

IPR2026-00151
U.S. Patent No. 11,575,381

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CITADEL SECURITIES LLC,
Petitioner,

v.

HFT SOLUTIONS, LLC,
Patent Owner.

Case No. IPR2026-00151

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

**PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
MATTHEW R. FORD UNDER 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), Petitioner respectfully requests that the Board recognize Matthew R. Ford as counsel *pro hac vice* during this proceeding.

BACKGROUND

Petitioner's Motion for *Pro Hac Vice* Admission is being filed in compliance with and pursuant to the Order—Authorizing Motion for *Pro Hac Vice* Admission in Case No. IPR2013-00639 (the "Order").

STATEMENT OF FACTS

As required by the Order, the following statement of facts shows that there is good cause for the Board to recognize Matthew R. Ford *pro hac vice*.

Mr. Ford is an experienced patent litigation attorney who has been practicing law for 19 years. Mr. Ford has been involved in numerous patent litigation matters in federal courts across the country. Mr. Ford is admitted to practice in the United States Court of Appeals for the Federal Circuit (and many other courts) and has argued several Federal Circuit appeals arising out of patent litigation matters. Mr. Ford's biography is attached hereto as Exhibit A to this Motion.

Mr. Ford is familiar with the subject matter of this proceeding. His firm is lead counsel to Citadel Securities LLC in a co-pending patent infringement case in the United States District Court for the Northern District of Illinois, *HFT Securities, LLC v. Citadel Securities LLC*, No. 1:24-13213. Mr. Ford has reviewed U.S. Patent No. 11,575,381, the petition, prior art, and other papers filed in this

proceeding. Mr. Ford has also discussed the matter extensively with his partner Meg Fasulo (who is lead counsel in this matter).

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Matthew R. Ford as counsel *pro hac vice* during this proceeding.

DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioner's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Matthew R. Ford attached hereto as Exhibit B as required by the Order.

Dated: February 6, 2026

Respectfully submitted,

By: Meg E. Fasulo
Meg E. Fasulo (Reg. No. 75,820)
BARTLIT BECK LLP
54 W. Hubbard Street
Suite 300
Chicago, IL 60654
Tel: (312) 494-4400
Fax: (866) 381-7456
meg.fasulo@bartlitbeck.com
Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies, that on this 6th day of February, 2026, the foregoing document is being served by electronic mail (e-mail) on counsel of record for Patent Owner as follows:

Dale Chang (dchang@raklaw.com)
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Tel: 310-826-7474
Fax: 310-826-6991

By: Meg E. Fasulo
Meg E. Fasulo (Reg. No. 75,820)
BARTLIT BECK LLP
54 W. Hubbard Street
Suite 300
Chicago, IL 60654
Tel: (312) 494-4400
Fax: (866) 381-7456
meg.fasulo@bartlitbeck.com
Counsel for Petitioner

EXHIBIT A



MATTHEW R. FORD

PARTNER

54 West Hubbard Street, Chicago, IL 60654
312.494.4449
matthew.ford@bartlitbeck.com

Matthew Ford focuses his practice on complex civil litigation, including pharmaceutical and high-tech patent litigation, products liability, trade-secret litigation, and corporate disputes.

Prior to joining the firm, Matthew clerked for the Honorable Joel M. Flaum of the United States Court of Appeals for the Seventh Circuit. He graduated from Northwestern University School of Law in 2007 where he served as the Editor-In-Chief of the Northwestern Law Review. Before law school, Matthew was a consultant for national and international companies in the financial services and energy sectors. Matthew earned a B.A. in government and philosophy from the University of Notre Dame.

EDUCATION & HONORS

Northwestern University School of Law, 2007, J.D., *magna cum laude*

Northwestern University Law Review, Editor-in-Chief

Order of the Coif

Dean's List

University of Notre Dame, 2001, B.A., *cum laude*

CLERKSHIPS

Honorable Joel M. Flaum, United States Court of Appeals for the Seventh Circuit, 2007-2008

AWARDS & RECOGNITION

Recognized as one of Lawdragon's 500 Leading Litigators in America (2024-2026)

Recognized as one of Lawdragon's 500 Leading Global IP Lawyers (2025)

ADMISSIONS

Illinois

REPRESENTATIVE MATTERS

Reddit v. SerpApi LLC, Oxylabs UAB, AWMPROXY, and Perplexity AI, Inc (Southern District of New York)

Counsel for Reddit in SDNY action against multiple parties for unlawfully circumventing technological control measures to access Reddit content. Reddit is pursuing several claims under 17 U.S.C. § 1201 *et seq* as well as state law causes of action.

