

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

HFT SOLUTIONS, LLC,

Plaintiff,

v.

CITADEL SECURITIES LLC,

Defendant.

Case No. 1:24-cv-13213

JURY TRIAL DEMANDED

**DEFENDANT CITADEL SECURITIES, LLC'S INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Patent Rule 2.1, Defendant Citadel Securities LLC ("Citadel") makes the following initial disclosures to Plaintiff HFT Solutions, LLC ("HFT").

These Initial Disclosures are based upon information currently and reasonably available to Citadel as of the date they were prepared. Citadel reserves the right to supplement, amend, correct, clarify, or revise these Initial Disclosures pursuant to further investigation or discovery in accordance with Rule 26(e) of the Federal Rules of Civil Procedure. Citadel further reserves the right to call any witness or present any document or tangible thing at trial that is identified through further investigation or discovery.

Citadel reserves the right to supplement or revise these Initial Disclosures based on any amendments to the Complaint and/or Answer, once filed.

Citadel does not waive any applicable privilege, work product protection, or other objection, and reserves the right to object to the production or admissibility of any information included below.

**1. RULE 26(a)(1)(A)(i): The names, addresses, and telephone numbers of each individual likely to have discoverable information that Citadel may use to support its claims or defenses**

After a reasonable inquiry, Citadel believes that the following individuals are likely to have discoverable information that Citadel may use to support its claims or defenses. Citadel expressly reserves the right to rely upon the testimony of any of the individuals or entities identified herein at trial or otherwise. Citadel also reserves the right to rely upon testimony of any individual who is deposed in this case and any individual identified by Plaintiff in its initial disclosures. Citadel further reserves the right to identify additional individuals and entities as discovery progresses and may call additional witnesses identified in documents produced by the parties in this case and/or in response to interrogatories.

INDIVIDUAL	SUBJECT(S)
Sandeep Mukthavaram – Head of FPGA Engineering, Citadel Securities	Knowledge concerning operation of the accused products and knowledge of the prior art to the asserted patents
Nima Badizadegan – named inventor of the asserted patents	Knowledge regarding conception, reduction to practice, scope, prosecution, ownership, and inventorship of the asserted patents
Representative of HFT Solutions, LLC	Information regarding the operation of the Plaintiff, Plaintiff’s claims and purported damages in this action, waiver, estoppel, licensing, the disclosure of prior art to the USPTO, ownership and assignment of the asserted patents, and marking of the asserted patents on practicing products of the Plaintiff, predecessors-in-interest to the asserted patents, or licensees of the asserted patents
Representative of Amster, Rothstein & Ebenstein LLP	Knowledge concerning the assignment of ownership of the asserted patents; knowledge concerning the prosecution of the asserted patents, including but not limited to any correspondence with the USPTO and any statements, arguments, or amendments that were made in response to USPTO office actions; and knowledge of prior art to the asserted patents
Keith Barkaus, Amster, Rothstein & Ebenstein LLP	Knowledge concerning the assignment of ownership of the asserted patents; knowledge concerning the prosecution of the asserted patents, including but not limited to any correspondence with the USPTO and any statements, arguments, or amendments that were made in response to

	USPTO office actions; and knowledge of prior art to the asserted patents
Representative of Advanced Micro Devices, Inc. f/k/a Xilinx, Inc.	Knowledge concerning operation of the accused products and knowledge of the prior art to the asserted patents
Representative of BittWare	Knowledge concerning operation of the accused products and knowledge of the prior art to the asserted patents

Mr. Mukthavaram may be contacted through the undersigned counsel. Citadel does not consent to communications with, or authorize HFT to communicate with, Citadel’s employees, former employees, or persons represented by attorneys, and does not consent or authorize any communications with the individuals listed that may be contacted through Citadel’s counsel.

Citadel expressly reserves the right to identify or call additional or different individuals as witnesses if, during the course of discovery and investigation relating to this case, Citadel learns that such additional or different individuals have relevant knowledge. In addition, other individuals not specifically known to Citadel may possess relevant information.

2. **RULE 26(a)(1)(A)(ii): A description by category and location of all documents, electronically stored information, and tangible things that are in the possession, custody, or control of Citadel and that Citadel may use to support its claims or defenses.**

Citadel provides below a description by category and location of documents, electronically stored information, and tangible things that it may use to support its claims and that may be in its possession, custody, or control. Citadel reserves the right to supplement or amend this list for the same reasons set forth above.

