



ONTIER

Attention:

Square Crypto
Square Inc.
Squareup Europe Ltd

By Twitter: @Sqcrypto; @Square; @SquareUK

21 January 2021

Our Ref: SC/WRI2.24

Dear Sir,

**Our Client: Dr Craig Wright
Notice of Infringement of Copyright**

We act for Dr Craig Wright, who is the author of, and owner of the copyrights throughout the world in, a literary work entitled “Bitcoin: A Peer-to-Peer Electronic Cash System” – commonly known in the Bitcoin and cryptocurrency world as “the White Paper”. Dr Wright is the individual behind the pseudonym ‘*Satoshi Nakamoto*’ and is the creator of Bitcoin.

We strongly suggest that you take legal advice upon the contents of this letter, which is written in compliance with the Pre-Action Protocol applicable to intellectual property claims in the High Court of England and Wales. The Protocol can be viewed at https://www.justice.gov.uk/courts/procedure-rules/civil/rules/pd_pre-action_conduct.

We are writing to you via your Twitter account since we do not currently have any other contact details for you. In order to facilitate future communications, we require you to provide us with: (a) an active email address; and (b) your postal address. Should you refuse to provide these details, our client will take steps to ascertain them by other means, including, if necessary, the making of applications to court to compel disclosure of this information by you and/or third parties.

Dr Wright originally released the White Paper pseudonymously under the name Satoshi Nakamoto, on 31 October 2008. At the time, our client wished to preserve the confidentiality of his identity as the author of the White Paper. As you may know, in December 2015, our client’s identity and his authorship of the White Paper was revealed to the world against his will. In May 2016, he publicly confirmed that he authored the White Paper and created Bitcoin.

Dr Wright has decided that it is time to enforce his copyright in the White Paper.

We understand that you are the controller of the website www.squarecrypto.org, which (among other cryptocurrency activities) makes the White Paper available for download to the public in the UK and throughout the world. The purpose of this letter is to give you notice that our client requires you to stop making the White Paper available, and to give an undertaking not to do so in future.

Provided that your response to this letter indicates that you are prepared in principle to provide the undertaking referred to above, our client is willing to waive any claim to financial relief for your past infringements, and to agree to your having a reasonable time to make the necessary arrangements to comply with the undertaking requested. In principle, our client considers that a period of one month from the date of this letter should be sufficient, but our client is willing to consider alternative proposals.

We consider that this is a straightforward copyright infringement claim, and accordingly would ask you to respond to this letter within 14 days, i.e. **by 4pm GMT on 4 February 2021.**

Failing that, our instructions are to issue proceedings without further notice, claiming an injunction, appropriate financial relief for your infringement of copyright in the White Paper – including additional damages having regard to the fact that your active infringements are deliberate and flagrant (see s. 97 of the Copyright Designs and Patents Act 1988), costs, and an order for the publication by you of appropriate notices on your website and advertisements of the result of the action.

We should add that our client, and others associated with him, have further rights relating to the Bitcoin technology and the Bitcoin name. It is their firm intention to enforce such rights in due course. The writing of this letter and any settlement or judgment relating to the infringement of our client’s copyright in the White Paper, are entirely without prejudice to the enforcement in due course of such further rights.

Please address future correspondence regarding this matter to [REDACTED] [REDACTED] [REDACTED] of this office.

We look forward to hearing from you shortly. In the meantime, our client’s rights remain fully reserved, without limitation.

Yours faithfully,

ONTIER LLP

ONTIER LLP