Colibri Heart Valve, LLC v. Medtronic CoreValve LLC (C.D. Cal. 2023)

Matt put on Colibri's economist to prove the company's damages in a patent infringement case in the United States District Court for the Central District of California. The trial team obtained a \$106.5 million verdict for their client, Colibri Heart Valve. After a one-week trial and five hours of deliberation, the jury returned a verdict finding that the defendant Medtronic CoreValve induced infringement of Colibri's patent and failed to prove that the claims of the patent in question were invalid. Steve Derringer, John Hughes, Meg Fasulo, and Katherine Rhoades rounded out the Bartlit Beck trial team. The victory was recognized by Law360 available here. *Verdict was subsequently overturned on appeal based on pure issue of law.*

Viasat, Inc. v. Western Digital Technologies, Inc. & Kioxia Corp. (W.D. Tex)

Counsel for Viasat in patent infringement case related to Western Digital's and Kioxia's flash memory products. Case pending.

Department of Treasury Cryptocurrency Regulation

Counsel for Coinbase related to a proposed rulemaking by the United States Department of the Treasury seeking to impose additional reporting requirements on Coinbase and other members of the cryptocurrency community.

Seed CX v. Russell Anderson (N.D. Ill.)

Co-lead counsel for Seed CX. Successfully obtained a TRO relating to a crypto-currency exchange's trade secrets. Case settled on confidential terms.

ViiV Healthcare v. Gilead Sciences (D. Del.)

Trial counsel for Gilead in a patent infringement case related to Gilead's Biktarvy® HIV treatment.

Elm 3DS Innovations, LLC v. Micron Technology, Inc., Samsung Electronics Co., Ltd., SK hynix Inc. (D. Del.)

Trial counsel for Elm 3DS in a patent infringement case about stacked integrated circuits.

John Crane Inc. v. Schein Law Group; John Crane, Inc. v. Simon Greenstone Panatier Bartlett (N.D. Ill.)

Counsel for John Crane as plaintiff in civil RICO litigation arising out of alleged fraud in connection with asbestos injury litigation and corresponding claims under asbestos bankruptcy trusts.

Bayer CropScience LP v. BASF SE (E.D. Va.)

Counsel for Bayer in declaratory judgment action seeking declaration that BASF's patent relating to polymorphic forms of the compound tembotrione is invalid. Case settled soon after complaint was filed.

WeightSmart® Litigation

National counsel for Bayer in consumer fraud class action lawsuits relating to OneADay® vitamins. Successfully defeated nationwide class certification motion under New Jersey Consumer Fraud Act. The

district court later certified a Florida-only class. The Third Circuit took the 23(f) appeal and reversed and remanded to the district court based on Bayer's argument that the class was not ascertainable.

Las Vegas Hepatitis C Litigation (District Court, Clark County, Nevada)

Provided strategic direction and coordinated trial teams for UnitedHealthcare in litigation encompassing over 40 individual cases, pending before 20 different judges in state court. Plaintiffs were individuals who claimed to have contracted Hepatitis C during endoscopy procedures performed at clinics that were on defendants' networks of approved healthcare providers. Defendants were health plans and other entities affiliated with UnitedHealthcare. Bartlit Beck tried one case (*Martin v. PacifiCare of Nevada, et al.*), resulting in a favorable jury verdict and subsequent settlement of half of the pending cases. Bartlit Beck began trying a second case (*Paul v. Health Plan of Nevada, et al.*), which settled one month into trial, along with the other remaining cases.

Rolls-Royce v. United Technologies (U.S. District Court, E.D. Va.)

Represented United Technologies and its Pratt & Whitney division in an alleged multibillion-dollar patent case brought by Rolls-Royce. The technology at issue related to the jet engines (particularly the fan blades) used on the world's largest airplane, the Airbus A380, as well as a host of other airplanes. Rolls-Royce sought almost \$4 billion in damages and an injunction preventing further sales of the accused engines. The court granted summary judgment in United Technologies' favor, finding that United Technologies' engines did not infringe the Rolls-Royce patent. In addition, the court struck Rolls-Royce's damages theory. Worked on United Technologies' defense on damages, in particular the application of the Entire Market Value Rule. Prior to the summary judgment decision, the court struck Rolls-Royce's nearly \$4 billion damages theory.

