



Amended Claim Form under CPR Rule 17.1(1)

dated 28 November 2022

Re-Amended Claim Form by Order of

The Honourable Mr Justice Mellor dated

7 February 2023

Re-Amended Claim Form

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

In the **HIGH COURT OF JUSTICE**
BUSINESS AND PROPERTY COURTS
OF ENGLAND AND WALES
INTELLECTUAL PROPERTY LIST
(ChD)

Fee Account no.

Help with Fees –
Ref no. (if applicable)

H W F -

IL-2022-000069

For court use only

Claim no.

Issue date

SEAL

Claimant(s) name(s) and address(es) including postcode

- (1) Dr Craig Steven Wright of [REDACTED]
- (2) Wright International Investments Ltd of Room B11, First Floor, Providence Complex, Providence, Mahe, Seychelles. (Please note Seychelles does not use postcodes).
- (3) Wright International Investments UK Ltd of Halton House, 20-23 Holborn, London, EC1N 2JD, United Kingdom.

Defendant(s) name and address(es) including postcode

- (1) BTC Core (a partnership of entities and individuals including the second to twenty-sixth defendants, Bitcoin Core Code Signing LLC and/or Bitcoincoire.org LLC) of ~~[address-unknown]~~ e/o Harvard Business Services Inc. 16192 Coastal Highway, Lewes, Sussex, Delaware, 19958
- (2) Wladimir Jasper Van Dder Laan of [REDACTED]
- (3) Jonas Schnelli of [REDACTED]
- (4) Pieter Wuille of [REDACTED]
- (5) Marco Patrick Falke of [REDACTED]
- (6) Samuel Dobson of [REDACTED]
- (7) Michael Rohan Ford of [REDACTED]
- (8) Cory Fields of [REDACTED]
- (9) [REDACTED] 'Luke Dashjr' of [REDACTED]
- (10) Matthew Gregory Corallo of [REDACTED]
- (11) Peter Todd of [REDACTED]
- (12) Gregory Fulton Maxwell of [REDACTED]
- (13) Eric Lombrozo of [REDACTED]
- (14) John Newbury Newbery of [REDACTED]
- ~~(15) Martin Zumsande of [REDACTED]~~
- ~~(16) (15) Peter John Bushnell of [REDACTED]~~
- ~~(17) (16) Block, Inc. of 1455 Market Street Suite 600 San Francisco, CA 94103 United States of America.~~
- ~~(18) (17) Spiral BTC, Inc of [address-unknown]. 1455 Market Street, Suite 600, San Francisco, California, 94103, United States of America.~~
- ~~(19) (18) Squareup Europe Ltd of 6th Floor One London Wall, London, EC2Y 5EB.~~
- ~~(20) (19) Blockstream Corporation Inc. of 205-3531 Uptown Blvd, Victoria, Vancouver Island, BC, Canada V8Z 0B9.~~
- ~~(21) (20) Chaincode Labs, Inc of 450 Lexington Avenue, Fl 38, New York, NY, United States of America.~~
- ~~(22) (21) Coinbase Global Inc. of (e/o the Corporation Trust Company) Corporation Trust Centre, 1209 Orange Street, Wilmington, New Castle, Delaware, 19801, United States of America.~~
- ~~(23) (22) CB Payments, Ltd of 5 Fleet Place, London, EC4M 7RD.~~
- ~~(24) (23) Coinbase Europe Limited of 70 Sir John Rogerson's Quay, Dublin, D02 R296, Ireland.~~

~~(25) (24) Coinbase Inc. of (e/o the Corporation Trust Company) Corporation Trust Centre, 1209 Orange Street, Wilmington, New Castle, Delaware, 19801, United States of America 430 California Street, San Francisco, CA 94104, United States of America~~
(26) (25) Crypto Open Patent Alliance of 3000 El Camino Real, Building Two, Suite 900, Palo Alto, CA 94306, United States of America
(26) Squareup International Limited of 70 Sir John Rogerson's Quay, Dublin 2, Ireland.

Brief details of claim

Please see the attached rider.

Value

The Claimants estimate the financial value of this claim could be in the hundreds of billions of pounds. The Claimants will seek a split trial of liability and quantum, with disclosure after the liability phase to enable them to make an informed election between its remedies of an account of profits or an inquiry as to damages. The Claimants undertake to and will pay the appropriate court fee for the financial relief that they will seek through the later inquiry as to damages (or account of profits, albeit the Claimants understand that such does not amount to monetary relief) upon the commencement of such inquiry (or account).

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Defendant's
name and
address for
service including
postcode

As above

£

Amount claimed	To be assessed
Court fee	569.00
Legal representative's costs	To be assessed
Total amount	-

Claim No.

Does, or will, your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Particulars of Claim (to follow)

Statement of truth - First Claimant

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

☒ I believe that the facts stated in this Re-Amended Claim Form and any attached sheets are true.

