

Filed: March 5, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CITADEL SECURITIES LLC,

PETITIONER,

V.

HFT SOLUTIONS, LLC,

PATENT OWNER.

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Case No. IPR2026-00151

U.S. Patent No. 11,575,381

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**PETITIONER'S STIPULATION**

Petitioner Citadel Securities, LLC hereby stipulates that, if the Board institutes *inter partes* review in this proceeding, IPR2026-00151, Petitioner will not pursue in the parallel litigation, *HFT Solutions, LLC v. Citadel Securities, LLC*, No. 24-cv-13213 (N.D. Ill.), any grounds of invalidity arising from § 102 or § 103 involving only patent or printed publication art that could reasonably have been raised before the Board with respect to U.S. Pat. No. 11,575,381, including the same grounds in the Petition (Paper 2).

Dated: March 5, 2026

Respectfully Submitted,

Meg E. Fasulo

Meg E. Fasulo (Reg. No. 75,820)  
Lead Counsel for Petitioner

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above document was served on March 5, 2026 by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon the following attorney of record for Petitioner:

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Dated: March 5, 2026

Respectfully submitted,

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