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September 2, 2026

Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: **Certification of "Will Ben Shelton win the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026?" Event Contract – Submission Pursuant to Commission Regulation 40.2(a)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act" or "CEA"), and §40.2(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "CFTC" or "Commission"), Rothera Exchange and Clearing LLC (the "Exchange" or "Rothera"), a CFTC designated contract market ("DCM"), hereby certifies:

Contract Name:	"Will Ben Shelton win the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026?" Event Contract (the "Event Contract" or "Contract")
Description:	Based on whether Ben Shelton wins the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.
Contract Type:	Swap
Listing Date:	The Exchange intends to list the Event Contract for trading on or after September 4, 2026

In connection with this certification, Rothera is submitting the following:

i. A concise explanation and analysis of the Event Contract;
ii. A certification that the Event Contract complies with the Act and Commission Regulations thereunder;
iii. A certification that Rothera has posted a copy of the product submission on its website;

iv. The intended listing date of the first Event Contract;
v. The terms and conditions of the Event Contract, set forth in Exhibit A hereto; and
vi. A discussion of the Event Contract's compliance with applicable provisions of the Act and Commission Regulations thereunder, set forth in Exhibit B hereto.

The Event Contract is a derivatives contract that is a tradeable financial instrument on a DCM designed to express a market view related to the outcome of a professional sporting event, specifically the final result of a men's tennis match, determined based on official results from the applicable governing organization.

The Event Contract references a binary outcome based on whether the specified individual or team wins the men's tennis match as identified in the Contract. For purposes of this Contract, the outcome is determined solely by reference to the final score or outcome of the completed match, including any tie-breaking procedures, as officially reported by the applicable governing organization or its designated statistical reporting sources, as described in greater detail in Exhibit A.

Settlement of the Contract will be determined by reference to the officially reported final result of the men's tennis match. No portion of the Contract is contingent on the outcome of any discrete set, game, or segment of the game.

The Event Contract operates in a manner similar to contracts that other DCMs have certified for trading. Price bands will apply to the Contract so that trading only occurs between $0.01 and at most $0.99. The Contract has a notional value of $1 and a minimum price fluctuation of $0.01.

As outlined in Rothera Rule 4.6, trading in the Event Contract will be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. At least one market maker will be providing liquidity for the Event Contracts available for trading on Rothera. Rothera has further imposed position accountability levels as described in more detail below. Participants will be charged fees in such amounts as may be revised from time to time and reflected on Rothera's website.

The contract specifications are set forth in Exhibit A. A complete index of the Core Principles for designated contract markets, addressing each applicable Core Principle, is set forth in Exhibit B, and is submitted pursuant to a petition for confidential treatment under the Freedom of Information Act, in accordance with CFTC Regulation 145.9. All terms that are used but not defined herein have the meanings set forth in the Exchange Rules.[1]

[1] Available at: https://www.rothera.io/reg-notices.

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The Exchange hereby certifies that the product complies with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to the Exchange by governing boards or market participants with respect to this certification. The Exchange hereby certifies that a copy of this submission was concurrently posted on the Rothera website.

Should Commission staff have any questions regarding the above, please do not hesitate to contact me by telephone at (773) 703-6365 or by email at kevin@rothera.io.

Sincerely,

/s/

Kevin Dan
Chief Compliance and Regulatory Officer
Rothera Exchange and Clearing LLC

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EXHIBIT A

“Will Ben Shelton win the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026?” Event Contract

Scope - These terms govern the trading of the “Will Ben Shelton win the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026?” Event Contract (the “Contract”), a type of “Event Contract” listed by the Exchange.

Underlying - The Underlying for this Contract is the final result of whether Ben Shelton wins the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

Source Agency - The Source Agencies are, in hierarchical order, www.atptour.com and the official statistics published on its public website, ESPN, CBS Sports, Fox Sports, the Associated Press, the Wall Street Journal, and the official broadcaster of the referenced tennis match.[2]

Type - The type of Contract is a swap.

Trading and Settlement - During the Event Contract trading hours, Participants are able to adjust their positions and trade freely. After trading of the Event Contract has closed, Rothera will determine the Expiration Value and whether the Payment Criterion encompasses the Expiration Value (i.e., whether the outcome is “Yes” or “No”). The market is then settled by Rothera, and either the long position holders or the short position holders are paid the Settlement Value. In this case, “long position holders” refers to Participants who purchased the “Yes” side of the Event Contract and “short position holders” refers to Participants who purchased the “No” side of the Event Contract. If the Expiration Value is “Yes”, then the long position holders are paid the Settlement Value multiplied by the number of Contracts held by such Participant and the short position holders receive no payment. If the Expiration Value is “No,” then the short position holders are paid the Settlement Value multiplied by the number of Contracts held by such Participant and the long position holders receive no payment. Specification of the circumstances that would trigger an Expiration Value of “Yes” is included below in the section titled “Payment Criterion”. The Expiration Date of the Contract is designed to account for multiple possible contingencies regarding the timing of the determination of the event. Any subsequent revisions to the initial release of the final result of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 by the league or association will NOT affect or alter the

[2] All trademarks are the property of their respective owners.

settlement value of the Contract once the Expiration Value is determined by the Exchange.

Payment Criterion - The Payment Criterion for the Contract encompasses the Expiration Value where Ben Shelton is the winner of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026. In order to be considered the “winner” of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026, Ben Shelton must win the majority of the required sets in the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026, whether determined by completed play, opponent retirement, or default/disqualification. The market resolves based on the first final result reported by the Source Agency, unless the Exchange, in its sole discretion pursuant to DCM Rule 7.2, determines that such result is clearly erroneous and elects to defer to a corrected official final result issued prior to Expiration.