☐ The claimant believes that the facts stated in this claim form and any attached sheets are true. I am authorised by the claimant to sign this statement.

Signature



☒ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

14

02

2023

Full name

Dr Craig Steven Wright

Name of claimant's legal representative's firm

Harcus Parker Limited

If signing on behalf of firm or company give position or office held

Statement of truth - Second Claimant

The Second Claimant understands that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

☐ I believe that the facts stated in this claim form and any attached sheets are true.

☒ The Second Claimant believes that the facts stated in this Re-Amended Claim Form and any attached sheets are true. I am authorised by the Second Claimant to sign this statement.

Signature



☒ For and on behalf of Wright International Investments Ltd, acting by a corporate director, Equator Consultants AG (acting by a Director, Dr Craig Steven Wright)

☐ Litigation friend (where claimant is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

14

02

2023

Full name

Dr Craig Steven Wright

Name of Second Claimant's legal representative's firm

Harcus Parker Limited

If signing on behalf of firm or company give position or office held

Director of Equator Consultants AG (a corporate director of Wright International Investments Ltd)

Statement of truth - Third Claimant

The Third Claimant understands that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- ☐ I believe that the facts stated in this claim form and any attached sheets are true.
- ☒ The Third Claimant believes that the facts stated in this Re-Amended Claim Form and any attached sheets are true. I am authorised by the Third Claimant to sign this statement.

Signature



- ☒ ~~Claimant For an on behalf of Wright International Investments UK Ltd, acting by a corporate director, Equator Consultants AG (acting by a Director, Dr Craig Steven Wright)~~
- ☐ Litigation friend (where claimant is a child or protected party)
- ☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

14

02

2023

Full name

Dr Craig Steven Wright

Name of Second Claimant's legal representative's firm

Harcus Parker Limited

If signing on behalf of firm or company give position or office held

Director of ~~Equator Consultants AG (a corporate director of Wright International Investments UK Ltd)~~

CLAIM FORM RIDER

1. The 1st defendant is a global partnership consisting of entities and individuals including the 2nd to 26th defendants acting pursuant to a common design to do the acts complained of below, alternatively the defendants are a global partnership acting pursuant to a common design to do such acts.
2. The 2nd to ~~16~~ 15th defendants (~~(the ‘BTC Developers’)~~) are ~~individuals~~ persons who, individually and collectively, acting in partnership with each other pursuant to a common design, are ~~responsible involved in for~~ the development, promotion and/or making available for download and use software which operates the electronic cash system promoted as ‘Bitcoin’ and ‘Bitcoin Core’ by reference to the ticker ‘BTC’ (the ‘BTC System’) and the electronic cash (‘BTC’) implemented by such system.
3. [REDACTED]
[REDACTED]
[REDACTED] The 18th
and 22nd defendants are companies incorporated under the laws of England and Wales. The 16th, 17th, 19th to 21st and 23rd to 26th defendants are companies incorporated outside the United Kingdom.
4. The ~~176~~th to 24th and 26th defendants are companies whose business includes funding and directing the activities of the ~~BTC Developers~~ 2nd to 15th, 18th and 22nd defendants in relation to the activities referred to in paragraph 2 above and who, directly or via subsidiary or closely associated companies, participate in and promote the operation and use of the BTC System and the trading and exchange of BTC in the United Kingdom and elsewhere in the world (the ‘BTC Funders’). The 25th Defendant is a membership organisation that takes an active interest in and promotes use of the BTC System.
5. In January 2009 the First Claimant (using the pseudonym ‘Satoshi Nakamoto’) launched an electronic cash system under the name

‘Bitcoin’) (the ‘**Bitcoin System**’). He had previously described the system in a document known as the Bitcoin ‘White Paper’. ‘**Bitcoin**’ is the name of the electronic cash made available by such system. The Bitcoin System utilises a blockchain (the ‘**Bitcoin Blockchain**’) which was made available on following the launch of the system.

Passing-off

- ~~6. — The use of the designations ‘Bitcoin’ and ‘BTC’ in relation to the BTC System and BTC by traders in the course of trade in the United Kingdom (‘BTC Traders’) constitutes passing-off actionable at the suit of the claimants.~~
- ~~7. — Such passing-off arises having regard to (amongst other things) the fact that the BTC System and BTC do not have the characteristics of the Bitcoin System.~~
- ~~8. — The claimants are bringing proceedings in the United Kingdom seeking to restrain acts of passing-off by certain BTC Traders and other appropriate remedies for passing off.~~
- ~~9. — The work and have worked in partnership with each other and the BTC Funders pursuant to a common design to promote, enable and facilitate the operation of the BTC System and the trading, exchange and other use of BTC in the United Kingdom. Further, the act and have acted pursuant to a common design with each other, with BTC Traders and with the BTC Funders to do such acts.~~
- ~~10. — Moreover, by funding and assisting the and by promoting the BTC System and BTC in the United Kingdom the BTC Funders act and have acted in partnership with and pursuant to common designs with the and pursuant to common designs with the BTC Traders to do such acts.~~
- ~~11. — Accordingly, each of the defendants is jointly liable with each other and the BTC Traders for acts of passing-off by BTC Traders in the United Kingdom.~~

