

# MURPHY & McGONIGLE

A Professional Corporation

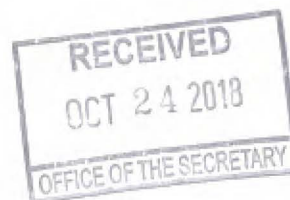
E-mail: [REDACTED]  
Direct phone: [REDACTED]  
Facsimile: [REDACTED]

1001 G St., N.W.  
7<sup>th</sup> Floor  
Washington, D.C. 20001

October 23, 2018

**VIA HAND DELIVERY**

Brent Fields  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090



**RE: Notice of Intention to Petition for Review of Order Approving Proposed Rule Change to Amend Exchange Rule 6.49A, Transfer of Positions; Exchange Act Release No. 84437, File No. SR-CBOE-2018-060**

Dear Mr. Fields:

As counsel for Susquehanna International Group, LLP (collectively, and with its affiliated and related entities, "SIG"), we submit this letter on behalf of SIG, pursuant to Rule 430(b)(1) of the Securities and Exchange Commission's Rules of Practice, as written notice of SIG's intent to petition for review of the Order Approving Proposed Rule Change to Amend Exchange Rule 6.49A, Transfer of Positions; Exchange Act Release No. 84437, File No SR-CBOE-2018-060. The action approving the proposed rule change was made by the Division of Trading and Markets pursuant to delegated authority (17 C.F.R. § 200.30-3(a)(12)) on October 16, 2018 (*see* <https://www.sec.gov/rules/sro/cboe/2018/34-84437.pdf>). SIG intends to file separately a petition for review in accordance with Rule 430(b)(2) of the Securities and Exchange Commission's Rules of Practice.

Any questions concerning this matter can be directed to me at [REDACTED].

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Joseph C. Lombard". The signature is fluid and cursive.

Joseph C. Lombard