

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

**Case No. 18-cv-80176-BLOOM/Reinhart**

IRA KLEIMAN, as Personal Representative  
of the Estate of David Kleiman, and W&K  
INFO DEFENSE RESEARCH, LLC,

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

\_\_\_\_\_ /

**VERDICT FORM**

We, the jury, return the following verdict in this matter:

**Breach of Partnership**  
**(Asserted by the Estate of David Kleiman)**

**Question 1:**

Do you find that Craig Wright is liable to the Estate of David Kleiman for breach of partnership?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 1, please skip to Question 3.*

*If you answered "Yes" to Question 1, please continue to Question 2.*

**Question 2:**

What is the amount of damages you find was caused by Craig Wright's breach of partnership?

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 3.*

**Conversion**

**(Asserted by the Estate of David Kleiman and W&K Info Defense Research, LLC)**

**Question 3:**

Do you find that Craig Wright is liable to the Estate of David Kleiman and/or W&K Info Defense Research, LLC for conversion?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 3, please skip to Question 6.*

*If you answered "Yes" to Question 3, please continue to Question 4.*

**Question 4:**

If you answered "Yes" to Question 3, identify the Plaintiff(s) to whom Craig Wright is liable for conversion by placing an identifying mark (check or X) next to one (or both) of the following:

\_\_\_\_\_ Estate of David Kleiman

\_\_\_\_\_ W&K Info Defense Research, LLC

*Please answer Question 5.*

**Question 5:**

For each Plaintiff you checked yes to in Question 4, what is the amount of compensatory damages you find was caused by Craig Wright's conversion?

Estate of David Kleiman:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

W&K Info Defense Research, LLC:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 6.*

**Civil Theft**

**(Asserted by the Estate of David Kleiman and W&K Info Defense Research, LLC)**

**Question 6:**

Do you find that either the Estate of David Kleiman or W&K Info Defense Research, LLC has proven its claim for civil theft against Craig Wright by clear and convincing evidence?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 6, please skip to Question 9.*

*If you answered "Yes" to Question 6, please continue to Question 7.*

**Question 7:**

If you answered "Yes" to Question 6, identify which Plaintiff(s) has proven their claim of civil theft by placing an identifying mark (check or X) next to one (or both) of the following:

\_\_\_\_\_ Estate of David Kleiman

\_\_\_\_\_ W&K Info Defense Research, LLC

*Please answer Question 8.*

**Question 8:**

For each Plaintiff that you checked yes to in Question 7, what is the amount of compensatory damages you find was caused by Craig Wright's civil theft?

Estate of David Kleiman:

\$\_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$\_\_\_\_\_ (Provide numerical amount owed from intellectual property)

W&K Info Defense Research, LLC:

\$\_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$\_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 9.*

**Fraud**

**(Asserted by the Estate of David Kleiman and W&K Info Defense Research, LLC)**

**Question 9:**

Do you find that Craig Wright is liable to the Estate of David Kleiman and/or W&K Info Defense Research, LLC for fraud?

ANSWER YES OR NO \_\_\_\_\_

*If you answered “No” to Question 9, please skip to Question 12.*

*If you answered “Yes” to Question 9, please continue to Question 10.*

**Question 10:**

If you answered “Yes” to Question 9, identify which Plaintiff(s) were subjected to fraud by placing an identifying mark (check or X) next to one (or both) of the following:

\_\_\_\_\_ Estate of David Kleiman

\_\_\_\_\_ W&K Info Defense Research, LLC

*Please answer Question 11.*

**Question 11:**

If you answered “Yes” to Question 9, for each Plaintiff that you checked yes to in question 10, what is the amount of compensatory damages you find were caused by Craig Wright’s fraud?

Estate of David Kleiman:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

W&K Info Defense Research, LLC:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 12.*

**Constructive Fraud**

**(Asserted by the Estate of David Kleiman and W&K Info Defense Research, LLC)**

**Question 12:**

Do you find that Craig Wright is liable to the Estate of David Kleiman and/or W&K Info Defense Research, LLC for constructive fraud?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 12, please skip to Question 15.*

*If you answered "Yes" to Question 12, please continue to Question 13.*

**Question 13:**

If you answered "Yes" to Question 12, identify which Plaintiff(s) was subjected to constructive fraud by placing an identifying mark (check or X) next to one (or both) of the following:

\_\_\_\_\_ Estate of David Kleiman

\_\_\_\_\_ W&K Info Defense Research, LLC

*Please answer Question 14.*

**Question 14:**

If you answered "Yes" to Question 12, for each Plaintiff that you checked yes to in Question 13, what is the amount of compensatory damages you find were caused by Craig Wright's constructive fraud?

