

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

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

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

plaintiffs,

v.

CRAIG WRIGHT,

defendant.

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**JOINT SUPPLEMENTAL TRIAL WITNESS LIST**

The parties respectfully submit their proposed Supplemental Joint Witness List pursuant to this Court's minute entry [D.E. 655].

#### **A. FACT WITNESSES**

- 1. Gavin Andresen.** Gavin Andresen resides in Amherst, Massachusetts, and is a software developer. Mr. Andresen is currently an Entrepreneur-in-Residence (a volunteer position) at University of Massachusetts in its Data Sciences department. He was the chief scientist of the Bitcoin Foundation for several years starting in or around 2012. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 2 hours (by defense). By designation only.
- 2. Kimon Andreou.** Kimon Andreou resides in Broward County, Florida. He has been an employee of Royal Caribbean Cruise Line since 2006. He has a Master of Science in Management Information Systems from Florida International University. Mr. Andreou was previously employed at S-Doc from 2002 to 2004. Estimated time for direct and cross-examination: 1 hours (by plaintiffs), 2 hours (by defense).
- 3. Carter Conrad.** Carter Conrad resides in West Palm Beach, Florida. He is an owner of Computer Forensics LLC, a Florida Limited Liability Company, which was formed in 2012 with Patrick Paige and David Kleiman. He attended Western Maryland College and Columbia Southern University. He was formerly a manager and the Lead Computer Forensic Examiner for Delivered Data, LLC, in Florida. Estimated time for direct and cross-examination: 1.25 hours (by plaintiffs), 2 hours (by defense).
- 4. Sarah Gonzalez.** Sarah Gonzalez resides in Miami-Dade County, Florida, and is a paralegal at Rivero Mestre, LLP, counsel for the defense. She will testify regarding defense summary exhibits. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 30 minutes (by defense).

5. **Kaleb Jones.** Kaleb Jones resides in Port Saint Lucie, Florida. He attended college in Palm Beach, Florida, and his mother is Kursten Karr. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1 hour (by defense).
6. **Joseph Karp.** Joseph Karp resides in Palm Beach Gardens, Florida. He is a lawyer and founder of Karp Law Firm, P.A., a Florida estate planning, elder law and probate law firm providing services in Florida. Estimated time for direct and cross-examination: 1.25 hours (by plaintiffs), 2 hours (by defense).
7. **Kursten Karr.** Kursten Karr resides in Port Saint Lucie, Florida. Her current employment is unknown. Ms. Karr was incarcerated in Florida. She is a former employee of the T-Sound Club in West Palm Beach, Florida. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1 hour (by defense).
8. **Ira Kleiman.** Plaintiff Ira Kleiman resides in Palm Beach Gardens, Florida. He is self-employed as a web-site designer and affiliate marketer. He attended Palm Beach Community College. Ira Kleiman is David Kleiman's brother and the court appointed personal representative of his estate. Estimated time for direct and cross-examination: 1 day (by plaintiffs), 1 day (by defense).
9. **Debra Kobza.** Debra Kobza resides in St. Augustine, Florida. She was the founder of Global Institute of Cyber Security Research a/k/a GICSR. She has also been employed by the National Credit Union and the International Association of Certified ISAOs. Estimated time for direct and cross-examination: 30 minutes (by plaintiffs), 15 minutes (by defense). By designation only.
10. **David Kuharcik.** David Kuharcik resides in Palm Beach County, Florida and works in North Palm Beach, Florida as a Certified Public Accountant and owner of David Scott Kuharcik

C.P.A, P.A, a Florida corporation. Estimated time for direct and cross-examination 1.5 hours (by plaintiffs), 3 hours (by defense).

**11. John Doe**, a confidential third party deponent, who resides outside the jurisdiction of the Court, whose deposition was taken on April 30, 2020, and whose identity and deposition testimony are subject to a protective order issued by the Court.<sup>1</sup> See ECF Nos. 474, 475, 598, and 603. Estimated time for direct and cross-examination: 20 minutes (by plaintiffs), 20 minutes (by defense). By designation only.

**12. Donald J. Lynam**. Donald Lynam resides in Victoria, Australia. Mr. Lynam served in the Royal Australian Air Force. Mr. Lynam did a tour of exchange in the United States Air Force at Nellis Air Force Base in Las Vegas, Nevada. He later worked for the Australian Defense Credit Union and later at the State Electricity Commission. Estimated time for direct and cross-examination: 30 minutes (by plaintiffs), 1.5 hours (by defense). By designation only.

**13. Corporate Representative / Records Custodian of Miami VA Hospital**. The Miami Veterans Affairs Hospital is located in Miami, Florida. Estimated time for direct and cross-examination: 10 minutes (by plaintiffs), 30 minutes (by defense).