- All tie-breaking procedures for the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 are included in determining the winner.

- If the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is cancelled prior to the first point being played, the market will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by $1 minus the fair market price.

- If the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 begins (at least one point is played) and ends by retirement, default, or disqualification, the competitor recorded by the Source Agency as the winner of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 governs resolution, and the Contract is settled on that recorded result.

- If the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is cancelled or discontinued after the first point is played, all markets will resolve to the last fair price as determined at the sole discretion of the Exchange.

- If the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is delayed and scheduled to occur within the original timeframe of the tournament, the market will remain open with settlement occurring no later than two (2) days after the originally scheduled conclusion of the specified tournament or match. Additionally, a change of venue, playing surface, or court conditions, or change to the tournament or match format (for example, a change in the number of sets), does not affect resolution so long as a final result indicating a winner of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is recorded by the Source Agency.

- If the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is delayed and not scheduled to occur within the original timeframe of the tournament or match, the Contract will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by $1 minus the fair market price. A new market will be created for the newly scheduled Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.

- If Ben Shelton withdraws prior to the first point of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026, all related markets will resolve based on the first final result recorded by the Source Agency. If no final result is recorded by the Source Agency, the market will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by $1 minus the fair market price.

- If Ben Shelton retires due to injury or other circumstance during the match, all markets affected by the retirement of Ben Shelton will resolve based on the first final result recorded by the Source Agency. If no final result is recorded by the Source Agency, the market will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by $1 minus the fair market price.

- If Ben Shelton is disqualified after the conclusion of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 and prior to Expiration Time, the results of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 will not be adjusted.

- If the first final result of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026 is delayed or unavailable, the Exchange may wait up to 24 hours after the Expiration Time for data availability, after which it may resolve the Contract pursuant to Rothera DCM Rule 7.2.

- If a Source Agency publishes a result that it subsequently retracts, corrects, or confirms was the result of a compromised, hacked or erroneous source, the Exchange will rely on the final corrected result published by the Source Agency prior to the Expiration Time.

Minimum Tick - The Minimum Tick for the Event Contract shall be $0.01.

Position Accountability Levels - The Position Accountability Level for the Event Contract is 2,500,000 Contracts for Participants. The Position Accountability Level for Market Makers is 25,000,000 Contracts, or as updated on the Exchange's website.

Last Trading Date - The Last Trading Date of the Contract will be the same as the Expiration Date. The Last Trading Time will be the same as the Expiration Time.

Settlement Date - The Settlement Date is the date on which money is paid to the account of a Participant in whose favor the contract settled pursuant to an Event Contract held until Expiration, and on which money is paid from the account of a Participant who is obligated to pay money pursuant to an Event Contract held until Expiration. The Settlement Date of the Contract shall be no later than the day after the Expiration Date.

Expiration Date - The latest Expiration Date of the Contract shall be two (2) days after the originally scheduled date of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026. If an event described in the Payment Criterion occurs, expiration will be moved to an earlier date and time as determined by the Exchange.

Expiration Time - The Expiration Time of the Event Contract shall be 10:00 AM CT on the Expiration Date.

Settlement Value - The Settlement Value is the amount paid to the holder of the in-the-money Event Contract on the Settlement Date. The Settlement Value of an in-the-money Event Contract is $1.00.

Expiration Value - The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration Time.

Contingencies - If the Source Agency does not actually announce a result consistent with the settlement methodology or the Payment Criterion on or before the Expiration Date due to a delay, postponement, cancellation or otherwise in such release announcement by the Source Agency, the Settlement Date, Expiration Date and Expiration Time will be delayed until the Underlying outcome or results are released or as otherwise set forth on the

Exchange pursuant to DCM Rule 7.2. Consistent with DCM Rule 7.2, Rothera reserves the right to make settlement determinations.

Trading Prohibitions - In addition to the prohibition against the misappropriation of material nonpublic information under CFTC Regulation 180.1, the Exchange's prohibited trading activities set forth in Chapter 7 of the DCM Rulebook, certain additional individuals are prohibited from trading the Event Contract. Those persons include:

- Current and former players, and the coaches, trainers, physiotherapists, medical staff, hitting partners, agents, managers, and other support-team members of Ben Shelton.
- Chair umpires, line umpires, review officials, referees, supervisors, and other on-court or tournament officials of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.
- Employees, officers, contractors, and statisticians of the governing body sanctioning the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026, of the official tournament authority, and of the official statistics or data provider responsible for compiling, scoring, or first publishing the Underlying.
- Any sports agent, legal advisor, or tournament representative of a player or member association participating in the referenced tennis tournament or match.
- Any person with access to material nonpublic information regarding the fitness, injury, withdrawal, or scheduling of Ben Shelton relevant to the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.
- Ultimate beneficial owners and operators of the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.
- Any immediate family member, household member, or close associate of any of the foregoing persons, where such person reasonably may have access to material nonpublic inside information regarding the Ben Shelton vs. Hubert Hurkacz tennis match on September 2, 2026.
- Any individual subject to integrity or ethics rules of a tennis league or association who has a professional duty to safeguard the integrity of tennis competitions.
- Any other Person who, by sole determination of the Exchange, possesses material nonpublic information relating to the Underlying.

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CONFIDENTIAL TREATMENT REQUESTED BY ROTHERA PURSUANT TO 17 CFR 145.9

EXHIBIT B

COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT AND COMMISSION REGULATIONS THEREUNDER

[REDACTED]