

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HFT SOLUTIONS, LLC,

Plaintiff,

v.

CITADEL SECURITIES LLC,

Plaintiff.

C.A. No. 1:24-CV-13213

JURY TRIAL DEMANDED

**CITADEL SECURITIES LLC’S OBJECTIONS AND RESPONSES TO PLAINTIFF’S
FIRST SET OF REQUESTS FOR PRODUCTION (Nos. 1–55) TO DEFENDANT**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Citadel Securities LLC (“Citadel Securities”) hereby responds to the First Set of Requests for Production (Nos. 1–55) to Plaintiff propounded by Plaintiff HFT Solutions, LLC (“HFT”).

GENERAL OBJECTIONS

1. As described for each request below, Citadel Securities objects that Plaintiff’s requests fail to “describe with reasonable particularity each item or category of items” Plaintiff seeks as required by the Federal Rules of Civil Procedure. Fed. R. Civ. P. 34(a). Instead, Plaintiff’s requests are in general overbroad, vague, ambiguous, and/or not proportional to the needs of the case. For example, many of Plaintiff’s requests are not limited by date range or custodian. Where Citadel Securities has been able to identify the categories of documents or other materials that it will produce in response to the overbroad, vague, or ambiguous requests, it has done so. In some instances, however, the requests are so broad that it is not possible for Citadel Securities to impose workable limits on the scope of production. In these circumstances, Citadel Securities will produce responsive documents (if at all) only as such documents are located through the use of search

terms, custodians, file types, and data locations that are limited and reasonably targeted to identify responsive, relevant, non-privileged materials.

2. Citadel Securities objects to each and every Request, and to Plaintiff's "Definitions" and "Instructions," to the extent they purport to impose additional burdens or duties on Citadel Securities that exceed the scope of reasonable and permissible discovery under the Federal Rules of Civil Procedure, the Local Rules of the Northern District of Illinois, the Court's orders, or the parties' agreements.

3. In particular, Citadel Securities objects to Plaintiff's definition of "Accused Products" because it purports to include any "FPGA systems and platforms made, used, offered for sale, sold, or imported by [Citadel Securities] in the United States" without limitation to any specific, identifiable products. This definition is vague, ambiguous, and overbroad and unduly burdensome. In responding to Requests that use the term "Accused Products," Citadel Securities will respond only regarding the Bittware XUP-VV8 and AMD Alveo UL3524 or UL3422 boards that HFT has specifically identified as Accused Products.

4. Citadel Securities objects to each and every Request to the extent they are overbroad, unduly burdensome, vague, and/or ambiguous.

5. Citadel Securities objects to each and every Request to the extent they call for production of documents or information protected by the attorney-client privilege, the attorney work-product doctrine, and/or any other applicable law, privilege, or immunity. Nothing contained herein is intended to be or should be construed as a waiver of the attorney-client privilege, the attorney work-product doctrine, and/or any other applicable law, privilege or immunity. Nor shall Citadel Securities' production of any document in response to any of Plaintiff's Requests be used by Plaintiff to argue that Citadel Securities has waived any other privilege or right.

6. Citadel Securities objects to each and every Request to the extent they call for the production of confidential information protected by any law or regulation. Citadel Securities will not produce documents or information protected from production by law or regulation.

7. Citadel Securities objects to each and every Request to the extent they seek the confidential information of third parties that Citadel Securities is contractually or legally obligated to maintain as confidential. To the extent that Citadel Securities withholds documents on this basis, it will inform Plaintiff.

8. All documents produced shall bear confidentiality markings in accordance with the Protective Order in this Action, and shall be treated accordingly.

9. Citadel Securities objects to each and every Request to the extent they are overbroad, unduly burdensome, and/or not proportional to the needs of the case in view of Citadel Securities' costs to investigate, collect, and produce documents responsive to the Request weighed against the likely benefit and the proportional needs of the case.

10. Citadel Securities objects to each and every Request to the extent they seek information or documents already in Plaintiff's possession, custody, or control or available in the public domain. Such information or documents are as readily available to Plaintiff as they are to Citadel Securities.

11. Citadel Securities objects to each and every Request to the extent they seek information or documents that are not in the possession, custody, or control of Citadel Securities.

12. Citadel Securities objects to each and every Request to the extent they seek information or documents that are neither relevant to the issues in this litigation nor proportional to the needs of the case.