Neology v. Federal Signal and 3M (U.S. District Court, D. Del.; International Trade Commission)

Counsel for Federal Signal and 3M defending patent infringement suits brought by Neology relating to various RFID technologies. Neology originally sued Federal Signal in the District of Delaware and moved for a preliminary injunction. After an evidentiary hearing and oral argument, defeated Neology's preliminary injunction motion. While district court case proceeded, Neology also brought an action against Federal Signal and 3M in the International Trade Commission. Both matters settled before trial.

Bayer v. Warner Chilcott, No. 12-1032-GMS (D. Del.)

Lead counsel in patent infringement lawsuit involving Warner Chilcott's LoLoestrin® oral contraceptive.

Hill-RomService, Inc. v. Stryker Corporation (S.D. Ind.)

Represented Stryker in patent infringement action relating to Stryker's hospital beds and stretchers. Hill-Rom asserted ten patents claiming that Stryker's Zoom® Drive System on four of its hospital beds/stretchers infringed. Case settled favorably for Stryker.

Bayer Schering Pharma AG & Bayer HealthCare Pharmaceuticals, Inc. v. Watson Labs, et al. (D. Nev.)

Trial counsel for Bayer Schering in Hatch-Waxman litigation against challengers seeking to market generic versions of oral contraceptive YAZ®. The district court granted Bayer's motions for summary judgment of validity, infringement, and enforceability. Bayer's claims for damages are pending.

Bayer Schering Pharma AG, et al. v. Lupin Ltd., et al. (D. Nev.)

Trial counsel for Bayer Schering in Hatch-Waxman litigation against challengers seeking to market generic versions of oral contraceptive YAZ®. The district court granted Bayer's motions for summary judgment of

validity.

Swift Transportation Co. v. Ernst & Young (Ariz. State Court)

Represented Ernst & Young in accounting malpractice action stemming from merger between Swift Transportation Company and M.S. Carriers, Inc.

CASES TRIED OR OTHERWISE TAKEN TO JUDGMENT

Reddit v. John Doe(s) (New York County Supreme Court, New York)

Counsel for Reddit in New York State Court action against unknown parties who have misappropriated Reddit data by engaging in the "scraping" of websites instead of licensing content from Reddit. Reddit is pursuing claims for unfair competition and unjust enrichment relating to the way Artificial Intelligence companies build their Large Language Models.

Confidential AAA Arbitration (Seattle, WA)

Trial counsel for aerospace manufacturer in a two-week AAA arbitration before a panel of three arbitrators. The hearing involved direct examinations. The proceedings and outcome are confidential.

Chicago Loop Parking v. City of Chicago (Chicago, IL)

Pro bono counsel for the City of Chicago in an arbitration that Chicago Loop Parking (Morgan Stanley) brought against the City in connection with the Millennium Park Garages. In 2006, Morgan Stanley paid the City \$563 million in exchange for a 99-year concession to operate the garages under Millennium Park and Grant Park on the City's lakeshore. Morgan Stanley filed a claim in arbitration for \$200 million related to the City's permitting the Aqua building (North of Millennium Park) to accept parkers whose destinations are outside of the Aqua building itself. Rebecca Weinstein Bacon co-led the arbitration in October 2012 before a panel of three arbitrators. The Panel rejected Morgan Stanley's claim for \$200 million, awarding only 25% of the amount sought.

Greater New York Automobile Dealers Association, et al. v. Tesla Motors, Inc., et al. (N.Y. Sup. Ct.)

Represented Tesla Motors, Inc. in action by Greater New York Automobile Dealers Association. New York Supreme Court dismissed action by GNYADA and Brian Miller on grounds that they had no franchise relationship with Tesla and therefore no standing to sue. Court also denied the request by the New York State Automobile Dealers Association to join the case as a plaintiff.

Bayer Schering Pharma AG & Bayer HealthCare Pharmaceuticals Inc. v. Teva, et al. (N.D. Ill.)

