
From: Taylor Kelson
Sent: Tuesday, March 3, 2026 2:07 PM
To: Rak_hft@raklaw.com; Susan Tull; Joshua Scheufler
Cc: Mailing List HFT
Subject: Re: HFT v. Citadel: Citadel Securities' Responses to Written Discovery
Attachments: 20260303 - Protective Order (HFT v Citadel Securities).docx

Counsel —

Please find attached a proposed supplemental Protective Order in *HFT v. Citadel Securities*. Please let us know whether HFT agrees to jointly move the Court for entry of this supplemental Protective Order.

Thanks,
Taylor

BartlitBeck LLP

Taylor Kelson

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From: Taylor Kelson <taylor.kelson@bartlitbeck.com>
Date: Monday, February 23, 2026 at 16:55
To: Rak_hft@raklaw.com <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

BartlitBeck LLP

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