The Bitcoin and BTC Blockchains

12. The Third Claimant is the assignee of, alternatively the First Claimant, alternatively the Second Claimant is the owner of a database right (within the meaning of the Copyright and Rights in Databases Regulations 1997) which subsists in all or at least a relevant part of the Bitcoin Blockchain up to and including block 478,558.
- ~~13. The Bitcoin Blockchain comprises blocks of data, each block being organised and arranged in a particular original and creative format (the 'Bitcoin File Format'). The First Claimant is the author of the Bitcoin File Format, which is an original literary work in respect of which copyright subsists. The Third Claimant is the assignee of, alternatively the First Claimant, alternatively the Second Claimant is the owner of that copyright.~~
- ~~14. Further, the Bitcoin Blockchain as a whole including the part of it up to block 478,558 is also an original literary work in which copyright subsists. The First Claimant is author of the Bitcoin Blockchain and the Claimant is the assignee of, alternatively the First Claimant, alternatively the Second Claimant owns the copyright subsisting in it.~~
15. Block 230,009 in the Bitcoin Blockchain was mined on 6 April 2013 and contains a copy of the White Paper in electronic form.
16. The White Paper is an original literary work. Copyright subsists in it. The First Claimant is the owner of that copyright.
17. The BTC System utilises a blockchain (the '**BTC Blockchain**'). The BTC Blockchain is an exact replica of the Bitcoin Blockchain up to block 478,558.
18. There are persons [REDACTED] [REDACTED] who are involved in the running and use of the BTC System by operating computer systems which participate in the peer-to-peer network comprising the BTC System and which read from, write to and copy all and parts of the BTC Blockchain. Such persons (**'BTC Participants'**) have, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] without the consent of the Claimants extracted and re-utilised all and substantial parts of the Bitcoin Blockchain

and have made copies of substantial parts of the Bitcoin Blockchain (including block 230,009 containing the White Paper) in the course of their activities in relation to the BTC Blockchain. The Twenty-Fifth Defendant and/or its members and/or by a common design between them also performed the same acts including in the United Kingdom. Further, the 2nd to 13th defendants and BTC Funders make the BTC Software available to nodes and potential nodes in the UK with the inevitable consequences such nodes or potential nodes would infringe the Claimants' database right and copyright, such that the 2nd to 13th defendants and BTC Funders are primarily liable, and/or jointly liable with those users for the same.

19. Each of the Defendants (save the Twenty-Fifth Defendant) has acted pursuant to a common design with each other to cause enable and assist the BTC System to operate in the United Kingdom and elsewhere, and in particular to cause enable and assist the [REDACTED] Defendants to undertake the activities referred to above in the United Kingdom. Each of the Defendants (save the Twenty-Fifth Defendant) is jointly liable with each other ~~and each BTC Participant~~ for infringement of—

- (1) the Claimants' database right in the Bitcoin Blockchain and/or relevant constituent parts of the same;
- ~~(2) the Claimants' copyright in the Bitcoin File Format.~~
- ~~(3) the Claimants' copyright in the Bitcoin Blockchain up to block 468,558; and~~
- (4) the First Claimant's copyright which subsists in the White Paper.

Relief

20. The claimants seek appropriate remedies for ~~passing off, and~~ infringement of database right and copyright against each of the defendants including ~~(1) an injunction restraining each of the defendants from passing off the BTC System and BTC as or for the Bitcoin System and Bitcoin or as a system and electronic cash having the characteristics of the~~

~~Bitcoin System and Bitcoin~~ (2) (1) an injunction restraining the defendants from infringing the claimants' database right in the Bitcoin Database; ~~copyright in the Bitcoin File Format, copyright in the Bitcoin Database~~ and copyright in the Bitcoin White Paper (3) (2) an injunction restraining each of the defendants from procuring, causing, enabling, assisting or acting pursuant to a common design with others to do any of such acts (4) (3) declarations as to the subsistence of database right and copyright, and their ownership by the relevant Claimant (4) an inquiry as to damages or an account of profits for ~~passing-off~~ infringement of database right and infringement of copyright (5) interest pursuant to section 35A of the Senior Courts Act 1981 and in the inherent jurisdiction of the court (6) an order for the dissemination and publication of any judgment or order made in this case at the expense of the defendants (7) costs and interest on costs (8) such further or other relief as may be appropriate.