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

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

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

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

1:25:34 3 A. No.

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

1:25:37 6 A. No.

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

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

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

1:25:49 11 A. No.

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

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

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

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

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

1:26:31 23 A. One.

1:26:32 24 Q. Just one?

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

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

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

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

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

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

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

1:27:31 14 Q. Which business?

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

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

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

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

1:27:47 21 A. No.

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

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

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

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

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

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

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

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

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

1:29:37 18 BY MR. BRENNER:

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

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

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

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

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

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

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

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

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

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

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

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

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

1:31:49 22 Q. Okay.

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

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

1:31:55 25 A. Yes.



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

1:31:58 2 A. Yes.

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

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

1:32:26 9 Q. Okay.

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

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

16 THE DEPONENT: Okay.

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

1:32:57 18 THE DEPONENT: Okay.

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

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

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

1:33:08 24 THE VIDEOGRAPHER: Going off the record at

1:33:12 25 11:33 a.m. End of tape 2. End of videotaped deposition

1:33:16 1  
1:33:20 2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

of Don Lynam. Total number of tapes, 2.

**(Deposition hearing concluded)**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATE OF WITNESS**

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

**ERRATA**

| <b>Page/Line No.</b> | <b>Description</b> | <b>Reason for Change</b> |
|----------------------|--------------------|--------------------------|
|----------------------|--------------------|--------------------------|

Signed.....

Date.....

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATE OF COURT REPORTER**

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

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

Signed .....  
*Karen Wilsmore*

*Date*.....