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Re: *HFT Wireless, LLC v. Citadel Securities LLC* – Final Infringement Contentions

Dale,

I write regarding HFT’s Final Infringement Contentions in the above-referenced action, which were served on Citadel Securities on December 16, 2025 pursuant to N.D. Ill. Local Patent Rule 3.1. As set forth below, HFT’s Final Infringement Contentions are deficient under the Local Patent Rules of the Northern District of Illinois.

HFT’s Final Infringement Contentions identify three Accused Instrumentalities: the Bittware XUP-VV8, the AMD Alveo UL3524, and the AMD Alveo UL3422 FPGA boards. Despite identifying three distinct Accused Instrumentalities, HFT’s Final Infringement Contentions included only three claim charts, each of which purports to accuse all three Accused Instrumentalities of infringing one of the three asserted patents. *See* Final Infringement Contentions Exs. A–C. Rather than providing product-specific infringement allegations, each claim chart purports to generally accuse Defendant’s use of “for example, FPGA systems that use Bittware XUP-VV8 or AMD Alveo UL 3524 or UL3422 boards.” Each claim chart goes on to state that “[o]n information and belief,” all Accused Instrumentalities have been configured “to operate in a similar manner for purposes of infringement such that the Bittware XUP-VV8 is representative of all Accused Instrumentalities, including AMD Alveo boards.” *See e.g.* Final Infringement Contentions Ex. A at 1.

HFT’s Final Infringement Contentions do not, as required by the Local Patent Rules, “identify[] specifically where *each* element of each asserted claim is found within *each* Accused Instrumentality.” LPR 2.2(c) (emphasis added). As just one example, in HFT’s infringement claim chart corresponding to the ’286 patent, HFT’s allegation of infringement of claim limitation 1(c) is supported by a citation to a single AMD document and makes no mention at all of the Bittware Accused Instrumentality that HFT contends is representative of all three Accused Instrumentalities. *See* Final Infringement Contentions Ex. A at 6–7. Similarly, HFT’s allegations regarding multiple other claim limitations are supported by, at best, citation to a single AMD or Bittware document. *See e.g. id.* at 7–9 (limitation 1(d)), 9–10 (limitation 1(e)), 21 (limitation 1(l)). As a result, HFT’s Final Infringement Contentions fail to specifically identify where each

element of each asserted claim is allegedly found in *any one* Accused Instrumentality, never mind all three Accused Instrumentalities. *See* LPR 2.2(c).

In effect, HFT’s Final Infringement Contentions appear to treat all three Accused Instrumentalities as one combined system from which HFT may mix and match evidence of alleged infringement. Needless to say, that is not the law. HFT’s provision of only these deficient contentions leaves Citadel Securities unable to discern HFT’s infringement theories and, as a result, unable to prepare Final Non-Infringement Contentions which “separately indicate[], for each identified element in each asserted claim . . . whether such element is present literally or under the doctrine of equivalents in each Accused Instrumentality and, if not, each reason for such denial and the relevant distinctions.” LPR 2.3(a).

Please confirm that (1) HFT will prepare and serve replacement Final Infringement Contentions in compliance with the Local Patent Rules which separately chart how each Accused Instrumentality allegedly satisfies each limitation of each asserted claim, and (2) HFT will serve such replacement Final Infringement Contentions by January 27, 2026 and will not oppose an extension to the deadline for both parties to serve final responsive contentions to March 11, 2026.

If HFT does not agree, please provide your availability to meet and confer regarding Citadel Securities’ forthcoming motion to strike HFT’s Final Infringement Contentions.

Sincerely,



Taylor Kelson