**14. Jimmy Nguyen**. Jimmy Nguyen resides in Seattle, Washington. Mr. Nguyen is currently the President of the Bitcoin Association. He is a former officer of nChain Group from February 2017 through March 2020. Mr. Nguyen is also an attorney that has practiced at several law firms: Foley & Lardner, in its Los Angeles office; Wildman, Harrold, Allen & Dixon in its Los Angeles office; and Davis Wright Tremaine LLP in its Los Angeles office. In 2017 he

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<sup>1</sup> The witness has counsel who have appeared in this action and who have made requests to the Court to keep Mr. Doe's identity secret. Absent court order to disclose Mr. Doe's name, the Parties have (in consultation with counsel for Mr. Doe) filed the list per the above, and will allow counsel for this witness to address any concerns the Court has with this entry.

started a company called New Win Digital in West Hollywood, California. He has served as a board member of Centbee and TAAL Distributed Information Technologies. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 4 hours (by defense).

**15. Andrew O'Hagan.** Andrew O'Hagan resides in London, United Kingdom. He is a Scottish novelist and author, as well as an editor-at-large of the London Review of Books and Esquire Magazine. He is currently the visiting professor of writing at King's College London. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 1 hour (by defense).  
By designation only.

**16. Patrick Paige.** Patrick Paige resides in West Palm Beach, Florida. He is an owner of Computer Forensics LLC, a Florida Limited Liability Company, which was formed in 2012 with Carter Conrad and David Kleiman. Prior to Computer Forensics LLC, Mr. Paige was an employee of the Palm Beach County Sheriff's Office. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 2 hours (by defense).

**17. Robert Radvanovsky.** Robert Radvanovsky resides in Chicago, Illinois. He is a cybersecurity researcher. Mr. Radvanovsky works as a cybersecurity researcher. He also owns and operates an organization called Infracritical. Estimated time for direct and cross-examination: 30 minutes (by plaintiffs); 30 minutes (by defense). By designation only.

**18. Brendan Sullivan.** Brenden Sullivan resides in New York City. He is a journalist for Modern Consensus. Estimated time for direct and cross-examination: 30 minutes (by plaintiffs). By designation only. Defendant objects to plaintiffs' proposed use of Mr. Sullivan's declaration at trial; Mr. Sullivan was not deposed. If Mr. Sullivan testifies at trial, defendant reserves 30 minutes for cross-examination.

**19. W&K Info Defense Research LLC, Plaintiff (Zachary Eisner Corporate**

**Representative).**<sup>2</sup> W&K Info Defense Research LLC (“W&K”) is a Florida Liability company with its principal place of business in West Palm Beach, Florida. Zachary Eisner is an attorney who resides in Miami, Florida, who has been hired as W&K’s corporate representative. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 3 hours (by defense).

**20. Jonathan Warren.** Jonathan Warren resides in Brooklyn, New York. He is the creator of Bitmessage. Mr. Warren is one of the founders of a company called HighSide Incorporated and was previously employed by Coin Apex and Bitinstant. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1.5 hours (by defense). By designation only.

**21. Ramona Watts.** Ramona Watts resides in the United Kingdom. She is a citizen of Singapore. She is the wife of Dr. Wright. Estimated time for direct and cross-examination: 1/2 day (by plaintiffs), 1/2 day (by defense).

**22. Jamie Wilson.** Jamie Wilson resides in Queensland, Australia. He is the founder of Your Digital File and was formerly involved with Hotwire Preemptive Intelligence Propriety Limited and Coin Exchange Proprietary Limited in Australia. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1 hour (by defense). By designation only.

**23. Dr. Craig Wright.** Defendant Dr. Wright resides in London, United Kingdom. He is currently the Chief Scientist at nChain in London. Dr. Wright is a former employee at BDO

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<sup>2</sup> Mr. Eisner was designated as the corporate representative for W&K to appear at deposition on the topics requested by defendant. He is not necessarily W&K’s corporate representative at trial. Defendant objects to the inclusion of undisclosed and unidentified individuals to testify on behalf of W&K because it violates the trial order, which requires the parties to provide the “full name of the witness and succinct identifying information, such as area of residence or employment affiliation, to help the prospective jurors determine whether they recognize a potential witness.” Trial Order [D.E. 476] § 1(B). Defendant is also unaware of any topics of examination that plaintiffs propose, and even if plaintiffs had provided those topics to defendant, they are already likely covered in defendant’s Rule 30(b)(6) topics.

in Australia. Estimated time for direct and cross-examination: 1 day (by plaintiffs), 1 day (by defense).

- 24. Lynn Wright.** Lynn Wright resides in New South Wales, Australia. She is Dr. Wright's ex-wife and a citizen of Canada and Australia. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1.5 hours (by defense). By designation only.