Estate of David Kleiman:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

W&K Info Defense Research, LLC:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 15.*

**Breach of Fiduciary Duty**  
**(Asserted by W&K Info Defense Research, LLC)**

**Question 15:**

Do you find that Craig Wright is liable to W&K Info Defense Research, LLC for breach of fiduciary duty?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 15, please skip to Question 17.*

*If you answered "Yes" to Question 15, please continue to Question 16.*

**Question 16:**

If yes, what is the amount of compensatory damages you find were caused to W&K Info Defense Research, LLC by Craig Wright's breach of fiduciary duty?

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 17.*

**Unjust Enrichment**  
**(Asserted by the Estate of David Kleiman and W&K Info Defense Research, LLC)**

**Question 17:**

*If you found for the Estate of David Kleiman on its claim for breach of partnership in Question 1, you should skip the next three questions with respect to the Estate of David Kleiman. Please answer them with respect to W&K Info Defense Research, LLC.*

Do you find that Craig Wright is liable to the Estate of David Kleiman and/or W&K Info Defense Research, LLC for unjust enrichment?

ANSWER YES OR NO \_\_\_\_\_

*If you answered "No" to Question 17, please skip to Question 20.*

*If you answered "Yes" to Question 17, please continue to Question 18.*

**Question 18:**

If you answered “Yes” to question 17, identify the Plaintiff(s) to whom Craig Wright is liable for unjust enrichment by placing an identifying mark (check or X) next to one (or both) of the following:

\_\_\_\_\_ Estate of David Kleiman

\_\_\_\_\_ W&K Info Defense Research, LLC

*Please answer Question 19.*

**Question 19:**

If you answered “Yes” to question 17, for each Plaintiff that you checked yes to in question 18, what is the amount of compensatory damages you find were caused by Craig Wright’s unjust enrichment?

Estate of David Kleiman:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

W&K Info Defense Research, LLC:

\$ \_\_\_\_\_ (Provide numerical amount owed from bitcoin)

\$ \_\_\_\_\_ (Provide numerical amount owed from intellectual property)

*Please answer Question 20.*

**Amount of Bitcoin**

**Question 20:**

If you found for Plaintiffs Estate of David Kleiman and/or W&K Info Defense Research, LLC on some or all of the claims above, what number of bitcoin do you find belongs to:

The Estate of David Kleiman \_\_\_\_\_ (Provide a number of bitcoin)

W&K Info Defense Research, LLC? \_\_\_\_\_ (Provide a number of bitcoin)

*Please answer Question 21.*

**Affirmative Defense of Statute of Limitations**  
**(Asserted by Dr. Craig Wright as to the Estate’s Claims)**

**Question 21:**

Do you find that any of the following claims by the Estate of David Kleiman are barred by the statute of limitations?

- Breach of Partnership:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Conversion:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Unjust Enrichment:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Fraud:                            \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Constructive Fraud:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred

*Please answer Question 22.*

**Affirmative Defense of Statute of Limitations**  
**(Asserted by Dr. Craig Wright as the W&K’s Claims)**

**Question 22:**

Do you find that any of the following claims by W&K Info Defense Research, LLC are barred the statute of limitations?

- Conversion:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Unjust Enrichment:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Fraud:                            \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Constructive Fraud:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Breach of Fiduciary Duty:   \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred

*Please answer Question 23.*



**Affirmative Defense of Laches**  
**(Asserted by Dr. Craig Wright as to the Estate’s Claims)**

**Question 23:**

Do you find that any of the following claims by the Estate of David Kleiman are barred by laches?

- Breach of Partnership:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Conversion:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Unjust Enrichment:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Fraud:                            \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Constructive Fraud:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Civil Theft:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred

*Please answer Question 24:*

**Affirmative Defense of Laches**  
**(Asserted by Dr. Craig Wright as to W&K’s Claims)**

**Question 24:**

Do you find that any of the following claims by W&K Info Defense Research, LLC are barred by laches?

- Conversion:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Unjust Enrichment:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Fraud:                            \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Constructive Fraud:        \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Breach of Fiduciary Duty: \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred
- Civil Theft:                    \_\_\_\_\_ Barred        \_\_\_\_\_ Not Barred

*Please answer Question 25.*

**PUNITIVE DAMAGES**

**Question 25:**

*If you found in favor of the Estate of David Kleiman and/or W&K Info Defense Research, LLC on their conversion, fraud, or constructive fraud claims, then you must decide whether punitive damages are appropriate and, if so, determine the amount of punitive damages to award to the Estate of David Kleiman and/or W&K Info Defense Research, LLC.*

Do you find that Craig Wright is liable to the Estate of David Kleiman on claims asserted by the Estate of David Kleiman for punitive damages? If the answer is “yes,” set forth the amount.

\$\_\_\_\_\_ (Provide numerical amount)

Do you find that Craig Wright is liable to W&K Info Defense Research, LLC on claims asserted by W&K Info Defense Research, LLC for punitive damages? If the answer is “yes,” set forth the amount.

\$\_\_\_\_\_ (Provide numerical amount)

*Please have the foreperson sign and date the verdict form.*

SO SAY WE ALL this \_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Foreperson