By providing the following description of documents, Citadel does not waive its right to refrain from the production of any document in its possession, custody, or control, including on the basis that the document is subject to attorney-client privilege or work product immunity, or both, is not relevant to any claim or defense, is subject to a confidentiality agreement or similar non-disclosure obligation, or where production of such document would be unlawful.

Citadel further reserves the right to rely on all documents produced by Plaintiff and any third party during the course of the litigation.

Relevant categories and locations of documents are provided below.

<b>CATEGORY OF DOCUMENTS</b>	<b>DOCUMENT LOCATION(S)</b>
Technical documentation regarding accused products	Defendant, c/o Bartlit Beck LLP
Financial and marketing documentation regarding accused products	Defendant, c/o Bartlit Beck LLP
Prior art and documents relating to the invalidity of the asserted patents	Defendant, c/o Bartlit Beck LLP

**3. RULE 26(a)(1)(A)(iii): Computation of damages**

Citadel has not made any affirmative claim for damages. Citadel disputes that Plaintiff is entitled to any damages. Defendant does not infringe and has not infringed any valid and enforceable claim of the asserted patents, and as such, does not believe any damages for patent infringement should be awarded. Citadel reserves the right to rebut any computation of alleged damages provided by Plaintiff. Citadel reserves the right to seek attorneys' fees under 28 U.S.C. § 285 in the event facts uncovered during discovery demonstrate that this is an exceptional case, or as otherwise permitted by law, and to seek costs under Fed. R. Civ. P. 54(d) and Local Rule 54.1.

Citadel reserves the right to amend and supplement this response as discovery develops.

Any damages calculation by Citadel with respect to its request for fees and/or costs may rely on expert testimony, and Citadel will make the required disclosures according to the deadlines set forth by the Court and/or agreed to by the parties, as may be amended.

4. **RULE 26(a)(1)(A)(iv): Insurance agreements**

At present, Citadel has no disclosure to make under Rule 26(a)(1)(A)(iv).

5. **Categories of Documents Required by Local Patent Rule 2.1**

Citadel provides the Bates number for the following categories of documents. Production of these documents shall be governed by the Protective Order set out in Local Patent Rules Appendix B. *See* LPR 1.4.

CATEGORY OF DOCUMENTS	PRODUCTION
LPR 2.1(b)(1): documents sufficient to show the operation and construction of all aspects or elements of each accused apparatus, product, device, component, process, method or other instrumentality identified with specificity in the pleading of the party asserting patent infringement	Production at the following Bates numbers: CITADEL_HFT_0000001-0105
LPR 2.1(b)(2): a copy of each item of prior art of which the party is aware that allegedly anticipates each asserted patent and its related claims or renders them obvious or ... a description sufficient to identify the prior art and its relevant details.	<i>See</i> prior art cited in the asserted patents and prosecution history. Additional prior art is produced at the following Bates numbers: CITADEL_HFT_0000106-2122

This production is being made based on Citadel’s current investigations to date. Citadel reserves the right to supplement the categories of documents and the documents in each category based on its continued investigation and based on new information brought to light throughout discovery. By making these productions, Citadel does not waive, and expressly reserves, all rights to object to these documents on any basis permissible by the Federal Rules or the local rules of this Court.

In addition, Citadel’s “gross sales revenue from the accused product(s)” as listed in Local Patent Rule 2.1(b)(3) is zero, as Citadel does not sell the accused products.

**6. Reservation of rights**

By making these Initial Disclosures, Citadel does not represent that it has identified every witness or document that it may use to support its claims or defenses. Rather, these Initial Disclosures represent a good-faith effort by Citadel to identify information presently available to it that falls within the scope of Rule 26(a)(1) and Local Patent Rule 2.1. These Initial Disclosures does not include information that may be used solely for impeachment purposes.

Dated: April 28, 2025

Respectfully submitted,

/s/ Meg E. Fasulo

Sean W. Gallagher (IL Bar No. 6239367)

Mark L. Levine (IL Bar No. 6201501)

Nevin M. Gewertz (IL Bar No. 6306008)

Meg E. Fasulo (IL Bar No. 6320595)

Rachel E. Smith (*pro hac vice*)

**BARTLIT BECK LLP**

54 West Hubbard Street, Suite 300

Chicago, IL 60654

Telephone: (312) 494-4400

sean.gallagher@bartlitbeck.com

mark.levine@bartlitbeck.com

nevin.gewertz@bartlitbeck.com

meg.fasulo@bartlitbeck.com

rachel.smith@bartlitbeck.com

*Attorneys for Defendant Citadel Securities LLC*