13. Citadel Securities objects to each and every Request to the extent they call for legal

conclusions or legal opinions.

14. Citadel Securities objects to each and every Request as overbroad or unduly burdensome to the extent they fail to specify a relevant or reasonable time period, and thus are not limited to events related to this litigation, relevant to any claim or defense, nor proportional to the needs of the case.

15. Citadel Securities' objection to any request, including any privilege objection, is not an admission that documents responsive to the request exist; it is merely a statement that if any such documents are found to exist, Citadel Securities is withholding them.

16. Citadel Securities' agreement to search for and produce documents responsive to any request is not an admission that documents responsive to the request exist; it is merely a statement that if any such documents are found to exist, Citadel Securities will produce them.

17. Where Citadel Securities has agreed to produce documents responsive to the requests below and has not indicated a separate timing for production, it will do so on a rolling basis.

18. Citadel Securities objects to each and every Request to the extent they call upon Citadel Securities to create documents that do not already exist. Unless expressly stated otherwise, Citadel Securities will only produce documents as they exist in the ordinary course of business. Citadel Securities' responses and objections to any Request are not an admission that documents responsive to the Request exist.

19. Citadel Securities provides the responses below without conceding the relevance or materiality of the subject matter of any request or response, and without prejudice to Citadel Securities' rights to object to further discovery, to object to the use of any document or response at trial or any other court proceeding, or to object to the admissibility of any additional proof on

the subject matter of any request or response at the time of trial.

20. Citadel Securities expressly reserves the right to amend and/or supplement its responses to Plaintiff's Requests for Production of Documents and Things during the course of discovery.

21. Citadel Securities incorporates by reference its objections to Plaintiff's First Set of Interrogatories.

22. Citadel Securities incorporates by reference its objections to Plaintiff's First Set of Requests for Admission.

RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Produce all documents and things relating to the Accused Products.

RESPONSE:

Citadel Securities objects to this request on the basis that it seeks documents or information protected by the attorney-client privilege or the work product doctrine. Privileged information or material responsive to this request will be withheld.

Citadel Securities objects that this request is overbroad at least because it is vague and ambiguous. It provides no description of what specific information Plaintiff seeks, making it impossible for Citadel Securities to propose a search for responsive documents that is proportional to the needs of this case. Citadel Securities objects that this request is overbroad and unduly burdensome. This request is not reasonably calculated to lead to the discovery of admissible evidence and imposes an undue burden on Citadel Securities that is disproportionate to any likely benefit. Specifically, the term "all documents and things relating to the Accused Products," without any limitation in time, custodian, subject matter, or relevance to the asserted patents, is overbroad and unduly burdensome. Citadel Securities objects to this request because it seeks "documents and

things relating to the Accused Products” with no limitation or restriction regarding relevance to the asserted patents, which have no relevance to any claim or defense of any party. Citadel Securities will not produce such documents or information. Citadel Securities objects to this request because it seeks production of documents or information that are not in Citadel Securities’ possession, custody, or control. Citadel Securities will not search for or produce documents or information that are in the possession, custody, or control of a third party.

Subject to these and its General Objections, Citadel Securities will produce relevant, non-privileged documents responsive to this request to the extent they exist; are in Citadel Securities possession, custody, or control; and can be located after a reasonable search.

REQUEST FOR PRODUCTION NO. 2:

Produce all documents identifying every FPGA system, board, hardware, and device—including, for example, vendor/brand name, product name, model name, part number, or serial number—that you have used in connection with any high-frequency or low-latency trading or market-data processing activity, including any market-making, latency-arbitrage, statistical arbitrage, tick-to-trade execution, pre-trade risk-management, or back-testing, since January 2021.

RESPONSE:

Citadel Securities objects to this request on the basis that it seeks documents or information protected by the attorney-client privilege or the work product doctrine. Privileged information or material responsive to this request will be withheld.

Citadel Securities objects that this request is overbroad and unduly burdensome. This request is not reasonably calculated to lead to the discovery of admissible evidence and imposes an undue burden on Citadel Securities that is disproportionate to any likely benefit. Specifically, the term “all documents identifying every FPGA system, board, hardware, and device” is overbroad and unduly burdensome. Citadel Securities objects to this request because it seeks “all documents identifying every FPGA system, board, hardware, and device” without any limitation or restriction regarding relevance to the asserted patents or the Accused Products, which have no

relevance to any claim or defense of any party. Citadel Securities will not produce such documents or information. Citadel Securities objects that this request is unreasonably cumulative and duplicative of HFT's other requests and other written discovery, and not proportional to the needs of the case considering that the burden and expense of the requested discovery outweighs its likely benefit.