## **B. EXPERT WITNESSES**

- 1. Andreas Antonopoulos.** Andreas Antonopoulos resides in Laramie, Wyoming. He has worked in the Bitcoin and Open Blockchain industry since 2012. Mr. Antonopoulos is a teaching fellow at the University of Nicosia and also works for the Chicago Mercantile Exchange. Estimated Time for direct and cross-examination: 3 hours (by plaintiffs), 3 hours (by defense).
- 2. Stefan Boedeker.** Stefan Boedeker resides in California. He is a managing director at Berkeley Research Group where he focuses on the application of economic, statistical, and financial models. He holds a Master's degree in economics from the University of California, San Diego, and a Master's degree in statistics from University of Dortmund in Germany. Estimated Time for direct and cross-examination: 1.5 hours (by plaintiffs), 3 hours (by defense).
- 3. Nicholas J. Chambers.** Nicholas Chambers resides in Washington, D.C. He is a Senior Vice President in the Investigations, Dispute and Risks practice at AlixPartners, LLP in Washington, D.C. He holds a Bachelor of Science in Computer Engineering from the University of Southern California. Prior to AlixPartners, he was employed by Navigant, in the Disputes and Investigation practice, headquartered in Chicago, Illinois. Estimated time for direct and cross-examination: 2.5 hours (by plaintiffs), 5 hours (by defense).

4. **Dr. William S. Choi.** William Choi resides in Lafayette, California. He is a Managing Director at AlixPartners, LLC in San Francisco, California. He is an economist who received his Bachelor of Science from the University of California, Riverside, and his Master's and Ph.D. degrees in economics from Duke University. He has also taught courses at UCLA and Duke. He previously worked at Intecap, Inc. and Econ One Research, Inc. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 4 hours (by defense).
5. **Dr. Matthew Edman.** Matthew Edman resides in New York. He is Director in the Cyber Security & Investigations practice at Berkley Research Group ("BRG") in New York, NY. Prior to joining BRG, he was a Lead Cyber Security Engineer at the MITRE Corporation. Estimated Time for direct and cross-examination: 5 hours (by plaintiff), 4 hours (by defense).
6. **Dr. William G. Eggington.** William Eggington resides in the Provo, Utah area and was a professor of English Language and Linguistics at Brigham Young University in Utah. He received his Ph.D. and Master's degrees in linguistics from University of Southern California. Estimated time for direct and cross-examination: 1.5 hours (by plaintiffs), 3 hours (by defense).
7. **Dr. Ami Klin.** Ami Klin resides in Atlanta, Georgia. He is the director of the Marcus Autism Center, and Chief of Autism, Children's Healthcare of Atlanta, and the Georgia Research Alliance Eminent Scholar Professor and Chief of the Division of Autism and Related Disorders at Emory University School of Medicine, Department of Pediatrics. He also works at the Center for Translational Social Neuroscience at Emory University. He is the principal investigator of the National Institutes of Health Emory Autism Center of Excellence. He previously was the Harris Professor of Child Psychology and Psychiatry at the Yale Child Study Center, Yale University School of Medicine. He is a licensed clinical psychologist and received his graduate school training at the Medical Research Council,



University of London. Estimated time for direct and cross-examination: 3 hours (by plaintiffs), 4 hours (by defense).

8. **Dr. Robert Leonard.** Robert Leonard resides in Mill Neck, New York. He is a professor of linguistics at Hofstra University in New York. Estimated time for direct and cross-examination: 2.5 hours (by plaintiff), 2 hours (by defense).
9. **Dr. D. Stewart MacIntyre, Jr.** Dr. D. Stewart MacIntyre, Jr. resides in Miami-Dade County, Florida. He is an infectious disease specialist in private practice with privileges at Mercy Hospital in Miami, Florida. He has held positions at the University of Miami School of Medicine and administrative positions at Jackson Memorial Hospital, Mercy Hospital, Cedars Medical Center, the Veterans' Affairs Miami Medical Center, and the South Florida Medical Consortium for Infection Control, Inc. Estimated time for direct and cross-examination: 1.5 hours (by plaintiffs), 3 hours (by defense).
10. **Kevin E. Madura.** Kevin Madura resides in Potomac, Maryland, and is a Senior Vice President in the global Cybersecurity practice group at AlixPartners LLP in Washington, D.C. Before AlixPartners he was employed at International Business Machines (IBM) in the Federal consulting practice. He holds a Bachelor of Science in Computer Science from the University of Maryland and a Master's degree in Technology Management from Georgetown University. Estimated time for direct and cross-examination: 2 hours (by plaintiffs), 3 hours (by defense).
11. **William R. Nicholson.** William Nicholson resides in the Jacksonville, Florida area and is a Principal, Partner and Chief Compliance Officer of Heritage Capital Group in Jacksonville, Florida. He previously worked at Barnett Mortgage Trust and Barnett Mortgage, Greenburg Savings, PNC Bank, Barnett Bank of Florida, Nations Bank, Bank of America Securities, and Chatsworth Securities. Mr. Nicholson received his MBA from the University of North

Carolina, and his B.A. from Wesleyan University. Estimated time for direct and cross-examination: 1 hour (by plaintiffs), 1 hour (by defense).

Dated August 31, 2021

Respectfully submitted,

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*Counsel to Plaintiffs Ira Kleiman as Personal Representative of the Estate of David Kleiman and W&K Info Defense Research, LLC.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 31, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Velvel Freedman  
VELVEL (DEVIN) FREEDMAN