

**From:** Susan Tull stull@raklaw.com  
**Subject:** Re: HFT v. Citadel: Citadel Securities' Responses to Written Discovery  
**Date:** March 2, 2026 at 9:52 PM  
**To:** Taylor Kelson taylor.kelson@bartlitbeck.com, Rak Hft rak\_hft@raklaw.com, Joshua Scheufler jscheufler@raklaw.com  
**Cc:** Mailing List HFT hft@bartlitbeck.com

ST

Taylor,

We are still waiting for Citadel's draft proposed supplemental protective order. We note that HFT's final infringement contentions are due on March 25th and we now have less than one month to review Citadel's source code and draft such contentions. Citadel has been aware of HFT's request for source code for some time now and still has failed to make such code available, provide a date for production, or even raise the issue of a supplemental protective order until serving its discovery responses. Citadel cannot unilaterally withhold discovery; please provide Citadel's draft proposed supplemental protective order tomorrow.

Regards,  
Susan

**Susan Tull**  
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**From:** Taylor Kelson <taylor.kelson@bartlitbeck.com>  
**Date:** Monday, February 23, 2026 at 3:55 PM  
**To:** Rak Hft <rak\_hft@raklaw.com>, Susan Tull <stull@raklaw.com>, Joshua Scheufler <jscheufler@raklaw.com>  
**Cc:** Mailing List HFT <hft@bartlitbeck.com>  
**Subject:** HFT v. Citadel: Citadel Securities' Responses to Written Discovery

Counsel —

Please find attached for service: (1) Citadel Securities' Responses to HFT's First Set of RFPs; (2) Citadel Securities' Responses to HFT's First Set of RFAs; and (3) Citadel Securities' Responses to HFT's First Set of Interrogatories.

Citadel Securities objects to certain of HFT's RFPs on the basis that they seek production of documents including Source Code as that term will be defined in a supplemental protective order. To the extent that Citadel Securities makes any of its proprietary and highly confidential Source Code available for inspection, it will do so only pursuant to the terms of a supplemental protective order that provides sufficient protection of the security and confidentiality of Citadel Securities' Source Code and

other documents.

We are preparing a draft proposed supplemental protective order that we expect to circulate this week.

Thanks,  
Taylor

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**BartlitBeck**<sub>LLP</sub>

Taylor Kelson

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