

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

HFT SOLUTIONS, LLC,

*Plaintiff / Counterclaim Defendant,*

v.

CITADEL SECURITIES, LLC,

*Defendant / Counterclaim Plaintiff.*

Case No. 1:24-CV-13213

Hon. Sharon Johnson Coleman

Hon. Beth W. Jantz

**JURY TRIAL DEMANDED**

**JOINT STATUS REPORT**

Pursuant to the Court’s Order (ECF No. 61), Plaintiff/Counterclaim Defendant HFT Solutions, LLC and Defendant/Counterclaim Plaintiff Citadel Securities, LLC submit the following Joint Status Report with proposed deadlines for discovery, to join other parties, to amend the pleadings, and any other deadlines required by Rule 26 and the parties’ interest in settlement talks.

The parties met and conferred on January 8, 2026 and continued to confer by email thereafter and agree to the following deadlines:

<b>Event:</b>	<b>Deadline:</b>
Deadline for Plaintiff to Amend Pleadings or Join Parties	March 11, 2026
Revised Final Infringement Contentions	March 25, 2026
Revised <sup>1</sup> Final Invalidity Contentions	March 25, 2026
Exchange of Claim Terms + Proposed Constructions	April 8, 2026
Claim Terms Meet and Confer	[ASAP after exchange]

<sup>1</sup> The Parties have agreed that Citadel’s revised invalidity contentions will not assert new primary invalidity references, and will be limited to revised contentions based on the existing primary references and/or on additional secondary references.

Final Non-infringement Contentions	May 6, 2026
Final Validity Contentions	May 6, 2026
Opening Claim Construction Brief	May 13, 2026
Responsive Claim Construction Brief	June 17, 2026
Reply Claim Construction Brief	July 1, 2026
Joint Claim Construction Chart	July 8, 2026
Claim Construction Hearing	August 5, 2026 or at the Court's convenience
Deadline for Defendant to Amend Pleadings or Join Parties	September 16, 2026
Substantial Completion of Document Production	September 16, 2026
Close of Fact Discovery	Later of October 28, 2026 / 42 days after Claim Construction ruling
Opening Expert Reports	Later of November 18, 2026 / 21 days after Close of Fact Discovery
Responsive Expert Reports	Later of January 13, 2027 / 56 days after Opening Expert Reports
Reply Expert Reports	Later of February 24, 2027 / 42 days after Responsive Expert Reports
Close of Expert Discovery	Later of April 7, 2027 / 42 days after Reply Expert Reports
Deadline for Filing Dispositive Motions / <i>Daubert</i>	Later of June 8, 2027 / 60 days after Close of Expert Discovery
Case "Ready for Trial"	Later of October 26, 2027 / 140 days after Deadline for Dispositive Motions

The parties are not currently engaged in active settlement negotiations as additional discovery is needed. The parties remain open to settlement discussions as discovery progresses. The parties do not believe a settlement conference would be productive at this stage.

Dated: January 13, 2026

Respectfully submitted,

/s/ Marc A. Fenster

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