

	LUDLOW EXCHANGE, LLC DESIGNATED CONTRACT MARKET	Ticker MLBSTACH
MLB¹ STATISTICAL ACHIEVEMENT Class Certification of MLB Statistical Achievement Swaps Pursuant to CFTC Regulation 40.2(d) Includes: 1. Cover Letter (with Certifications) (Public)		

¹ Major League Baseball is not affiliated or associated with Ludlow Exchange, LLC. Neither Major League Baseball nor any of its affiliates sponsors, endorses, sells, promotes, approves, or is otherwise involved with this Contract or any other product offered by Ludlow Exchange. Any reference to Major League Baseball is solely for purposes of identifying the underlying event and the applicable settlement source.

SUBMITTED VIA CFTC PORTAL

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

Re: Class Certification of MLB Statistical Achievement Swaps Pursuant to Section 5c(c) of the Commodity Exchange Act and CFTC Regulation 40.2(d)

Dear Sir or Madam:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”), 7 U.S.C. § 7a-2(c), and Commission Regulation 40.2(d), 17 C.F.R. § 40.2(d), Ludlow Exchange, LLC (“Ludlow” or the “Exchange”), a registered designated contract market doing business as Novig, hereby certifies a class of MLB Statistical Achievement swaps (the “Class”) for listing on the Exchange.

A description of the Class and the certifications required by Regulation 40.2(d) follow:

The Previously Certified Contract. On July 31, 2026, the Exchange submitted and certified the MLB Statistical Achievement Contract pursuant to Commission Regulation 40.2(a), CFTC Submission No. 2607-3116-2543-63 (the “Previously Certified Contract”). The submission included the complete terms and conditions governing the Previously Certified Contract, including its pricing sources, formulas, procedures, and methodologies for determining reference values and payment obligations.

The Class. Each particular swap within the Class is an event contract based on the official result of a specified MLB statistical achievement, expressed either as a season- or tournament-long statistical distinction or as a numerical threshold on a statistical measure. Each swap will be governed by the terms and conditions of the Previously Certified Contract. The values assigned to <participant>, <achievement>, <measure>, <comparison operator>, and <count> may vary among swaps within the Class and will be specified by the Exchange before the applicable swap is listed. No other term affecting the pricing source, calculation of the reference value, payment obligations, settlement procedure, or settlement currency may vary among swaps within the Class.

Identical Pricing Sources and Methodology. Each swap within the Class will use Major League Baseball (“MLB”) as the Source Agency and the identical source hierarchy specified in the Previously Certified Contract: (i) the official box score as published by MLB; (ii) ESPN; (iii) the Associated Press; and (iv) Fox Sports. For an outright swap, if the first official final result of <achievement> is, or is achieved by, <participant>, the YES side receives the \$1.00 Settlement Value; if it is not, the NO side receives the \$1.00 Settlement Value. For a numeric swap, if the official <measure> accumulated by <participant> over the period to which <achievement> relates is <comparison operator> <count>, the YES side receives the \$1.00 Settlement Value; if it is not, the NO side receives the \$1.00 Settlement Value. Ties in outright swaps are governed by the identical Dead-Heat Rule: where multiple participants are reported as the result of <achievement>, each resolves YES at the full \$1.00 Settlement Value and the corresponding NO positions resolve at \$0.00, unless the Market Title or Market Description expressly provides for dead-heat treatment, in which case YES resolves at \$1.00 divided by the number of

participants declared as the result, rounded down to the nearest Minimum Tick, and NO resolves at \$1.00 minus that YES payout. Numeric swaps are governed by the identical Numeric Form Rule: where the Expiration Value is exactly equal to <count> on a two-way line and <comparison operator> is “above” or “below,” the swap settles to Void and is resolved under the Fair Value Settlement Rule, unless the swap is quoted on the exact value or the Market Title or Market Description states otherwise. Settlement and any Void will otherwise be determined under the identical Final-Event Timing Rule, Early Conclusion Rule, Cancellation Rule, Withdrawal Rule, Disqualification Rule, Elimination Rule, Re-Entry Rule, Settlement Finality Rule, Extraordinary Circumstances Rule, and General Market Suspension Rule, and any Void or fair-value settlement will be determined under the identical Fair Value Settlement Rule, including the same Reference Time, Calculation Window, composite pricing sources, normalization methodology, data-integrity exclusions, fallbacks (including a binding determination by the Outcome Review Committee under the Cancellation Rule), and payment allocation. Each swap will be denominated and settled in United States dollars.

Certifications. Pursuant to Section 5c of the Act and Commission Regulations 40.2(a)(3)(iv), 40.2(a)(3)(vi), and 40.2(d), the Exchange hereby certifies that:

- (i) each particular swap within the Class is based upon an excluded commodity specified in Commission Regulation 40.2(d)(1), specifically an occurrence, extent of an occurrence, or contingency within Section 1a(19)(iv) of the Act;
- (ii) each particular swap within the Class is based upon an excluded commodity with an identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations;
- (iii) the pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in each particular swap within the Class are identical to those used in the Previously Certified Contract;
- (iv) each particular swap within the Class is based upon an excluded commodity involving an identical currency, the United States dollar;
- (v) each particular swap within the Class complies with the Act and the Commission’s regulations thereunder; and
- (vi) concurrently with the filing of this submission, the Exchange has posted on its public website at <https://www.ludlowexchange.com/filings> a notice of pending class certification and a copy of this submission.

Submission Timing. The Exchange has filed this submission electronically through the CFTC Portal and will not list or facilitate trading in any swap within the Class unless the Commission has received this submission by the open of business on the business day preceding the listing, as required by Commission Regulation 40.2(a)(2).

Sincerely,

Calvin Smith



Head of Markets
Ludlow Exchange, LLC