

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

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

Plaintiffs,

v.

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

CRAIG WRIGHT,

Defendant.

**DR. CRAIG WRIGHT'S MOTION FOR AN ENLARGEMENT OF TIME
TO COMPLY WITH JUDGE REINHART'S ORDER [D.E. 166]**

Dr. Wright respectfully requests a ten-day extension of time to respond to Judge Reinhart's order regarding Dr. Wright's motion regarding production of a list of the public addresses of his bitcoin as of December 31, 2013 (the "Order") [D.E. 166]. In support of this request, Dr. Wright states as follows:

1. On May 3, 2019, Judge Reinhart issued an order requiring Dr. Wright to do the following:
 - a. on or before May 8, 2019, provide to Plaintiffs a sworn declaration identifying the name and location of the blind trust, the name and contact information for the current trustee and any past trustees, and the names and contact information of any current or past beneficiaries;
 - b. on or before May 9, 2019, at 5:00 p.m. Eastern time, produce to Plaintiffs a copy of any and all documents relating to the formation, administration, and operation of the blind trust. The production shall be accompanied by a sworn declaration of authenticity; and

c. on or before May 15, 2019, at 5:00 p.m. Eastern time, produce all transactional records of the blind trust, including but not limited to any records reflecting the transfer of bitcoin into the blind trust in or about 2011. The production shall be accompanied by a sworn declaration of authenticity.

2. The information required under the Order relate to complex trust structures governed by foreign law.

3. Dr. Wright requests additional time to prepare and execute the sworn declaration regarding those complex trusts because they were structured in such a way that he does have direct knowledge of some of the required information, such as the names of the trustees (past and present) and does not have direct access to all information required to be produced.

4. To obtain relevant information will require Dr. Wright and his counsel to reach out to individuals and entities in various foreign jurisdictions. This obviously will require coordination across multiple times zones.

5. In order to facilitate the efficient collection of the relevant information, counsel for Dr. Wright is flying to the United Kingdom tonight, May 6, 2019, but will not arrive in the United Kingdom until May 7, 2019.

6. For the forgoing reasons, Dr. Wright respectfully requests that the Court enlarge the time to comply with Judge Reinhart's order by ten days as follows:

a. on or before May 18, 2019, provide to Plaintiffs a sworn declaration identifying the name and location of the blind trust, the name and contact information for the current trustee and any past trustees, and the names and contact information of any current or past beneficiaries;

b. on or before May 19, 2019, at 5:00 p.m. Eastern time, produce to Plaintiffs a copy of any and all documents relating to the formation, administration, and

operation of the blind trust. The production shall be accompanied by a sworn declaration of authenticity; and

- c. on or before May 25, 2019, at 5:00 p.m. Eastern time, produce all transactional records of the blind trust, including but not limited to any records reflecting the transfer of bitcoin into the blind trust in or about 2011.

The production shall be accompanied by a sworn declaration of authenticity.

7. This motion is brought in good faith and not for the purpose of delay.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I certify that counsel for the movant has conferred with all parties who may be affected by the relief sought in this motion by electronic mail. Plaintiffs' counsel does not consent the enlargement of time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 6, 2019, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that this document is being served today on all counsel of record either by transmission of Notices of Electronic Filing generated by CM/ECF or by U.S. Mail.

/s/Andres Rivero
ANDRES RIVERO