Counsel for Bayer in Lanham Act false advertising and patent infringement case arising out of Teva's launch of a generic version of Bayer's YAZ® oral contraceptive and product literature claiming that Teva's generic contains Bayer's patented betadex clathrate formulation. Bayer moved for a temporary restraining order on June 15, 2010. On June 16, the court heard argument. Teva contended that Bayer could not show likelihood of success on the merits of its claims and that Bayer was not entitled to emergency relief. During proceedings, the court read a tentative ruling finding that Bayer was entitled to a TRO. Teva agreed to remedial measures including a weekly e-mail blast for three months directed at pharmacists and calling attention to its false prescribing information. Court entered agreed order regarding these remedial measures and required compliance reporting from Teva.

Nicor Gas Co. v. Glenbrook Excavating and Concrete, Inc. (Circuit Court, DuPage County 2010)

Represented public utility company seeking to recover damages caused to four underground gas lines. Co-chaired three-day jury trial. Jury found for Nicor, awarding 95% of damages requested.

PROFESSIONAL ACTIVITIES AND COMMUNITY SERVICE

Academic Positions

Matt was a Lecturer in Law, University of Chicago Law School (2022-2023): Taught Blockchain, Cryptocurrency and the Law

Matt has been an Adjunct Professor of Law at Northwestern Law School teaching “High-Tech Trial Techniques.”

Community and Academic Board and Other Community Service

Advisory Board Member, Kellogg Institute for International Studies

NEWS

Bartlit Beck’s Colibri Heart Valve Win Among the *Daily Journal’s* Top Verdicts of 2023
02.27.2024

Two Bartlit Beck Trial Teams Receive “Litigator of the Week” Runners-Up Honors by *The American Lawyer*
02.21.2023

Bartlit Beck Wins \$106.5M Verdict
02.09.2023

Matt Ford Argues For Bayer Before Federal Circuit
04.2016

Bayer Settles Carrera Class Action Case That Made Key Ascertainability Law
04.2015

Bartlit Beck Prevails in Third Circuit – Reverses Certification of Consumer Fraud Class
09.2013

Bartlit Beck Defeats Nationwide Class in WeightSmart Litigation
07.2011

Bartlit Beck Obtains Immediate Relief For Bayer In Lanham Act False Generic Drug Advertising Case
06.2010

EXHIBIT B

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CITADEL SECURITIES LLC,
Petitioner,

v.

HFT SOLUTIONS, LLC,
Patent Owner.

Case No. IPR2026-00151

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

**DECLARATION OF MATTHEW R. FORD IN SUPPORT OF
PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
MATTHEW R. FORD UNDER 37 C.F.R. § 42.10(c)**

I, Matthew R. Ford, being over 18 years of age and competent to testify and make this declaration based upon my personal knowledge, and being duly sworn and upon oath, hereby attest to the following:

1. I am a partner at Bartlit Beck LLP.
2. I have been a litigating attorney for 19 years. I have been litigating patent cases during the majority of that time period.
3. I am a member in good standing of the State Bar of Illinois and the State Bar of Indiana.
4. I have never been suspended or disbarred from practice before any court or administrative body.
5. I have never been denied admission to practice before any court or administrative body.
6. No sanctions or contempt citations have ever been imposed against me by any court or administrative body.
7. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
8. I understand and agree that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101, *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. Within the past 3 years I have applied and been granted pro hac vice admission in this jurisdiction in *Kioxia Corp. v. Viasat, Inc.*, IPR2022-01067; *Western Digital Technologies, Inc. v. Viasat, Inc.*, IPR2022-01126; *Western Digital Technologies, Inc. v. Viasat, Inc.*, IPR2022-01171.

10. I have familiarity with the subject matter at issue in this proceeding. I began representing and advising the Patent Owner in matters relating to U.S. Patent No. 11,575,381 in July 2025. Since that time, I have become familiar with the '381 patent, its prosecution file history, and the prior art and other papers cited in the Petition.

I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: February 6, 2026

By: Matthew R. Ford
Matthew R. Ford
BARTLIT BECK LLP
54 W. Hubbard Street
Suite 300
Chicago, IL 60654
Tel: (312) 494-4400
Fax: (866) 381-7456
matthew.ford@bartlitbeck.com