Subject to these and its General Objections, Citadel Securities will not separately search for or produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 3:

Produce all documents describing the design and operation of each Accused Product, including schematics, PCB layouts, revision logs, bills of materials, block diagrams, functional specifications, interface-control documents, design files, HDL code, HDL files, source code, firmware, constraint files, scripts, build recipes, bitstreams, programming images, Verilog code, runtime parameter settings, and design reviews.

RESPONSE:

Citadel Securities objects that this request is overbroad and unduly burdensome. This request is not reasonably calculated to lead to the discovery of admissible evidence and imposes an undue burden on Citadel Securities that is disproportionate to any likely benefit. Specifically, the term "all documents describing the design and operation of each Accused Product" is overbroad and unduly burdensome. Citadel Securities objects to this request because it seeks "all documents describing the design and operation of each Accused Product," without any limitation or restriction regarding relevance to the asserted patents, which have no relevance to any claim or defense of any party. Citadel Securities will not produce such documents or information. Citadel Securities objects that this request is unreasonably cumulative and duplicative of HFT's other requests and other written discovery, and not proportional to the needs of the case considering that the burden and expense of the requested discovery outweighs its likely benefit. Citadel Securities objects to this request because it seeks production of documents or information that are not in

Citadel Securities' possession, custody, or control. Citadel Securities will not search for or produce documents or information that are in the possession, custody, or control of a third party.

Citadel Securities objects to this request because it seeks production of 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.

Subject to these and its General Objections, Citadel Securities will produce relevant, non-privileged documents responsive to this request to the extent they exist; are in Citadel Securities possession, custody, or control; and can be located after a reasonable search.

REQUEST FOR PRODUCTION NO. 4:

Produce documents sufficient to identify the custodians, repository locations, branch structures, commit histories, contributors, and access logs for the documents described in Request No. 3 above.

RESPONSE:

Citadel Securities objects that this request is overbroad and unduly burdensome. This request is not reasonably calculated to lead to the discovery of admissible evidence and imposes an undue burden on Citadel Securities that is disproportionate to any likely benefit. Specifically, the term "documents sufficient to identify the custodians, repository locations, branch structures, commit histories, contributors, and access logs" is overbroad and unduly burdensome.

Citadel Securities objects to this request because it seeks "documents sufficient to identify the custodians, repository locations, branch structures, commit histories, contributors, and access logs," without any limitation or restriction regarding relevance to the asserted patents, which have no relevance to any claim or defense of any party. Citadel Securities will not produce such documents or information. Citadel Securities objects that this request is unreasonably cumulative

and duplicative of HFT's other requests and other written discovery, and not proportional to the needs of the case considering that the burden and expense of the requested discovery outweighs its likely benefit. Citadel Securities objects to this request because it seeks production of documents or information that are not in Citadel Securities' possession, custody, or control. Citadel Securities will not search for or produce documents or information that are in the possession, custody, or control of a third party.

Citadel Securities objects to this request because it seeks production of 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.

Subject to these and its General Objections, Citadel Securities will conduct a reasonable search for and produce documents sufficient to identify the custodians of and contributors to any materials that Citadel Securities produces in response to HFT's RFP No. 3. Otherwise, Citadel Securities will not separately search for or produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 5:

Produce documents sufficient to show how the Accused Products interface with market-data feeds, trading engines, matching engines, order-management systems, pre-trade risk or compliance gateways, order-routing or exchange-gateway software, time-synchronization equipment (e.g., PTP grandmasters or boundary clocks), network switches or layer-1 latency switches, microwave or other low-latency transport links, and any other component of your trading infrastructure.

RESPONSE:

Citadel Securities objects to this request on the basis that it seeks documents or information protected by the attorney-client privilege or the work product doctrine. Privileged information or material responsive to this request will be withheld.

Dated: February 23, 2026

Respectfully submitted,

/s/ Meg E. Fasulo

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2026, a true and correct copy of the foregoing document was served via electronic mail upon counsel of record.

/s/ Meg E. Fasulo
Meg E. Fasulo